

VERMONT PYS 2024-2027

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## OVERVIEW

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

## OPTIONS FOR SUBMITTING A STATE PLAN

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

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

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

the program-specific requirements for that program where such planning requirements exist separately for the program. The Combined State Plan partner programs are—

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)
- Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et seq.)
- Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))<sup>1</sup>

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

#### HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

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

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

system and alignment strategies for workforce development programs to support economic growth.

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

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.<sup>2</sup> States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations. Use of links to external websites and documents is permitted within the State Plan narrative submission, if such links remain active and adhere to Section 508 accessibility requirements.

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

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

## I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

### A. WIOA STATE PLAN TYPE

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

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

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

This is a combined plan

#### COMBINED PLAN PARTNER PROGRAM(S)

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

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

No

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

No

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

No

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

No

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

Yes

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

Yes

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

No

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

No

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

No

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

No

## B. PLAN INTRODUCTION OR EXECUTIVE SUMMARY

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

## II. STRATEGIC ELEMENTS

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State's current economic environment and identifies the State's overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs to support economic growth. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. Where requirements identify the term "populations", these must include individuals with barriers to employment as defined at WIOA Section 3. This includes displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals. Additional populations include veterans, unemployed workers, and youth, and others that the State may identify.

### A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

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

## 1. ECONOMIC AND WORKFORCE ANALYSIS

### A. ECONOMIC ANALYSIS

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

#### I. EXISTING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

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

#### II. EMERGING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

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

#### III. EMPLOYERS' EMPLOYMENT NEEDS

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

Vermont is the second-least populated state in the country and among the smallest geographically. Most of the land remains forested, and most of the population lives in rural areas. The most densely populated area is along Lake Champlain in the northwest of the state, an area containing the state's largest city, Burlington. The Burlington metro area is responsible for about one-third of the state's population and forty percent of the state's jobs. Other areas of population and employment concentration include the Barre-Montpelier corridor in the center of the state, the Rutland region in south-central Vermont, Brattleboro in the southeast, and Bennington in the southwest.

The state's economy has historically been driven by agriculture, mining, logging, and manufacturing. Today, it is far more diversified, with industries with high concentrations of jobs in private education, health care, manufacturing, retail trade, and utilities.[1] The state government also has a larger share of the jobs available than in most states, largely due to state and local education and the federal border with Canada.

#### *Existing Demand Industry Sectors and Occupations*

##### **Industries**

Vermont's diverse industry composition includes a high concentration of employment in education & health services (location quotient[2], Q1 2023: 1.42). Other industries with high employment concentrations in Vermont include leisure and hospitality (1.41) and manufacturing (1.15). Each of those was among the hardest hit during the COVID-19 pandemic, leading to losses in Vermont greater than losses seen nationwide. As the economy rebounded in the years since, these industries have demonstrated very high demand as they attempted to refill the lost positions.

All three industries report that recruiting qualified candidates remains a significant challenge in this post-pandemic economic environment. Despite recruitment attempts, manufacturing



employment remains almost 2,000 jobs (-6.3%) below pre-pandemic levels.[3] Durable goods manufacturing remains particularly low at 8.2% below pre-pandemic levels. Based on anecdotal information from employers and job openings data, it appears the primary driver of these low employment levels is a lack of supply of skilled labor, not a decrease in demand by employers.

Seasonally adjusted employment in leisure and hospitality remains 2,600 jobs (7.0%) below pre-pandemic levels. Education and health services remain 4,100 jobs (-6.2%) below pre-pandemic levels. As with manufacturing, the high rate of job openings information from employers indicates that these low employment levels are almost exclusively a supply factor.<sup>3</sup>

## **Occupations**

Strictly in terms of openings, the occupations expected to be in greatest demand are jobs that require low skill levels and limited experience. These include cashiers and retail salespersons, each with over 1,250 openings per year. One occupation with a large number of openings that requires more involved training and education is Home Health and Personal Care Aids, a job that can serve as a career ladder into health sciences. Among the more highly skilled occupations, Vermont expects to need 272 software developers, 227 Substance Abuse, Behavioral Disorder, and Mental Health Counselors, and about 700 K-12 teachers each year.

When we look at occupations that we expect to have high growth rates and a large number of openings, a less obvious selection emerges. Fitness and Recreation worker jobs are expected to grow at nearly double the statewide average and have a combined 400 openings per year over the next decade. We expect restaurant chefs, head cooks, and cooks to grow at a rate almost five times the statewide average, with about 535 openings per year over the decade. The growth rate for Automotive Technicians is somewhat low (0.3%), but we expect 200 openings per year in this occupation. We also expect to need in excess of 4,400 new registered nurses over the next decade, far exceeding the current number of annual graduates we expect to remain in-state. 900 Licensed Practical Nurses. 2,720 software developers, 7,850 K-12 teachers, 4,460 carpenters, and almost 1,500 CNC tool operators will be needed. With the rise in healthcare needs and the expanding manufacturing field, it is critical that we work with Vermont businesses to help develop a labor force capable of meeting their needs.

Finally, if Vermont is going to meet its workforce needs, the state will need to increase the number of people qualified in just about every occupation in the state. Currently, there are almost 3 open positions for every unemployed Vermonter, which is an unsustainable figure that threatens to impact economic growth.

### *Emerging Demand Industry Sectors and Occupations*

The state of Vermont collaborates with the McClure Foundation to produce “Pathways to Promising Careers,” a report on emerging high-demand, high-paying occupations. The report includes occupations that are expected to grow faster than the statewide aggregate rate with a median wage above the statewide median wage. The findings of that report serve as the basis for this section.

The occupation with the most 10-year projected openings that also meets the aforementioned definition is K-12 teachers, with 7,850 expected openings and median annual wages of about \$61,000. Entry into this occupation typically requires a bachelor’s degree. For the same level of education required, the aforementioned Registered Nurses are projected to have the next most openings at 4,460 over the next decade. The median RN wage is about \$36.00 per hour. See Table 1 for a list of high-wage occupations projected to have the most openings.

Occupation	Minimum education	Projected openings	Median wage
K-12 Teachers	Bachelor’s Degree	7,850	\$61,000 / yr.
Bookkeeping & Accounting clerks	Certificate	5,320	\$47,200 / yr.
Registered Nurses	Bachelor’s Degree	4,460	\$75,000 / yr.
Carpenters	High School + Training	4,460	\$47,700 / yr.
Sales Representatives	High School + Training	3,760	\$61,000 / yr.

*Table 1: Occupations with the most 10-year projected openings at all education levels*

Several Occupations that require a high school degree and additional training are expected to be in high demand over the next decade. These include Computer Support Specialists (1,200 openings at a median wage of \$29.00), and numerous trades-related occupations such as Construction Equipment Operators (1,200 openings at a median wage just below \$24 per hour). See Table 2 for high-wage, high-demand occupations requiring this level of education.

Occupation	Projected openings	Median wage
Carpenters	4,460	\$47,700 / yr.
Sales Representatives	3,760	\$61,000 / yr.
Fitness Trainers	1,880	\$59,200 / yr.
Chefs & Head Cooks	1,630	\$48,000 / yr.
CNC Tool Operators	1,490	\$49,192 / yr.

*Table 2: High wage, highest demand occupations requiring high school diploma and training.*

The occupations with emerging demand for people with a bachelor’s degree or higher include the aforementioned Registered Nurses and many others. We expect over 2,700 openings for software developers, 1,430 openings for engineers, 1,300 social worker openings, almost 1,000 public relations specialists, 1,140 openings for human resource specialists, over 2,500 accountant openings, 2,000 project management specialists, and 1,400 openings for market research analysts. These openings will be very challenging to fill in light of the education and workforce data presented below (see Table 3).

Occupation	Minimum education	Projected openings	Median wage
K-12 Teachers	Bachelor’s Degree	7,850	\$61,000 / yr.

Occupation	Minimum education	Projected openings	Median wage
Registered Nurses	Bachelor's Degree	4,460	\$75,000 / yr.
Accountants & Auditors	Bachelor's Degree	2,540	\$69,500 / yr.
Substance Abuse & Mental Health Counselors	Bachelor's Degree	2,270	\$47,300 / yr.

*Table 3: High wage, highest demand occupations requiring bachelor's degree or greater*

Numerous occupations requiring an apprenticeship or recognized certificate are also experiencing emerging demand. We expect to have over 1,500 openings for electricians over the next decade, with a median wage of \$23 per hour and far higher wages for master electricians. Other trades-related occupations in high demand include plumbers and pipefitters (expected openings, 1,240 and median wage of \$24 per hour), HVAC mechanics (1,000 openings at \$29 / hour), and Tractor Trailer Truck Drivers (3,200 openings at \$24 per hour) (see table 4).

Occupation	Minimum Education	Projected openings	Median wage
Bookkeeping & Accounting Clerks	Certificate	5,320	\$47,200
Tractor Trailer Truck Drivers	Certificate	3,820	\$48,900
Electricians	Registered Apprenticeship	1,550	\$48,200
Plumbers & Pipefitters	Registered Apprenticeship	1,240	\$49,200
Computer Support Specialists	Certificate	1,200	\$60,100

*Table 4: High wage, highest demand occupations apprenticeships or certificates*

### *Employer Needs*

As addressed above, the current demand for labor far exceeds the supply of workers in Vermont, particularly in certain industries and among occupations with specialized skill sets. The labor shortage that existed prior to the pandemic has become significantly more acute as the economic expansion built over the past three years.

The most significant employer need at the moment is simply the need for staff at all levels; at the time of the writing of this plan, there are approximately 20,000 open positions in a state with only 7,000 unemployed persons – almost 3 openings per unemployed person with a labor force of less than 350,000.

To better understand the available employment opportunities in the state, the Vermont Department of Labor dedicated resources for two years towards contacting employers to ask about posted jobs and which skills were most difficult to recruit for: workplace effectiveness

and interpersonal skills. This includes showing up on time, following instructions, and working well with others.

Beyond these basic skills and the general labor shortage, employers in the state report specific difficulty filling certain medium- and high-skill positions. The most in-demand skills relate to basic job performance: critical thinking skills, basic math skills, and reading / verbal language comprehension. More specialized skills in the highest demand are related to medical fields, education, and the trades.

The four industries with the most acute need are:

- Health care: Nurses, respiratory therapists, dental hygienists, a wide range of direct service medical jobs. These positions require specific knowledge and skills that are lacking in the current Vermont labor force, namely the education and licensing required for the positions.
- Construction: People with skills in framing, carpentry, plumbing, electrical, HVAC, and welding, as well as heavy machinery operators and renewable energy installation. While the state has a robust system of career technical education centers for high school-aged students, there are not enough training opportunities for the adult population.
- Private education: Early Childhood Education in particular. An industry that was short of skilled early childhood education specialists prior to the pandemic is now facing a far more acute problem. The primary need is qualified early-education teachers.
- Food prep and serving-related occupations: there are expected to be 4,500 openings per year for the next decade. Its largest industry, leisure and hospitality, will need thousands of people; despite robust growth in demand for services, the industry is still 10.5% below its pre-pandemic employment levels. The greatest needs are people with strong customer service skills and those with experience or training working in commercial / restaurant kitchens.

In most cases, these positions require some post-secondary education or can be learned through a registered apprenticeship. These industries lost a significant amount of their workforce during the pandemic and are trying to meet increased demand in an environment of significant wage pressure.

[1] Quarterly Census of Employment and Wages, 2020. Economic & Labor Market Information Division, Vermont Department of Labor

[2] A location quotient measures the concentration of employment in a region relative to the United States. A figure of 1.1 means that Vermont's percentage of all jobs that are in the industry is 10% higher than the US concentration

[3] Current Employment Statistics. Economic & Labor Market Information Division, Vermont Department of Labor

## B. WORKFORCE ANALYSIS

The Unified or Combined State Plan must include an analysis of the current workforce in the State and within various state regions. Provide key analytical conclusions in aggregate as well as disaggregated among populations to identify potential disparities in employment and educational attainment and understand labor force conditions for items (i)-(iii) below. Populations analyzed must include individuals with barriers to employment described in the first paragraph of Section II. Analysis must include—

### 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.

During the previous decade, Vermont's population increased slowly. The state saw its population increase by 17,336 to 643,077 over the decade from 2010 to 2020, a growth of 2.8%. Between 2020 and 2023, the population has continued to climb, adding a couple thousand people each year and reaching 647,064 in July of 2022, the most recent available estimate.

The Burlington – South Burlington Metropolitan area was responsible for the largest share of the population growth between 2010 and 2020, adding 14,301 people (6.8%) to reach a 2020 population of 225,562. The balance of the state grew by only 3,035 or 0.1% over that same period.[1] Between 2020 and 2022, however, the growth has been more balanced; Chittenden County is responsible for just under a quarter of statewide population growth.

The Median Household income in the state was \$67,674 in 2021, an increase of \$5,700 relative to 2019's pre-pandemic level without adjusting for inflation. The 2021 figure is just slightly below the national median of \$69,021. On average, however, Vermont households have fewer people to support on that income; the U.S. averages 2.60 people per household, while Vermont has among the smallest household averages at 2.35 persons.[2]

A couple of notable demographic data points are relevant to any discussion of the Vermont economy. First, Vermont's population is more highly educated, on average, than the United States. As of 2020, 40.9% of Vermonters hold a bachelor's degree or higher compared to approximately 33.7% of the U.S. population. This is important because education is tightly correlated to wages, and higher levels of educational attainment are correlated with higher levels of labor force participation and lower turnover rates. Despite this high aggregate level of education, a large population of people over 25 years old in the state (5.0%) is without a degree or diploma. The labor force participation rate for this cohort is very low, and nationally, it is below 48%. Preparing these individuals for success in the labor market is an important part of growing our labor force and lifting families out of poverty. In addition, there is a disparity in educational attainment by gender; women are less likely to leave formal education before completing high school and more likely to obtain a bachelor's degree or higher. See Table 5.

	% of population	% of male population	% of female population
Less than HS	5.0%	5.9%	4.2%
High School Diploma	26.0%	29.1%	23.1%
Some College, no degree	15.9%	15.8%	15.9%
Associate degree	8.8%	8.8%	8.8%
Bachelor's degree	24.5%	23.8%	25.2%
Graduate or Professional degree	19.7%	16.5%	22.8%

*Table 5: Educational Attainment of Vermonters 25 years of age and over.*

Second, Vermont’s population is significantly older than the population of the United States. In 2022, 21.6% of Vermont’s population was older than 65, a seven- percentage point increase since 2010. This compares to 17.3% of the U.S. population. Meanwhile, 17.7% of Vermont’s population is under 18, while in the U.S., that figure is 21.7%. Everything else being equal, as a greater portion of the population reaches 65 years of age and begins to retire, the labor shortage will become more acute (see below).<sup>2</sup>

### *Employment and Unemployment*

The slow population growth in Vermont in recent years was matched by slow growth in employment. Statewide non-farm payroll employment grew from a seasonally adjusted 2010 average of 298,200 to a 2019 average of 316,300, an increase of 18,100 or 6.1% (the March 2020 onset of the COVID-19 pandemic reduced the 2020 figure to 286,600). The Burlington-South Burlington NECTA was responsible for the most significant portion of that growth. Its non-farm employment increased by 12,100 (10.6%) to 126,500 between 2010 and 2019.[3]

By 2022, post-pandemic employment had rebounded to an annual average of 303,600. With slow growth over most of 2023, the October 2023 Total Non-farm figure stood at 307,700. This represents 8,600 (-2.7%) fewer jobs than in 2019. Measured from pandemic-era lows, however, it represents an increase of 59,400 jobs (+23.9%). Leisure and Hospitality (the super-sector containing both Accommodation and Food Service and Arts, Entertainment, and Recreation) has grown by 19,600 jobs since the trough but remains approximately 3,000 below pre-pandemic levels. Over the past 12 months, it has added 1,000 jobs (+3.1%). Other industries that remain well below their pre-pandemic levels include Nursing and Residential Care Facilities (-1,400 or -18.9%), Durable Goods Manufacturing (-1,600 or -8.6%), and Private Colleges, Universities, & Professional Schools (-600 or -7.1%).

Over the past 12 months (October 2022 – October 2023), the industries with the most significant percentage employment gains were Arts, Entertainment & Recreation (+9.5%), Utilities (+8.3%), Administrative & Waste Management Services (+8.2%) and Local Government Educational Services (+6.3%). Industries that have experienced losses over that same period include Hotels (-6.3%), Private Colleges, Wholesale Trade (-4.4%), Universities & Professional Schools (-3.7%), Manufacturing (-3.4%), and Other Services (-3.0%).

The state's labor force slowly but steadily declined during the 2010s, falling 1.7% from a peak of 359,692 in 2010 to 353,506 in 2019.[4] This decline was mainly driven by age demographics in the post-WW2 generation aging out of the labor force. A declining participation rate among young people also pulled the figure down as young people entered the labor force later in life.

Vermont's labor force participation rate declined in tandem with the labor force. This century's highest labor force participation rate recorded was in late 2006 at 71.3%. Between the end of the December 2007 recession and January 2020, the rate fell from 71.2% to 66.2%.[5] This decline mirrors and magnifies national trends, which show a decrease from 65.5 in 2010 to 63.3 in early 2020.[6] In the initial months of the pandemic, Vermont's seasonally adjusted labor force increased from 351,542 in February 2020 to 353,034 in April as the number of unemployed persons increased from 7,777 to 49,506. By May 2020, the labor force began to decline, reaching a pandemic-era low of 331,630 in November of that year. The labor force participation rate fell as low as 61.8% that same fall. Since then, the labor force has grown in all but two months, with an average monthly increase of just over 500 people. At 64.2%, the labor force participation rate is still below pre-pandemic levels; however, it is slightly above the expected level based on pre-pandemic secular trends from the previous decade.<sup>7</sup>

Vermont's low unemployment rate since the pandemic masks stark differences in employment outcomes for specific age demographics. The 12-month moving average of the unemployment rate for people 16-24 years old stands at around 5%, more than twice the all-population average. Upon closer examination, the rate for those 20-24 is even higher at about 6.5%. This is a critical age for people starting their careers; helping them find meaningful work opportunities is an essential part of retaining talented young Vermonters.

Despite its small geographic size, different regions of Vermont have experienced very different economic outcomes. As noted above, Chittenden County and the Burlington / South Burlington Metropolitan Area were the centers of growth in both population and employment over the decade before the pandemic, mirroring a national trend of growth being focused on urban areas. Other regions of the state experienced steep declines in labor force and employment during the same period. Since the pandemic, it seems that the dynamic has changed. Population growth is more widespread, and labor force growth is more evenly distributed.

Between 2010 and 2020, Washington County (+1.0%) and the Northwest counties of Chittenden (+5.3%), Franklin (+2.2%), and Grand Isle (+3.1%) were the only areas to see an increase in the labor force. Meanwhile, Windham County's labor force declined by 11.1%, Caledonia declined by 11.4%, and Essex fell by 13.4%. Using 2022 annual data, since 2019, the largest losses have shifted somewhat. The most significant losses during that period were Windham at -6.3%, Bennington at -5.6% and Rutland at -5.0%. The most minor losses were in Addison and Caledonia, both losing 1.6%. The northwest counties of Chittenden (-2.4%), Franklin (-2.0%), and Grand Isle (-3.3%) no longer lead the state in labor force growth.

### *Labor Market Trends*

In the months after the vaccines allowed businesses and educational institutions to reopen fully, the number of job openings across the state soared to record levels. By January 2022, there were 28,000 job openings statewide, 50% higher than anything recorded before 2020. The steep post-pandemic decline in the number of unemployed persons led to the tightest labor

market the state has ever experienced. Between January 2022 and today, the number of unemployed persons per job opening has not risen above 0.5. A labor market significantly constrained by lack of supply throughout the previous decade became even more so in the post-pandemic era.

Many factors have led to these tightened labor market conditions, some of which are simple continuations of long-term secular trends. One of those is the aging of Vermont's labor force. The population over 65 in the state has increased to 21.7% and continues to grow, putting downward pressure on labor force participation rates and the labor supply.

A critical component of the state's workforce development strategy is finding creative ways to engage those reaching retirement in the labor market. Often, these methods will involve accommodations that also attract or retain people with disabilities in the labor force; these accommodating practices increased during the pandemic. While labor force participation rates have fallen for just about every demographic, one bright spot has been an increase among people with disabilities. In 2019, people with disabilities had a labor force participation rate of 44.7%. By 2022, that rate had climbed to 53.8%. Meanwhile, the unemployment rate for this cohort fell from a five-year average of 16.3% in 2021 to a rate of 10.1% by 2022.

Labor supply contracted significantly during the early stages of the pandemic and remains below pre-pandemic levels today. After a decade of slow declines, the labor force was about 352,000 in the months before the pandemic. By November of 2020, it had fallen to 331,630, a drop of 5.8%. It has rebounded somewhat over the past two years and now stands at 349,923, about half a percentage point below pre-pandemic levels. As mentioned earlier, this is actually above the expected trend. The number of unemployed persons (7,137 as of October 2023) is now around the exact figure as before the pandemic. The number of employed people is slightly lower (about 2,000).

This slight decline in the labor force despite population increases is due to a fall in the labor force participation rate. Assessing the rate by age cohort, we find that in 2019, 64.1% of the 16-24-year-old population was in the labor force. That figure fell to 61.2% in 2023. Among the prime working-age population (25-64), the rate fell from 82.3% to 81.3% over the same period. Finally, among those 65+, the participation rate dropped a bit less than one percentage point from 26.3% to 25.5%

The current labor shortage and the skills needed to meet the demand of Vermont employers over the next decade will require a focus on positions in the highest demand. Focusing the state's efforts on high-demand, high-paying occupations is a way to ensure that Vermont remains an attractive place to do business, create jobs, and entice development. The McClure Foundation report lists the jobs in Vermont that (1) have wages at or above the median wage and (2) are expected to grow above the median growth rate over the next decade, sorted by the educational attainment level typically required to hold a position. In most cases, positions that require higher levels of education pay wages commensurate with the education and skills required.



### *Education and Skill Levels of the Workforce*

In aggregate, Vermont's population is more educated than the United States population as a whole. Approximately 93% of Vermonters over 25 have a High School Diploma, about five percentage points higher than the U.S. average of 88%. 40.7 percent of Vermonters over 25 years of age have a bachelor's degree, versus a national average of 33.7%.

The primary determinant of the future workforce is, of course, the current school-age population. School-age enrollment continues to decline. Since 2004, enrollment in K-12 education in Vermont has declined almost 22%. Every county in the state has experienced enrollment declines.

As a share, Vermont's Veteran population (8.9%) is larger than the U.S. as a whole. Supporting veterans is a high priority for state government. About  $\frac{3}{4}$  of that population is pre-retirement age, and about 18% of Vermont Veterans receive disability compensation. While Vermont's overall labor force participation rate is about the same as the nation as a whole, the participation rate among Vermont Veterans (41.5%) is well below the national average of 45.6%. Some of this disparity in labor force participation can be explained by geography, with the highest concentrations of veterans living in counties with the lowest employment opportunities. 11.9% of the population of Essex County, for example, are veterans. In that county, the labor force has declined by 13.4% since 2010.

### *Analysis of barriers to employment in the Vermont workforce:*

#### **POVERTY:**

Poverty poses a multifaceted barrier to employment and advancement in Vermont, influencing individuals' access to opportunities, resources, and the ability to secure and maintain gainful employment. The 2020 Census reported that 10.4% of Vermonters are experiencing poverty.[7] Within Vermont, African Americans and working women experience higher rates of poverty than the overall population.[8]

One significant challenge is the limited access to education and training that individuals in poverty often face. Educational opportunities, vocational training, and skill development programs may be financially out of reach, hindering their ability to acquire the qualifications necessary for a competitive job market. The average annual in-state college tuition in Vermont was \$30,278 for the 2021-2022 academic year. This is \$15,148 higher than the U.S. average and ranks Vermont amongst the costliest as the 3rd most expensive and 50th most affordable state to attend college.[9] This makes the availability of affordable certificate programs and apprenticeship programs vital to maintaining accessible educational and career opportunities for all Vermonters.

Transportation is another critical factor affected by poverty, especially in rural areas of Vermont. Limited access to reliable transportation can impede individuals' ability to commute to job opportunities, restricting the range of employment options available to them.[10] This issue is particularly pronounced in rural regions with sparse public transportation infrastructure, exacerbating the challenges faced by those already grappling with poverty.[11]

The high cost of living in Vermont further compounds the impact of poverty on employment.[12] Housing affordability is a state-wide concern, and individuals with limited financial means may struggle to secure stable housing. The stress of precarious living situations can be a significant distraction, affecting an individual's focus and stability in the workplace.

Addressing poverty as a barrier to employment in Vermont requires comprehensive efforts, including initiatives to improve access to education and training, enhance transportation options, and alleviate the burden of high living costs.

### **Adult Literacy:**

In the United States, approximately 20% (1 in 5) of adults struggle to complete a form.[13] Literacy impacts income – with higher income being linked to higher literacy[14]. Among adults aged 16 – 74, Vermont has the third-highest literacy rate in the United States; however, 12.8% of Vermonters (approximately 1 in 10) have low literacy skills.[15] Even with this positive standing, even small gaps in adult literacy can present significant challenges to employment within the state and advancement opportunities for higher-wage occupations. The current high school graduation rate is 93.5%, also ranking third in the U.S.[16] However, the 2020 Census shows that approximately 30,368 Vermonters over the age of 18 do not have a high school diploma or equivalent.[17] It is estimated that 80% of the jobs in Vermont require a high school degree or higher, so preparing Vermonters with the education and literacy skills they need to fill these roles is imperative.[18]

Higher literacy rates drive job growth, advancement, and broader opportunities. Enhancing adult literacy unlocks more prospects in job searches and career training. Improved literacy rates lead to increased participation in training programs and the acquisition of new qualifications. This underscores the urgent need to boost literacy rates and provide specific and intentional resources, highlighting Vermont's commitment to supporting training and work-based learning.

Additionally, low literacy is linked to limited educational attainment, creating challenges in accessing higher education and specialized training programs. This not only impacts immediate employment prospects but also hinders career advancement tied to continuous learning and professional development. Vermont is addressing these issues comprehensively by concentrating on improving fundamental reading and writing skills. The state is implementing support systems, educational resources, and workplace initiatives to break down barriers. Literacy programs, adult education classes, and workplace training play pivotal roles in enhancing employment opportunities for individuals with low literacy levels.

Finally, in an era where technology is integral to many jobs, basic digital literacy skills are increasingly essential. A 2020 study from the Urban Institute affirms the growing urgency of foundational digital skills for all workers, including those in frontline essential roles such as home health aides and janitors.[19] Individuals with low literacy may face challenges in utilizing technology, impacting their competitiveness in various industries. Vermont recognizes the urgency of improving digital literacy across all programs and communities and emphasizes the need to offer pathways to improved digital literacy for all Vermonters.

The needs of this population are addressed primarily by the activities under WIOA title II.

## **Justice Involved (also referred to as “Ex-Offenders”):**

*(federal definition: a participant who has been subject to any stage of the criminal justice process for committing a status offense or delinquent act OR has an arrest record or conviction)*

The corrections system in Vermont creates significant barriers to employment for those who have been incarcerated. Currently, there are 1,333 people in Vermont's correctional facilities.[20] Notably, 65% of individuals in custody haven't been convicted and are held pre-trial or have served their minimum sentence but remain detained beyond their release date.[21] This results in removing a substantial number of individuals from the labor force, adversely affecting their current and future employment prospects. Additionally, 3,871 people are currently on community supervision in Vermont.[22] While they have greater access to the labor market, providing additional support can ensure they fulfill their career potential.

One major challenge for those leaving the corrections system is the stigma attached to a criminal record, leading to bias in employers. This bias often excludes a significant talent pool from job opportunities.[23] Reentry into the community after incarceration is complicated by limited access to education and vocational training within the corrections system, hindering skill development for gainful employment. The lack of preparation during incarceration perpetuates unemployment and increases the risk of recidivism.

Securing stable housing post-release is another hurdle. In addition to a lack of available and affordable housing, individuals face discrimination in housing applications and the lack of a stable address, which further impedes the job-seeking process. In some career fields, occupational licensing restrictions may limit career options for individuals with a criminal history. Addressing these issues can lead Vermont toward a more equitable and rehabilitative approach to workforce reintegration for those with a history of incarceration.

This percentage decreased between P.Y. 22 (9.9%) and P.Y. 21 (12.1%) for WIOA Adult participants; however, the number increased for Dislocated Worker participants between P.Y. 21 (2.7%) and P.Y. 22 (12.9%). The rate for ex-offenders in the Youth program remained steady at 5% of both P.Y. 21 and P.Y. 22 participants. In the Wagner-Peyser program, there was a small decrease in those who reported as an ex-offender between P.Y. 22 (7.7%) vs. P.Y. 21 (8.2%)

## **Individuals Experiencing Homelessness:**

The rate of homelessness in Vermont was the second highest in the U.S., according to the 2023 Annual Homelessness Assessment Report released by HUD.[24] An estimated 3,295 people, or 51 out of every 10,000 people, were experiencing homelessness in Vermont during the point-in-time count in January 2023.[25] It is also notable that this same count showed that 10.7% of people reported they were fleeing domestic or sexual violence.[26] Additionally, a disproportionate amount of people identified as Black or African American compared to state demographics; 6.9% were Black or African American, compared to 1% of the state population.[27]

Homelessness in Vermont serves as a profound barrier to stable employment, impacting individuals' ability to secure and maintain jobs in various ways. One of the most immediate challenges is the lack of a stable address, one of many ways that the absence of secure housing complicates the routine aspects of job-seeking. Maintaining personal hygiene, storing

professional attire, and having a consistent place to prepare for interviews are additional challenges for individuals without stable housing.

The homelessness situation in Vermont not only reflects a local challenge but also has broader implications for the labor market. The rise in homelessness across most Vermont counties, and particularly the notable increase in Rutland County, points to a growing concern that impacts the state's labor dynamics.[28] As Vermont grapples with a housing crisis, addressing homelessness becomes not only a social imperative but also an economic necessity. Stable housing is fundamental for workforce stability and productivity. Comprehensive strategies that integrate housing solutions with employment support are crucial for mitigating the negative effects of homelessness on Vermont's labor market and fostering a more resilient and prosperous community.

Homelessness often coexists with mental health challenges and substance abuse issues. The stress and uncertainty of living without a stable home can exacerbate these issues, impacting an individual's ability to perform well in the workplace. The lack of consistent access to healthcare further compounds the problem, as untreated physical and mental health conditions can hinder employability.

Addressing homelessness as a barrier to employment in Vermont requires a multifaceted approach. Efforts focus on providing stable housing options, improving access to supportive services, and fostering collaboration between social services and employers to create more inclusive hiring practices. By addressing the root causes of homelessness and providing comprehensive support, Vermont can break down the barriers preventing individuals from experiencing stable, meaningful employment.

The percentage of WIOA Adult participants who reported being homeless increased by 3.2% from P.Y. 21 (4.7%) to P.Y. 22 (7.9%). Youth homelessness also increased in P.Y. 22, but by a smaller margin (7.4% vs. 6.3% in P.Y. 21). The same smaller but upward trend is also mirrored in Wagner-Peyser participants. In P.Y. 22, 6.2% of participants reported being homeless, compared to 5.6% in P.Y. 21.

Increases in WIOA participants experiencing homelessness are expected. Vermont's lack of affordable housing has been a growing trend in recent years, as has the overall number of homeless individuals. Enrollment periods tend to be longer for homeless individuals as case managers focus on several different needs of the individual in addition to employment, including safe and affordable housing.

The State Workforce Development Board and the core partners intend to follow the recommendations of the Vermont Council on Housing and Homelessness's 2023 Tactical Action Plan, which was released in December 2023. This Tactical Action Plan aims to address training, development, and other issues affecting the workforce that support homeless and unhoused populations across Vermont.

### **Individuals with Language Access Needs or Facing Substantial Cultural Barriers:**

Vermont has long been a destination for refugee resettlement. During the 20-year period from 1989 to 2019, Vermont welcomed 7,956 Refugees. They add much to our vibrant communities: working, learning, and contributing to the Vermont economy. According to the State Refugee Office, Vermont has two resettlement agencies: the U. S. Committee for Refugees and

Immigrants (USCRI) and the Ethiopian Community Development Council (ECDC). There are four official resettlement sites: Colchester, Rutland, Brattleboro, and Bennington.

According to the American Immigration Council, about 5% of Vermont residents and foreign-born. 2.1% of U.S.-born residents live with at least one immigrant parent. Immigrants comprise 5.8% of Vermont's labor force; a little over a third (approx. 37%) of the immigrant population is male, while the remaining two-thirds (approx. 63%) are women.

Vermont's immigrant community contributes approximately \$438.5 million in taxes, while their combined spending power is about twice that. When further dissecting the immigrant population, we find that 62.8% are women and 37.5% are men. The biggest age group in the immigrant population is in the 16-64 age bracket, with 70% of immigrants falling within that range.

The top originating countries were:

- Canada (20%)
- Nepal (7%)
- Jamaica (6%)
- Philippines (6%)
- Bosnia & Hercegovina (5%)

The State Workforce Development Board and the WIOA core partners acknowledge the diverse origins and cultural backgrounds of immigrants arriving in the state. Despite their varied upbringings, these individuals share a common imperative: the urgent need for employment upon their arrival. In response to these challenges, the WIOA core partners and extended partners in the resettlement communities coordinate with employers to connect new arrivals to job opportunities and relevant training/skill development to assist in all aspects of resettlement. Looking forward, the core partners will continue to support and expand these collaborative efforts, aiming to provide sustained and comprehensive support for immigrants and refugees as they navigate resettlement.

Some of the biggest challenges facing new Vermonters/new Americans when securing employment are language barriers, unreliable transportation, and a lack of credential portability and recognition from their country of origin. Despite the numerous challenges they face, immigrants place a significant emphasis on accessing education, viewing it as a pathway to a better future. The statistics underscore this commitment: 50% percent of all immigrants possess a college degree or higher, 22% have completed some college, and 17% hold a high school diploma.

The lack of Citizenship can also make immigrants an easy target for discrimination and exploitation in the workplace. Many refugees are nervous to reach out for government help for fear of being deported. Many refugees suffer from mental health issues as well after being exposed to dangerous conditions that they fled from.

The State Workforce Development Board, with an allocation of funds from the General Assembly, will be securing a contract for an entity to map the network of support for immigrants, new Vermonters/new Americans, and others with language access needs. The

purpose of the map is for partners and the public to be able to quickly identify available resources and to identify gaps in where those resources are located.

The WIOA Adult, WIOA Youth, and Wagner-Peyser programs all recorded an increase in the percentage of individuals who were reported with one or more of these barriers. The largest increase was for WIOA Adults, with an increase of 7.4%. This was the trend for Youth participants, with an increase of 6.4% between P.Y. 21 (39.9%) and P.Y. 22 (46.3%)

### **Opioid Misuse:**

The opioid crisis in Vermont has had significant implications for the state as a whole, with the labor market being no exception. As indicated by data from the State Unintentional Drug Overdose Reporting System (SUDORS), between January 2019 and June 2022, there were 635 fatal overdoses among individuals 15 or older.[29] The average age of those who died as a result of an overdose during this period was 42 years old, with the 35-44 age group experiencing the highest number of overdose deaths.[30] This data highlights the prevalence of opioids in fatal overdoses, particularly amongst those in their prime working years. Additionally, a 2020 report funded by the U.S. Department of Labor reported that as opioid use increases, there is a marked reduction in labor force participation.[31]

While Vermont has seen a sharp uptick in opioid misuse over the past few years, the opioid crisis has impacted employers nationwide, with 75% of employers expressing that their workplaces have been affected by opioid-related issues.[32] Employers are worried about challenges such as finding qualified workers who can pass drug screenings, increased healthcare costs, higher absenteeism, and decreased productivity. Additionally, employers have expressed safety concerns as opioid misuse may contribute to workplace injuries.

Vermont is addressing opioid misuse's impact on the labor market through targeted solutions. This includes specialized employment programs for recovery support, collaboration with employers to create inclusive hiring practices, and investments in vocational training. These measures aim to reintegrate individuals into the workforce, reduce stigma, and equip those in recovery with the skills needed for employment.

### **Individuals with a Disability:**

Over 12% of Vermont's 18-64-year-old population have a disability that has a serious impact on hearing, vision, cognition or ambulation. These disabilities serve as a significant barrier to employment in modern Vermont; the labor force participation rate among prime working-age people with disabilities (46.5%) is significantly lower than that of the non-disabled population of the same age cohort. Meanwhile, the unemployment rate of that same cohort with disabilities stands at 10.1%, almost exactly three times the rate (3.4%) for the same-age cohort with no disability.

While the labor force participation rate of people with disabilities is low, it appears that the pandemic response has opened doors to employment. Accommodations that once seemed beyond the reasonable realm to most employers have become the norm in many industries, especially those that do not involve direct contact with others. Telework and schedule flexibility have opened employers' minds to various accommodations for people with disabilities. Between the 2019 one-year estimate and the 2022 one-year estimate, the labor force participation rate of those with a disability between 18 and 64 increased from 44.7% to 53.8%.

The state hopes to capitalize on this trend by continuing to advocate and provide services that directly connect employers with skilled and talented people with a wide range of disabilities. Most of this work is done by the two organizations discussed below.

HireAbility and the Division for the Blind and Visually Impaired are the primary employment services providers for people with disabilities in the state. They provide highly individualized services, beginning with an Individual Plan for Employment (IPE) which addresses the individual's employment goals and support services to be provided. The Division also utilizes an outreach program, Creative Workforce Solutions, to connect businesses with individuals seeking employment. This personalized approach allows account managers to work directly with both employers and potential employees to ensure the needs of both are met.

The Vermont Division for the Blind and Visually Impaired (DBVI) provides specialized services for individuals experiencing blindness or visual impairment. They offer various services that help individuals learn to properly use assistive technologies as part of a broader holistic approach. The overall goal is to help these 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.

The needs of this population are primarily addressed by WIOA Title IV.

For WIOA Adult participants in Program Year (PY) 2021, nearly a third (30.3%) self-identified as having a disability. In P.Y. 2022, that figure was slightly over a quarter (25.8%).

Dislocated Worker (DLW) participants self-identifying as disabled dropped 1% in P.Y. 22 to 12.9%.

In P.Y. 22, the percentage of Youth participants who self-identified as having a disability dropped to 64% from 79.7% in the prior program year. For the Wagner-Peyser program, in P.Y. 22, 18.9% of participants reported having a disability, whereas that figure in P.Y. 21 was 20.3%.

An interesting observation in the WIOA data is the significantly higher percentage of Youth participants who self-identify as having a disability compared to the Adult, DLW, and Wagner-Peyser participants. Anecdotally speaking, this could be attributed to the number of Youth who self-identify as having a learning disability as compared to other categories of disabilities. VDOL case managers who work with Youth are cognizant of the individual's school status when they meet. In these discussions, learning disabilities are usually brought forward, whereas adult participants may not be as likely to volunteer disability or category of disability information or may not consider themselves as having a disability even though they may have a qualifying disability.

[1] Unites States Decennial Census. U.S. Census Bureau

[2] American Community Survey. United States Census Bureau

[3] Current Employment Statistics. Economic & Labor Market Information Division, Vermont Department of Labor

[4] Local Area Unemployment Statistics. Economic & Labor Market Information Division, Vermont Department of Labor

[5] Local Area Unemployment Statistics. Economic & Labor Market Information Division, Vermont Department of Labor

[6] Current Population Survey. United States Census Bureau

[7] Defined as percentage of people who had incomes below the poverty line (\$25,926 for a family of four) in 2019. U.S. Census Bureau QuickFacts: Vermont

[8] 33.3% of African Americans in Vermont experience poverty; 13.5% of working women experience poverty compared to a statewide average of 10.4%. Vermont Report - 2020 - Talk Poverty

[9] CollegeSimply. *Cost of colleges in Vermont*. <https://www.collegecalc.org/colleges/vermont/#:~:text=How%20much%20does%20it%20cost%20to%20attend%20college,most%20affordable%20state%20or%20district%20to%20attend%20college>

[10] On average, workers in Vermont have a 23-minute commute to work, compared to the national average of 27 minutes, according to the U.S. Census Bureau.

[11] People who live in the rural Northeast Kingdom have the longest commutes with the highest number of people with commutes exceeding 90-minutes, according to the U.S. Census Bureau.

[12] In 3rd quarter 2023, the cost of living index for Vermont was 114.9, with an index over 100 indicating a higher-than-average cost of living. Vermont Cost of living index, 1998-2023 - knoema.com

[13] U.S. Department of Education, Office of Career, Technical, and Adult Education. (2015, February) Making Skills Everyone's Business: A Call to Transform Adult Learning in the United States.

[14] Michigan Journal of Economics. (2023, January) The Relationship between Socioeconomic Status (SES) and Literacy: How Literacy is Influenced by and Influences SES.

[15]BBFFL-Literacy-Card-VT.pdf (barbarabush.org)

[16] 2020 U.S. Census data

[17] 2020 U.S. Census data. Census Bureau Tables

[18]WORKFORCE & TALENT - (vtfuturesproject.org)

[19][https://www.urban.org/sites/default/files/publication/100843/foundational\\_digital\\_skills\\_for\\_career\\_progress\\_2.pdf](https://www.urban.org/sites/default/files/publication/100843/foundational_digital_skills_for_career_progress_2.pdf)

[20] As of 12/21/2023 per the Vermont Department of Corrections. Pop\_Count\_12-22-2023.pdf (vermont.gov)

[21] Vermont Department of Corrections population count on 12/30/22 and Violent Crime Report on 12/31/22.



[22] As of 11/30/2023 per the Vermont Department of Corrections. Community Supervision includes parole, probation, furlough, and the Community Restoration Program. CommunitySupervisionPopulationReport\_11\_30\_2023.pdf (vermont.gov)

[23] Studies have shown that having a criminal record reduces employer callback rates by 50%.- 9 Myths About Hiring People with Criminal Records | The ILR School (cornell.edu)

[24]The 2023 Annual Homelessness Assessment Report (AHAR to Congress) Part 1: Point-In-Time Estimates of Homelessness, December 2023 (huduser.gov)

[25]Rate of homelessness in Vermont remains 2nd highest in U.S. in 2023 | VHFA.org - Vermont Housing Finance Agency

[26]Microsoft Word - Vermont Point in Time Report 2021.docx (helpingtohousevt.org)

[27]Microsoft Word - Vermont Point in Time Report 2021.docx (helpingtohousevt.org)

[28]Rate of homelessness in Vermont remains 2nd highest in U.S. in 2023 | VHFA.org - Vermont Housing Finance Agency

[29] Vermont Department of Health- Division of Substance Abuse) Fatal Overdoses in Vermont by Age and Circumstance (healthvermont.gov)

[30] Vermont Department of Health- Division of Substance Abuse) Fatal Overdoses in Vermont by Age and Circumstance (healthvermont.gov)

[31] "In counties where more opioid pain medication is prescribed, fewer prime-age men and women are in the labor force. "The

[32]The Role of the Workforce System in Addressing the Opioid Crisis: A Review of the Literature (dol.gov)

**C. COMPARISON OF ECONOMIC AND WORKFORCE ANALYTICAL CONCLUSION. DESCRIBE AREAS OF OPPORTUNITY FOR MEETING HIRING, EDUCATION, AND SKILLS NEEDS IDENTIFIED IN THE ECONOMY COMPARED TO THE ASSETS AVAILABLE IN THE LABOR FORCE IN THE STATE.**

Vermont's small geographic size and slow population growth, paired with an increasingly aging population and low unemployment rate, create an economic and workforce environment that requires the state's workforce development system to focus on bridging the needs of individuals with significant barriers to employment with the needs of employers. As described in the sections above, Vermont's opportunities for meeting hiring, education, and skill needs in this plan are in the realm of supporting businesses in changing hiring practices and generally using subsidized on-the-job training and other workforce development tools to help shifts in employer policies and practices (e.g., hiring, wages, benefits, work-life balance, advancement opportunities), especially those related to those populations identified in the State Workforce Development Board's goals (e.g., individuals in transition, justice-involved, older workers). As employers struggle to find the supply of workers they need to meet the demands of their business, there is less of a focus on credentials and other skill proxies in the hiring and selection process and more of an emphasis on developing skills through "earn while you learn" training models to give job seekers practical experience where it may not exist, and individual training accounts, when there are job seekers interest in pursuing credential training.

## 2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce, as identified in (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of—

### A. THE STATE'S WORKFORCE DEVELOPMENT ACTIVITIES

Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required <sup>6</sup> and optional one-stop delivery system partners.<sup>7</sup>

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

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

### B. THE STRENGTHS AND WEAKNESSES OF WORKFORCE DEVELOPMENT ACTIVITIES

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

### C. STATE WORKFORCE DEVELOPMENT CAPACITY

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

As the state prepares to receive historic federal investments made possible through the Infrastructure Investment and Jobs Act (aka the Bipartisan Infrastructure Law (BIL)), the Creating Helpful Incentives to Produce Semiconductors (CHIPS) and Science Act, and the Inflation Reduction Act (IRA) (collectively referred to as Investing in America (IIA)), Vermont is also focused on increasing the labor force participation rate; connecting workers who are new to Vermont to resources, training opportunities, and employers; easing the transition of young people from school or college to the workforce; up-skilling incumbent workers; and, perhaps most importantly, on strengthening partnerships both within and outside state government.

The Governor and State Workforce Development Board (SWDB) established the vision for the public workforce development system: Vermont's employment demands will be met through a state-wide, coordinated, and integrated system of workforce education, training, and development where all Vermonters can connect to robust career pathways, advance along the career ladder and new Vermonters can quickly secure employment with a Vermont employer.

As the lead agency in the public workforce system, the Vermont Department of Labor (VDOL) is important in coordinating activities with state agencies and non-government partners that have never been directly involved in the public workforce system. The core partners in the system, which are the Vermont Department of Labor, the Agency of Education, HireAbility, and the Division for the Blind and Visually Impaired, strive to achieve these high-level goals, giving prioritization, emphasis, and special planning consideration for:

- Individuals who live in rural communities,
- Individuals who are experiencing homelessness,
- Individuals who are living below the Federal poverty line,
- Individuals who are at transitional points in their working lives,
- All business and industry, including small business.

Vermont can only meet workforce demands by adding nearly 10,000 new workers to the workforce every year by 2040. The SWDB's strategic plan sets out a path for the state to achieve that goal. In addition to the goals outlined in the WIOA state plan, the strategic plan focuses efforts in four areas:

1. Increasing labor force participation by re-engaging those who are disconnected from the workforce;
2. Creating and expanding programs and services aimed at engaging and connecting employers and Immigrants, Asylees, and New Americans;
3. Connecting "soon to graduate" high-school and college students to employers;
4. Upskilling incumbent employees to help them advance in their careers.

Across the entire workforce ecosystem, partners are focused on building, fostering, and executing a sustainable and strategic education and workforce vision. One challenge that persists post-pandemic is a lack of available workers, which means partnering agencies must work together to reach and attract disengaged workers from the employment and workforce development systems, especially those with significant barriers to employment.

Partners with the Department of Corrections have been working on an adult re-entry employment support system (ARES) grant, along with policy changes implemented by the Vermont General Assembly that created the foundation for work to transform how the State supports justice-involved individuals before and after their transition outside a correctional facility.

The partnership between the State government, community partners, and the Department of Corrections (DOC) continues to strengthen through activities piloted around the state. Work to provide cross-agency training on program requirements between VDOL regional workforce staff, case managers, DOC leadership, and local probation and parole staff continues.

Exciting work continues, in partnership with the Agency of Commerce and Community Development, to increase the number of visitors who eventually relocate and to increase the number of out-of-state college students who stay in Vermont. The pandemic gave Vermont a unique opportunity to attract new people who could work remotely and escape densely

populated areas. Some worked remotely for companies outside of Vermont, but there were often trailing partners or spouses who needed employment. Work dedicated to promoting Vermont to out-of-state job-seekers as a great place to Live, Work, and Play will continue.

VDOL's Jobs for Veterans State Grant (JVSG) staff continue to think creatively about how to connect with and attract Veterans and existing military members and their families to the state. As part of the JVSG program, staff participate at job fairs at Fort Drum, NY. JVSG staff also share information about the SkillBridge program with interested businesses. In service to Veterans, Registered Apprenticeship program staff work with the Vermont Office of Veteran's Affairs to help Veterans and eligible dependents access their post-9-11 GI benefits.

With approximately 95% of Vermont's workforce development services provided through federally-funded programs, the State departments and agencies implementing the programs are highly focused on finding ways to work collaboratively to meet the aims of the programs while working together to support better the specific needs of Vermont's workers and employers. What follows are descriptions of the specific One-Stop services provided by the core partners: VDOL (Title I & III), AOE (Title II), and VR & DBVI (Title IV).

### **VDOL Workforce Development, Education, & Training Activities**

Vermont Department of Labor's (VDOL) Workforce Development Division (WD) provides services through the One-Stop American Job Center (AJC) Network, which includes the state's single certified comprehensive center in Burlington, eleven affiliates and satellite One-Stop Career Centers operated by VDOL throughout the State, and dozens of other sites across the state where WIOA partner programs deliver services. We supplement in-person service delivery with virtual access points through Vermont Job Link (VJL), virtual office hours, and scheduled meetings with case managers.

VJL is Vermont's online career, employment, and resource center. It gives job-seekers and employers virtual access to many services available through the One-Stop network. Users can view current labor market information, research training, and education opportunities and resources, explore career pathways, access employment preparation tools, workshops, or information, and post or explore current job postings. VJL also serves as VDOL's case management system, performance tracker, and reporting tool. Vermont's One-Stop service delivery system provides self and staff-assisted services so that workers, job-seekers, and businesses can locate and access resources to fulfill their employment needs.

VDOL's WD Division administers the following federal programs: WIOA Titles I and III, Jobs for Veterans State Grant (JVSG), Trade Adjustment Act (TAA), Foreign Labor Certification (FLC) support, Work Opportunity Tax Credit (WOTC), the Registered Apprentice (RA) program, Migrant and Seasonal Farmworker (MSFW) outreach, and the Mine Safety and Health Administration (MSHA) grants.

VDOL WD Division works hand in hand with other divisions in the Department, including Unemployment Insurance (UI) and Re-employment Services and Eligibility Assessment (RESEA), Labor Market Information (LMI), Wage & Hour, and Workers' Compensation's Re-Employment Services and Eligibility Assessment (RESEA) program.

Over the last four years, the Vermont AJC network experienced a significant decline in job-seekers walking through our doors to receive place-based services. We strive to effectively provide employment and training services to four generations of Vermonters, and we are working to learn how and where they want to access services.

AJC staff are expected to be in the community, not just present in our offices. “Labor on Location” is an initiative that allows the VDOL WP/WIOA team to meet customers where they are literally. Person-to-person meetings occur in local libraries, community centers, food shelves, and other locations throughout the state.

As service delivery continues to evolve to meet the needs of the modern job-seeker, VDOL looks to the future: a staffed, fully virtual job center and a future of applications (APPS) that provide on-demand information or services with the touch of the finger. VDOL plans to explore and utilize the many technological advancements that exist and make investments where needed to attract customers - both job-seekers and businesses.

With a historically low unemployment rate, Vermont businesses have become the prominent customer, reaching out to VDOL for support in solving their workforce challenges. Businesses have traditionally worked with staff to post job openings on our job board, search for and screen applicants, conduct hiring events and job fairs, access current labor market information, hire interns, develop paid and subsidized on-the-job training experiences, access information about tax credits, find support to avoid layoffs, tap rapid response services, learn about grants for job training for new and incumbent workers, and gain assistance with employment and labor law questions.

To continue to meet the customer's needs, VDOL has increased its emphasis on Business Services by hiring a dedicated Business Services Manager and forming a dedicated Business Services Team (BST). The BST will receive training to provide consultative business services across the business cycle. This work will rely on strong partnerships with business outreach staff at the Agency of Commerce and Community Development and other core WIOA partners.

Our pivot to better support and meet the needs of business customers will incorporate insights gleaned from emerging research and resources on “worker voice.” The pandemic changed how workers think about work and what they expect from employers. Employers need to know this and receive support in changing practices where possible. Support for businesses will also include providing information about the “good jobs principles,” reinforcing the idea that employers’ policies and practices drive worker recruitment and retention.

For job-seekers, services include skill assessment, skill training, labor market information, career counseling, and job placement assistance. Vermont is focused on providing subsidized/paid OJT experiences for eligible participants. These experiences give the employer a chance to see job-seekers' work ethics and give the job-seeker a chance to try a job they might not have otherwise considered. Registered Apprenticeships are also a growing tool for businesses to train workers coming to them with little to no training or knowledge of the industry or occupations in the business. We are positioning Registered Apprenticeships as a tool for companies to attract workers in a tight labor market.

Recent legislative updates to Vermont's Registered Apprenticeship law create multiple opportunities to develop on-ramps from schools and colleges and for new Vermonters to gain an accelerated path to completion in a Registered Apprenticeship program. Vermont will build

pre-apprenticeship and youth apprenticeship programs by reinforcing relationships between regional CTE centers, community-based organizations, and employer sponsors with registered apprenticeship programs.

We believe paid work experiences in high-quality on-the-job training programs are the best way to reengage disengaged workers and support the transition of more experienced workers from one career or industry to another. It's also important that employers providing these work-based learning and training programs comply with federal and state labor laws and that the focus is learning, not just working.

In accordance with the directives of the Governor and to increase the effectiveness of the services offered through state government, a "no wrong door" approach has been infused into the Vermont workforce ecosystem. Although Vermonters with the highest economic need and those facing barriers to employment continue to be VDOL's priority, we welcome all Vermonters to access our no-cost services. The "no-wrong door" approach requires constant collaboration, training, and resource documentation. Technology will assist with the "no-wrong door approach," especially when implementing a common intake process and technologically assisted referral system.

VDOL envisions building a strong and effective professional network amongst the workforce system partners as they experience common challenges and professional development needs. Challenges identified in unison are common intake, assessments, and data sharing. Professional development needs that have been consistently identified are trauma-informed, mental health, working with incarcerated individuals, effective support for the neurodivergent job-seeker, working with individuals with disabilities, new Americans, and post 911 era Veterans.

With oversight and guidance from a new One-Stop Operator, we expect to improve the case management process between the core and extended partners, improve the experience of participants, and ultimately increase the number of young and mature Vermonters who can easily access education and training. This will start with a campaign to promote and market career pathways that support Vermont's current employer needs and prepare the workforce with the skills needed to support future expansion.

### **Adult Education and Literacy Activities**

Adult Education and Literacy (AEL) programs serve adults who are 16 years old or older and not enrolled in school, lack a high school diploma or an equivalent, are deficient in basic skills, or are English Language Learners (ELLs). Instruction is provided from the lowest skill level in adult basic education to adult secondary education and English to ELLs in the basic skills of reading, writing, math, and speaking/listening. The purposes of the program are to assist individuals in strengthening their academic skills, obtaining a high school diploma or GED, obtaining employment, and successfully entering post-secondary education or training. Services are funded by federal and state grants awarded to eligible agencies via open funding competitions.

Under WIOA, AEL providers are awarded through the Vermont Agency of Education's competitive process 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 so that they can persist in their studies (e.g., evening hours, group and individual instruction, distance education). Grant-funded AEL providers are required to develop and implement Integrated Education and Training (IET) programs for educational and career advancement in specific occupations or occupational clusters. The IET service approach provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training within those occupations or clusters.

Students are eligible to earn a regular high school diploma from their district 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 (as determined by federally-approved assessments) take, on average, ten months to earn their high school diploma. Alternatively, students have the option of preparing to earn a GED certificate, which aligns with the College and Career Readiness Standards. The GED is a valuable educational option for some adult learners, as completing a computer-based test requires developing basic technology skills.

The Division of Vocational Rehabilitation's (DVR's) mission is to help Vermonters with disabilities prepare for, obtain, and maintain meaningful careers and to help employers recruit, train, and retain employees with disabilities. Consumer choice and self-direction are core values that drive DVR's approach to providing services and developing new programs. DVR's ability to help jobseekers succeed also depends on clearly understanding the needs of our other customers: employers. To better reach our consumers and employers, in SFY 2022, DVR rebranded as HireAbility and launched a marketing campaign to promote our services for both audiences. The HireAbility rebranding also reinforces our commitment to helping consumers access high-wage and high-quality careers through training and education. It also communicates our goal of being a source of motivated and trained employees for Vermont employers.

### **Division Overview**

HireAbility serves people with disabilities in Vermont who face barriers to employment. We help HireAbility consumers determine what career pathways will work for them through assessment, counseling, and guidance. We use our extensive networks in the employer community to create job opportunities, match employer needs with jobseeker skills, and help employers retain staff with disabilities. We also invest heavily in post-secondary training and education to help our consumers gain credentials that will lead to high-wage and high-quality employment.

### **Staff and Partners**

HireAbility has about 130 staff located in 12 district offices around the state. We collaborate with other service providers to reach people with disabilities facing challenges to employment. HireAbility has created partnerships with multiple organizations to serve youth, offenders, Veterans, people receiving public benefits, and those who need ongoing support.

All HireAbility services are highly individualized. We developed some specific programs and initiatives to meet workforce needs better. HireAbility uses a dual-customer approach that

promotes meeting the needs of both employers and consumers. Our primary interface with the business community is through its 13 business account managers housed in twelve Agency of Human Services districts, who coordinate with local employer outreach teams. HireAbility 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 local business account managers.

HireAbility is a strong supporter of the WIOA Common Performance Measures. We believe the measures support participants' career goals and promote higher wages and more sustainable employment. However, the WIOA measures are extremely lagging, meaning most of the desired outcomes occur well after services end. For example, the measure of median earnings occurs two full quarters after case closure. As a result, the measures are not very useful in guiding the work of frontline staff on a day-to-day basis. Therefore, in 2020, HireAbility established leading measures expected to improve the longer-term WIOA outcome measures. These measures are visible to all staff in real-time through a Dashboard. Since the implementation of the Dashboard, HireAbility has seen considerable improvement in both the leading measures and the Common Performance Measures. In 2023, HireAbility updated the leading measures based on field experience and made the targets more ambitious and aspirational. We also included some intermediate performance outcome targets. The following is a list of the leading measures and outcome targets and how they are expected to positively impact the lagging outcome measures:

### **The Leading Measures**

- **Sustained Teaming:** The involvement of other team members (employment placement staff, Certified Work Incentive Counselors, and others) over the life of the case strengthens participant engagement in completing their employment goals. This measure assesses whether multiple team members are engaged with the participant throughout the life of the case.
- **Career Assessments:** The use of career assessment tools supports exploration and better matches between consumers and higher wage and higher skill employment options. High-quality career assessment tools can help participants identify meaningful career pathways.
- **Credential-Focused Education and Training:** Education and training are the best options we can provide to help participants achieve high-wage and high-quality careers. Even relatively short-term training programs can dramatically increase a participant's earning levels.
- **Work-Based Learning Experiences:** Paid work experiences are often a highly effective way of introducing participants with little or no work experience to employment. This includes students and youth as well as adults who have been out of the workforce for extended periods of time. Paid Work Experiences offer a low-risk way for participants to take the first step toward competitive employment. Paid Work Experiences can also be an effective way for participants to explore new career pathways before they commit to credentialed training. For example, a participant interested in HVAC training might use work experience to determine if it is a good career match.



- **High Wage Plan Goals:** The participant and the counselor set the employment goal in the plan. Participants sometimes have low expectations of what is possible or have never considered higher-wage career goals. Vocational counselors encourage participants to consider higher wage plan goals in occupations they may have never considered.
- **Sustained Follow-Up:** Continued support and encouragement after job placement results in better job retention and career advancement.

HireAbility has launched two additional initiatives to support career pathways for people with disabilities. These include the Vermont Career Advancement Project and the Career Training Offset program.

The Vermont Career Advancement Project (VCAP):

HireAbility was awarded a \$6.5 million grant from the US Department of Education to support the Vermont Career Advancement Project (VCAP) in 2021. VCAP has established a robust partnership between HireAbility, the Vermont Department of Labor (VDOL), the Community College of Vermont (CCV), Vermont Technical College (VTC), and secondary Career and Technical Education Centers (CTEs), to build on-ramps enabling individuals with disabilities to pursue high quality, good-paying careers. The project has embedded dedicated Career Pathways Student Advisors in these post-secondary programs to provide intensive support for VCAP participants. VCAP has also partnered with other workforce development organizations to expand paid, credentialed occupational training programs in response to employer needs.

Utilizing the best available employment projections from the Vermont Department of Labor for high-quality, high-wage career pathway opportunities, the state identified the following five career sectors for the project: Advanced Manufacturing, Financial Services, Healthcare, Skilled Construction Trades, and Information Technology. VCAP is utilizing HireAbility’s extensive network of employer contacts through its Business Account Managers to engage employers in offering opportunities in these sectors. CCV and VTC, which have program development experience and expertise, serve multiple roles in multiple registered state-wide apprenticeship programs. These programs are linked directly to secondary and adult programs offered through the State’s 17 Career and Technical Education (CTE) centers. The project will enroll a total of 500 participants, with 375 earning industry-recognized credentials and 75 registering as apprenticeships. 75% of participants will exit their training programs employed and earn at least 150% of the state’s minimum wage.

HireAbility started enrollment in VCAP in August 2022. To date, 243 individuals have been enrolled in the program. 65 have achieved their planned educational goals, including 19 vocational/technical certifications or industry-recognized credentials. There are also an additional 109 VCAP participants who are working on their educational goals, 42 of whom are enrolled in CCV. Our most common goals among VCAP participants are nursing, heavy and tractor-trailer truck drivers, and substance use and behavioral disorder counselors. To date, we have had 6 participants exit the program successfully.

Career Training Offset (CTO):

HireAbility has long recognized that many of our participants cannot engage in industry-recognized credential training programs because they cannot afford to stop working. As a result, they remain in entry-level employment without the training and skills to move up the career

ladder. To address this issue, HireAbility implemented the Career Training Offset (CTO). Participants enrolled in training that leads to an industry-recognized credential are paid minimum wage for classroom and unpaid instruction time. For example, an HVAC (Heating, Ventilation, and Air Conditioning) program has approximately 144 hours of unpaid training time. HireAbility will pay the participants minimum wage for these hours to ensure they have a steady source of income while they get trained.

Between October 2022 and September 2023, 71 participants started training programs with support from the CTO. To date, 68 participants have successfully completed a CTO-supported training program. Thirty-six participants who participated in a CTO are currently employed in their intended field or were at the time their cases closed. CTO participants engage in a wide range of training programs, with bookkeeping, CDL training, cosmetology, and LNA programs being the most frequently completed.

### **Workforce Development Activities: Strengths**

Vermont acknowledges the following as strengths & opportunities in its workforce development system:

Policy & Legislative Support. There is great support and interest in the General Assembly and the Governor's Office for addressing workforce education and training and reversing the demographic trends caused by an aging population and a shortage of jobs. The political will exists to make changes to the governance and operation of the system. Stakeholders are united in focus on quality and ease of service delivery, expansion of the state's labor force, access to services for job-seekers and employers, responsiveness to employment demands, and building better supports for individuals with barriers to employment.

Intimate, Individualized Services. Core partner programs are highly accessible to individuals and program participants. Individuals rarely encounter wait times in program centers across the state.

Structural Familiarity. For the most part, core WIOA services are managed by staff at the state and local levels who have collaborated closely for a long time and are accustomed to things working the way they have worked for long periods of time. This contributes to a lack of willingness to embrace necessary changes in system transformation to serve the public better and ensure a more effective workforce development system.

Program Accessibility. Many One-Stop partners are already co-located in inaccessible offices across the state. WIOA partners have increased their service time in locations convenient to customers (local career centers, recovery centers, correctional institutions, educational institutions, etc.).

Strong Employer Partnerships. The state workforce programs have a strong emphasis on the employer as a customer. Business services are offered directly to employers and promoted through intentional engagement with economic development partners and community organizations and leaders. The state has taken active steps to better align its economic

development and workforce development support for businesses and will continue those efforts over the next four years.

### **Workforce Development Activities: Weaknesses**

Declining Labor Force. Vermont's population is aging and getting smaller. Vermont's unemployment rate is at a historic low. These create pressures for employers in the labor market. There are not enough workers. A labor force shortage stresses the state's workforce development system because the resources and program services that are available, as a 95% federally funded system, aren't always the ones that employers and job-seekers need in this market.

Rural Landscape. Although workforce services are highly accessible, some areas of the state still suffer from a lack of physical and technological infrastructure that makes serving customers in these areas more difficult.

Brain Drain. Retirements, staff turnover, vacancies, and related staffing disruptions contribute to substantial knowledge and relational deserts that take time and technical assistance to remedy. Additionally, deficits in technology infrastructure, database systems, and IT programs make efficiently building and upscaling much more challenging.

Structural Familiarity. For the most part, core WIOA services are managed by staff at the state and local levels who have collaborated closely for a long time and are accustomed to things working the way they have worked for long periods of time. This contributes to a lack of willingness to embrace necessary changes in system transformation to serve the public better and ensure a more effective workforce development system.

Scale. As a single-area state with formula funds set at the "small state minimum," the State must dedicate a disproportionately higher amount of funding to ensuring that activities like data collection and reporting, performance management, program and system monitoring, compliance and regulatory oversight, technical assistance, and specific outreach activities occur.

Vermont's workforce partners consistently and effectively provide their services to Vermont's job-seekers and employers. Despite the individual successes of Vermont's WIOA partner programs, the state faces demographic shifts and ongoing funding constraints that challenge partners in further meeting the more specialized needs of Vermont businesses, employers, employees, and job-seekers with significant barriers to employment.

Major changes have come to Vermont's state college system, a key access point for the workforce education and training system. Changes will come to the State Workforce Development Board and its staff support positions. These changes can potentially increase the capacity of the workforce development system to assess effectiveness and impact the responsiveness of the system. The state is also poised to make significant changes to the funding and governance system for secondary career technical education (CTE), and to the adult basic, secondary, and technical education system.

Core partner data systems are limited in their ability to conduct gap analysis and to present timely performance information to staff and to partners. By making investments in the technological infrastructure and with support from the General Assembly, we will increase the capacity of the system to offer real-time information to job-seekers, employers, and stakeholders.

## B. STATE STRATEGIC VISION AND GOALS

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

### 1. VISION

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

### 2. GOALS

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

(A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment<sup>8</sup> and other populations.<sup>9</sup>

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

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

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

### 3. PERFORMANCE GOALS

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

### 4. ASSESSMENT

Describe how the State will assess the overall effectiveness of the workforce development system in the State in relation to the strategic vision and goals stated above in sections (b)(1),

(2), and (3) and how it will use the results of this assessment, which may include evaluation findings, and other feedback to make continuous or quality improvements.

As noted in section II.a, above, the current demand for labor far exceeds the supply of workers in Vermont, and particularly in certain industries and among occupations with specialized skillsets. The labor shortage that existed prior to the pandemic has become significantly more acute as the economic expansion built over the past three years.

To better understand the available employment opportunities in the state, the Vermont Department of Labor conducted employer based research to understand, from their perspective, which skills were most difficult in the recruiting process. They were: workplace effectiveness and interpersonal skills. This includes showing up on time, following instructions, and working well with others.

Beyond these basic skills and the general labor shortage, employers in the state report specific difficulty filling certain medium- and high-skill positions. The most in-demand skills are those related to basic job performance: critical thinking skills, basic math skills, and reading / verbal language comprehension. More specialized skills in the highest demand are related to medical fields, education, and the trades. The four industries with the most acute need are: Healthcare, construction, education (including early childhood education), and food prep/serving-related occupations.

Because the demand for workers exceeds the supply, the core partners recognize the role that work-based and on-the-job training programs, like registered apprenticeships and internships can plan in helping employers more effectively prepare the workers they are able to attract. The VDOL is the apprenticeship registration agency. Over the course of the term of this plan, will work to support the development and certification of pre-apprenticeship programs that are also registered as integrated education and training (IET) programs under Vermont Agency of Education's Title II programs, and in partnership with the Title IV programs, VDOL will support for the development of pre-apprenticeship programs for individuals with a disability, and will partner with the Title IV programs to ensure employers receive training and support on disability employment.

Vermont's Title I and Title IV programs intend to expand the use of paid on-the-job training programs to train workers, especially in rural areas where access to training programs is limited, or in sectors where no training programs exist.

## **1. Vision**

Vermont's employment demands will be met through a statewide, coordinated, and integrated system of workforce education, training, and development where all Vermonters can connect to robust career pathways, advance along career ladders, and new Vermonters can quickly secure employment with a Vermont employer.

## **2. Goals**

**Goal 1:** (visibility, information) Ensure that people in Vermont have easy access to education, training, and services that support the attainment of their career and financial goals.

**Goal 2:** (historically marginalized, in demand) Ensure that everyone – including women, Veterans, minorities, people with disabilities, and other underrepresented groups - can

contribute and thrive in high-demand careers that will directly impact Vermont's success over the next decade - housing, broadband access, climate resiliency, transportation infrastructure, childcare, education, and healthcare.

**Goal 3:** (youth, education, and training) Increase assistance to Vermonters to encourage high school completion, earn additional qualifications like industry-recognized certificates, participate in registered apprenticeships, or pursue post-secondary degree programs.

**Goal 4:** (improvement and effectiveness) Integrate continuous improvement practices into the operations of the workforce development system, its core partners, and education and training providers so the system can effectively serve as many individuals and businesses as possible.

**Goal 5**(employer): Meet the needs of Vermont's employers by proactively engaging education institutions, youth, young adults, and college students at key transition points to increase their awareness of the many career entry and advancement opportunities around the state.

**Goal 6** (employer): Ensure employers have the tools they need to navigate labor shortages by linking them to on-the-job training programs, technical assistance, information on best practices in job design, hiring, compensation, and emerging expectations that workers have of their workplace.

**Goal 7** (accessibility): Adapt the public workforce system's access points to ensure hyper-local and virtual components are available to meet the needs of job-seekers of every generation and background.

**Goal 8** (data, improvement & effectiveness): Align data collections across the workforce system so that data can be more effectively and efficiently used to inform decisions, identify gaps in service delivery, uncover gaps in training and credentialing, and foster equity and accessibility within the public workforce system and among the core partner programs.

### **3. Performance Goals**

Refer to Appendix A.

### **4. Assessment**

The State will assess the overall effectiveness of the workforce development system in the following ways:

1. The six common performance measures reported by the core partners will indicate how many job-seekers and employers are being served, how well they are being served (short and long-term employment, wages, credential attainment, skill gain, repeat services, etc.), and whether our performance is aligned with our goals this program year and over time.
2. The common data elements collected on program participants and services will indicate whether target populations are experiencing positive impacts as expected, and we will link to new data sources to conduct a longitudinal analysis of effectiveness.
3. The state's localized unemployment, youth (16-24) employment, and labor force participation rates will indicate the effectiveness of the system in serving each county/

region, in re-engaging people who are disengaged, and in increasing the number of youths who are connected to the workforce.

4. The WIOA narrative report and VDOL's Annual Workforce Report will describe outcomes from specific initiatives, progress in supporting historically marginalized populations, staff development, sector-based partnerships, etc.
5. Customer satisfaction surveys administered by each program, focus groups conducted with specific populations, and follow-up calls with participants will reflect whether services meet customers' needs.

The State will use the results of the assessments and other feedback to make continuous and quality improvements, using the regular negotiation of the One-Stop MOU as the mechanism for initiating system-wide changes.

### C. STATE STRATEGY

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

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

2. DESCRIBE THE STRATEGIES THE STATE WILL USE TO ALIGN THE CORE PROGRAMS, ANY COMBINED STATE PLAN PARTNER PROGRAMS INCLUDED IN THIS PLAN, REQUIRED AND OPTIONAL ONE-STOP PARTNER PROGRAMS, AND ANY OTHER RESOURCES AVAILABLE TO THE STATE TO ACHIEVE FULLY INTEGRATED CUSTOMER SERVICES CONSISTENT WITH THE STRATEGIC VISION AND GOALS DESCRIBED ABOVE. ALSO DESCRIBE STRATEGIES TO STRENGTHEN WORKFORCE DEVELOPMENT ACTIVITIES IN REGARD TO WEAKNESSES IDENTIFIED IN SECTION II(A)(2)

Vermont has identified these five cross-cutting strategies that will apply across all goals:

1. **Technology** – strategies in this category are focused on how technology, virtual tools, and data systems will be used to help the state reach the goal and achieve the strategic vision.
2. **Staff Development/Training** – strategies in this category are focused on the needs of core and extended partners to achieve a high level of service delivery to participants, to understand technological changes brought on by technology strategies, and to effectively adapt to change initiatives and respond to continuous improvement efforts.
3. **Public Awareness** – strategies in this category are focused on making the public at large aware of the services offered through the public workforce development system

and will also be used for intentional outreach activities to populations that have not historically been involved in the public workforce system.

4. **System Coordination** – strategies in this category are focused on improving internal awareness of program offerings and mechanics of funding among partners with the intent of predicting more effective coordination among partners and programs.
5. **Direct Impact** – strategies in this category are aimed at directly impacting job-seekers, workers, and employers.

Vermont outlines the following strategies it intends to undertake to achieve the goals and vision of the WIOA state plan for 2024-2028:

#### 1. TECHNOLOGY

- Modernize the state’s public job board and case management system.
- Develop a five-year strategic plan for the implementation of a longitudinal data system that incorporates education and workforce data.
- Develop a training opportunity clearinghouse to collect, publish, and share information describing education, training, and skill development opportunities with the public and related service delivery providers.
- Develop a plan to implement a “virtual one-stop workforce expansion resource center” to provide just-in-time, on-demand services where and when customers want them.
- Collect and review labor market, education and training, and workforce service delivery data by gender, age, race, ethnicity, and disability status.
- Quarterly, analyze data to understand the populations that are being served (and not being served) by the public workforce system, including those with barriers to employment, including displaced homemakers, low-income individuals, minorities, individuals with disabilities, youth, older individuals, ex-offenders, homeless individuals, youth who have aged out of the foster-care system, individuals who are English language learners, individuals with low levels of literacy, farmworkers, single parents, Veterans, long-term unemployed individuals, and new Americans.
- Develop common, easily accessed tools and resources to assist employers in receiving workforce services.

#### 2. TRAINING & DEVELOPMENT

- VDOL will hire a training and development coordinator to support the development of training plans, delivery of training, and to develop a Registered Apprenticeship program for internal staff in the occupation of “workforce development specialist.”
- VDOL staff will receive training and support related to on-the-job (OJT) training contracts, allowing for an increase in their use across the state.
- Staff will receive training at least quarterly related to the needs and expectations of the five primary generations served by the public workforce system and each population



identified in the plan (e.g., immigrants, new Americans, youth, those living in poverty, justice-involved, those experiencing homelessness).

- Develop and coordinate shared professional development opportunities, best practices, and approaches to counseling individuals in entering and advancing along career pathways.
- JVSG staff will complete National Veterans' Training Institute (NVTI) training within 18 months of hire. NVTI provides specialized training and professional skills enhancement for veterans' service providers. Focusing primarily on training individuals who help veterans secure long-term employment, ensuring that those who are tasked with this critical responsibility have the knowledge and tools necessary to perform their jobs effectively.
- Registered Apprenticeship program staff, job center staff, and HireAbility's Career Advancement Project staff will receive ongoing training related to registered apprenticeship.
- Develop and deliver training to secondary school counselors, CTE counselors, and work-based learning coordinators to increase awareness of training and development, and career opportunities in Vermont for their students.
- Develop and deliver training and technical assistance to educational institutions and employers related to child labor laws in the Fair Labor Standards Act, especially in relation to work-based learning and training.
- Provide virtual workshops for partner staff and service providers to facilitate greater alignment and integration of JVSG, TAA, RESEA, SNAP, and TANF programs into the one-stop system.
- Provide training and technical assistance to employers related to changing job-seeker expectations and improve support given to individuals with barriers to employment.

### 3. PUBLIC AWARENESS

- VDOL will hire a workforce communications specialist to plan and implement communication and outreach strategies to increase public awareness of the public workforce system.
- Working with partners, VDOL will develop a common branded "jobs campaign" that will increase the visibility of the public workforce system and its programs and services.
- Make the public aware of education and training opportunities aligned with in-demand occupations in the state.
- Increase outreach and delivery of workforce services to at-risk youth, ex-offenders, women, veterans, minorities, individuals in recovery, new Americans, individuals with disabilities, and mature workers to support their initial, continuing, and extended participation in the labor market.
- Increase access to employment services by providing them in places more convenient to the customer, including in public libraries and through virtual methods.

- Conduct focus groups with diverse groups to develop informed communication strategies.

#### 4. SYSTEM COORDINATION

- The State Workforce Development Board will contract with an entity to assist in improving the operations of the “one-stop system” and its partners.
- Review and comment on all state plans related to Federal investments in Vermont to ensure appropriate coordination with the public workforce development system.
- Develop common intake, communication, and referral processes to increase co-enrollment in and alignment of workforce service and support programs.
- Develop and conduct semi-annual opportunities for communication, service coordination, and cross-training of workforce service delivery providers at the regional and state levels.
- Promote program and community-partner collaboration to develop cohort-specific programs serving at-risk youth.
- Make information about available support services, eligibility information, and referral protocols among workforce service providers more visible and consistently available.
- Ensure coordination and availability of transition support for individuals moving from secondary to post-secondary education and training to enable successful entry into future employment in a career pathway with opportunities for advancement.
- Increase outreach and explore best practices for enhancing and systematizing Rapid Response, Layoff Aversion, and Trade Adjustment Assistance activity.

#### 5. DIRECT IMPACT

- Expand the use of paid work-based learning and training, progressive employment practices, and other on-the-job training models.
- Promote the development of digital literacy training for mature workers who are interested in remaining in or returning to the workforce.
- Promote the coordination of and expansion of publicly available transportation options for working Vermonters.
- Prioritize participant enrollment in education and training programs that result in measurable skill gain and attainment of a high school diploma or post-secondary credential.
- Prioritize sector partnerships that inform the development and expansion of career pathways that align education, training, and recruitment activities in areas of the economy that will directly impact Vermont's success over the next decade - housing, broadband access, climate resiliency, transportation infrastructure, childcare, education, and healthcare.

- Expand strategic partnerships with employers and industry and economic development leaders to develop training programs that meet the employment needs of local businesses.
- Provide relocation information and employment assistance to in- and out-of-state job-seekers to connect them with available jobs.

### 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).

Vermont is a single-area state and has one state-wide workforce development board. The State Workforce Development Board (SWDB) was established by the federal Workforce Innovation and Opportunity Act (Public Law No. 113-128) and Vermont Statute (10 V.S.A. chapter 22A). Its primary role is to provide advice to the Governor and the Commissioner of Labor on the creation and execution of a comprehensive, coordinated, and adaptable workforce education and training system. The Board’s objective is to ensure that the workforce development efforts in the state are aligned with the needs of employers and individuals seeking employment or career advancement opportunities.

As a 60-member majority-business Board, the SWDB is responsible for conducting a continuous statewide public engagement process. The objective of the Board is to gather feedback and information regarding the workforce education and training needs of employers, workers, and job-seekers. In addition to business members, the SWDB consists of government agency and department leaders, state legislators, educators, representatives from Regional Development Corporations (RDCs), and other relevant stakeholders. This diverse composition ensures a comprehensive and inclusive approach to addressing the workforce development challenges and opportunities in the state. The Board contracts the services of a “one-stop” system operator, which helps maintain a firewall between the core programs and the operation and improvement activities of the “one-stop” system.

The full Board meets at least three times per year to discuss and approve strategy and policy, learn about and discuss successful workforce and education training initiatives happening across the state, and collaborate on solutions to address issues within the system. These are all incredibly important tasks for the SWDB to undertake, especially as Vermont’s workforce numbers continue to trend downwards.

In addition to the full Board, the SWDB consists of several standing committees. The committees are sector-based (i.e. manufacturing, health care, etc.) and strategy based (i.e. operating, policy, training and credentialing, career pathways, etc.). Committee membership is comprised of Board members, additional business owners, stakeholders, and community partners. These groups meet regularly to discuss sector demands, needs and best practices, and solutions in their sector or strategy area. Committees provide boots on the ground knowledge and recommendations to the full SWDB.

The General Assembly passed legislation in 2022 to re-examine the size and purpose of the Board. That process was completed in 2023. The General Assembly is expected to take up legislation in 2024 to create a smaller board, aligned more closely with the membership requirements in WIOA.

## 2. IMPLEMENTATION OF STATE STRATEGY

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

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

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

Vermont's workforce development system serves job seekers, workers, and employers more effectively and efficiently as service providers, employers, educators, and community partners operate more as an integrated system. As partners understand and respect one another's areas of expertise and program oversight, they avoid unintentional replication of services and staff time, overcoming the weaknesses of operating on a small scale and expanding their ability to provide more and higher-quality services. As progress is made in unifying and aligning programs, work plans, timetables, and infrastructure, an even stronger workforce development service system emerges.

Over the four-year period, this plan covers, the core partners will meet quarterly to discuss and address gaps that emerge in the system and to help direct resources when appropriate. The one-stop operator will convene partners on a more frequent basis to discuss cases and identify areas where closer collaboration and coordination could and should be taking place. The one-stop operator and the core partners will present outcome data on a quarterly basis to the State Workforce Development Board, which can serve in an advocate role with the General Assembly and to the Governor.

Partners will use WIOA funds, in accordance with WIOA regulations and state policies, at a minimum, in the following ways:

1. Staff salary and benefits for time spent working on WIOA
2. Training for staff development

3. Supportive service payments for eligible individuals
4. On-the-job training expenses (wages paid to participants or reimbursements for wages paid to participants)
5. Outreach activities, especially to the populations with barriers, identified earlier in this plan.

In terms of state-funded activities, the Vermont Department of Labor intends to operate the following programs or funds:

1. Registered Apprenticeship Program
2. Workforce Education and Training Fund
3. Youth Employment Fund
4. Vermont Training Fund

These funds pay for staff salaries and benefits and cover activities and expenses that WIOA funds can't cover. In addition, using a combination of state and eligible federal funds, we will implement a new customer relationship management/workforce information system and begin developing a longitudinal data system across the education and workforce training system.

WIOA, specifically Title III – Wagner-Peyser, creates an expectation that we treat employers in the same way we treat program participants - with the same level of service and customer-oriented focus. The programs provided to employers are meant to strengthen their businesses.

The establishment of a dedicated Business Services Team, comprising VDOL case managers from all regions of Vermont, signals a more structured, comprehensive approach to meeting employer needs. Ongoing training, weekly business outreach targets, regional office support, and a network of staff in each service area are integral components of this strategic effort.

The VDOL Business Services Manager is working with core and community partners to create the first-ever Vermont DOL employer guide. This guide will serve as a reference book for all state-specific services and grant opportunities. This guide will facilitate easier outreach, foster collaboration across state departments, and add value to initial business engagement. It will be offered as a text guidebook and as an electronic resource on the Department's website.

VDOL will develop and publish a comprehensive business services training manual to accelerate the onboarding process for new staff. Collaboration with division members and outside consultants will contribute to the creation of effective outreach methods and regional relationship building. Additionally, to enhance the knowledge base of Business Services staff, ongoing training and collaboration with other state departments will be necessary. Weekly team meetings, guest speakers, training materials, and national opportunities like National Association of State Workforce Agencies (NASWA) conferences will ensure staff proficiency and excellence.

Over the next four years, VDOL's Business Services team is poised to forge new partnerships, particularly with underserved communities such as LGBTQ+, BIPOC, New Americans, and low-income housing centers. Collaborating with the Vermont state housing authorities, refugee &

immigration service organizations, and LGBTQ+ groups, VDOL aims to offer workforce development assistance, expand services, and create safe spaces for job seekers at our job fairs.

The Business Services Team maintains a consistent and thorough vetting process for businesses that are interested in using our job board (Vermont Job Link, or VJL), fostering trusting relationships with the employer community. This approach not only minimizes fraud in VJL but also enhances overall engagement, ensuring sustained effectiveness in serving employers, and peace of mind for job seekers.

Some of the core activities included in business services throughout the State include:

- Work Opportunity Tax Credit
- Federal Bonding
- Worker Adjustment Retraining Notice (WARN)
- Rapid Response
- Incumbent worker training programs
- On-the-job training programs
- Apprenticeship promotion
- Assistance for apprenticeships
- Industry and sector specific strategies
- Leveraging efficient business intermediaries
- Recruiting employers to AJCs
- Connecting job seekers and employers by facilitating relationships
- Providing Information of H2B & H2A Programs

These initiatives are crafted to employers' requirements concerning the economic demands of their specific regions. The goal of workforce development in Vermont is to cultivate a knowledgeable and flexible labor force. This continual enhancement of the state's economy is achieved by synchronizing the needs of businesses with skills training. It falls upon the business service personnel to conduct consistent outreach efforts, which include:

- Conducting face-to-face meetings with employers on their premises or participating in job fairs or other hiring events
- Facilitating employer access to resources funded through grants and tax allocations
- Advising employers on strategies to mitigate high turnover rates among employees
- Providing information on employee training programs aligned with current labor market trends

To establish credibility and trust amongst employers requires a comprehensive understanding of programs offered by the Vermont Department of Labor. When engaging with employers,

business service staff must proficiently articulate how each WIOA program addresses their specific needs.

As we look to implement the use of ITA (Individual Training Accounts) we look forward to collaborating with Federal and state agencies on developing and implementation of effective ITAs. VDOL is seeking technical assistance and training on establishing ITA accounts.

Business intelligence is an important compass for the work of our business services team. VDOL recently acquired licenses to Dunn & Bradstreet's business database, EconoVue. The integration of this state-of-the-art business database in our business services team practices, will revolutionize targeted business outreach and service. T

Business Services staff will continue to foster a relationship with HireAbility (Title IV) and adult education grantees (Title II). We plan on offering their services during rapid response events while working together to facilitate joint events throughout the state.

Providing comprehensive services across the business cycle continues to be the foremost goal for VDOL Business Services staff. The Business Services Manager also serves as the Rapid Response Coordinator, working with companies and their employees during times of downturn or restructuring.

Rapid Response continues to be one of the most important activities for the business service staff. Staff are expected to always be on the lookout for and investigate rumors of potential business closures, layoffs/furloughs, and internal restructuring that could potentially lead to job loss.

The Rapid Response Core Flow is as follows:

- Staff become alerted to potential closure
- Investigation ensues through phone calls, emails, and direct outreach
- Upon confirmation of closure, notify the business service manager
- Business service manager ensures compliance with WARN Act notices and state regulations
- Rapid Response planning begins, and partners are informed
- On the date of Rapid Response, presentations are delivered by UI and VT Health Connect representatives
- Local AJC staff engage with affected individuals for personalized one-on-one service

One area for expansion is the development of one-point notification option for businesses that need to provide WARN or VT State Notice of Potential Layoff notification and need Rapid Response services.

Another area for improvement is the need for development of Layoff Aversion procedures and programming. We are looking forward to engaging with federal and state partners to implement effective strategies.

## 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.

### **Alignment with Activities Outside the Plan**

To effectively implement the strategies above, the coordination and alignment of services must extend beyond the work of the core partners. As a small state, this work is often done informally with pockets of successful collaboration. To achieve the stated aspirational goals of this plan, cross-program, customer-centered planning will need to occur. Job seekers in and out of Vermont will have to be engaged, businesses small and large will need to be supported, and special consideration will need to be placed on supporting those who do not traditionally engage in workforce services.

Attracting new workers to Vermont will continue to be an area of focus in the coming years. The VT Agency of Commerce and Community Development (ACCD) has taken the lead on this work at a high level. Through their ThinkVermont branding and webpage, ACCD provides an easy-to-find starting point for prospective Vermonters. They have established a network of community-based organizations that provide concierge service to anyone interested in relocating to Vermont, offering resources around employment, housing, education, healthcare, and lifestyle.

The Jobs for Veterans State Grant (JVSG) and VDOL staff use several approaches/benefits to help individual Veterans improve their probability of employment in Vermont. We use recruitment, internships, and lodging to encourage the transition to the state (Think Vermont). The VDOL JVSG team partners closely with Think Vermont when doing out-of-state recruitment.

The JVSG staff and workforce development staff attend career fairs at Fort Drum, NY, Fort Liberty, NC, and soon-to-be other locations on the East Coast to get highly skilled transitioning service members to become Vermonters. We focus our search on Specific Military Occupation Specialties (MOS) needed by employers in Vermont. We intend to use MOS at civilian crosswalks to assist us in translating skills learned in the military to the skills Vermont's employers desire. Our military recruitment efforts include specific messages to different interests and backgrounds – we search for people with a former attachment to Vermont (e.g., grew up here, visited grandparents here), non-Vermonters who enjoy the recreational lifestyle of the state, or Northeast living service members who understand the demands of winter living. The JVSG staff encourages these individuals with the Department of Defense program "SkillBridge."

"SkillBridge" provides every service member full military pay and allowances for the length of the internship with no monetary or health requirements for the business. The length of the internship is up to but not to exceed 120 days of complete company immersion, resulting in a complete understanding of the employment demands and expectations for future employment. Employment with the internship organization is not a requirement but is encouraged.

Before the Veteran fulfills the internship, another program we like to pair services with is "Hilton Honors." They will provide service members and spouses three nights of free lodging to



help with any job-related activities in Vermont or 30 other participating states. This will provide an opportunity for the service member to garner permanent housing before the start of the internship.

The Vermont Job for Veterans' State Grant Incentive Award Program elects to use 1% of the Jobs for Veterans State Grant (JVSG) allocation to provide performance awards for eligible employees and local One-Stop offices. The awards program is intended to encourage and incentivize the improvement and modernization of employment, training, and placement services for Veterans while also recognizing employees and offices for excellence in providing these services or for efforts to make demonstrable improvements in providing services to Veterans.

Vermont designates 1% of the FY JVSG Grant for performance incentives: an LVER Performance Award of \$1,000.00, a DVOP Performance Award of \$1,000.00, and a One-Stop Staff/Partner Award of \$1,000.00. Vermont also encourages a success award of approximately \$1,200 to the 1st Place local office and approximately \$720.00 to the 2nd Place local office.

Nominations must detail the activities that meet achieved one of more of the following goals:

1. System improvements that result in improved services to Veterans and other eligible individuals served by the JVSG program.
2. Outstanding case management on behalf of a JVSG participant.
3. Exceptional effort expended to assist homeless, formerly incarcerated, or other Veterans with barriers to employment.
4. Activities that led to improved performance, reduced time or cost, or promoted better collaborations to support Veterans.
5. Outstanding outreach or placement efforts on behalf of Veterans and/or JVSG participants.
6. Extraordinary community relations efforts to increase awareness of Veterans' issues.
7. Development of a program for which the impact may not be directly measurable (e.g., resume skills building program) targeted to support Veterans.

As the State Apprenticeship Agency, the Vermont Department of Labor will continue to support significant efforts around the expansion of Registered Apprenticeship. VDOL is focused on building its internal team, identifying and growing relationships with current apprenticeship partners, and adding new intermediary relationships to expand employer participation and apprentices. After successfully transitioning the outdated manual apprenticeship tracking system to the federal RAPIDS system, VDOL has seen significant improvement in program management and accountability. There is also now a reliable data source available for reporting and planning.

Some industry sectors currently receiving focus and funding are telecommunications, construction, education, and manufacturing. VDOL has provided state and federal funds to strategic partners in these industries to support continued expansion.

Additionally, VDOL plans to further define and operationalize both Youth Apprenticeship and Pre-Apprenticeship in Vermont. Both exist in pockets around the state but have not been fully codified. The goal for the current program year is to formalize these programs, develop a marketing plan, and grow additional programs in partnership with the Agency of Education and other community partners. This will create clear pathway options for individuals at key transition points, including in-school youth. The State Workforce Development Board and the Vermont Department of Labor intend to be involved in planning and designing the primary workforce development programs funded with federal investments over the next four years.

### 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 State Workforce Development Board, the core partners (Vermont Department of Labor, Agency of Education, and the Department for Aging and Independent Living), and key stakeholders are committed to aligning and coordinating our service delivery models. Each entity is dedicated to ensuring the provision of high-quality services to individuals seeking workforce support.

While each program operates with its own structure, programs actively partner, sharing processes, resources, and ideas for improvement. This cooperative approach aims to identify and support individuals in overcoming barriers, intertwining resources, sharing career pathway exploration, and facilitating educational opportunities. A continuous reevaluation of the customer experience within the One-Stop Center operation is a shared priority.

In 2024, the State Workforce Development Board plans to finalize a contract with a One-Stop Operator, marking a shift from VDOL's previous roles of overseeing and administering all One-Stop operations. This change anticipates ongoing feedback, education, training, coaching, to enhance relationship development and align expectations among all core partners.

Looking ahead, all contributing partners commit to embracing the aspirational goals outlined in this document. Success is contingent upon synchronized efforts in policy, outreach, service delivery, joint case management, and performance.

Given Vermont's current economic status and low unemployment rate, stakeholders focus on communicating the importance of supporting the most underserved populations with education and training opportunities. Conversations with Vermont employers now center on offering opportunities to individuals with limited work history, criminal backgrounds, immigrants, disabilities, older workers, and youth. Policy reform and performance visions will drive the operationalization of this vision.

VDOL's Workforce Development Division will be restructured to support the strategies of this state plan – including focusing on workforce expansion, business services, program administration, data analysis and improvement, outreach, and organizational development and

training. With job-seekers, employers, and partners as primary customers, aligning staff positions will enhance our ability to meet their diverse needs effectively.

VDOL plans to continue in its role as a partner in the Individual Career Advancement Network (ICAN) which is the employment and training component of the State's Temporary Assistance for Needy Families (TANF) and Supplemental Nutrition Assistance Program (SNAP) administered by the Agency of Human Service's Department for Children and Families. The ICAN program. VDOL staff provide employment and training supports to eligible Vermonters, and the ICAN program uses Vermont Job Link to enroll and track participants' progress.

VDOL is the registration agency for Registered Apprenticeship programs. VDOL will continue to work with Title II partners to support the design and certification of pre-apprenticeship/integrated education and training (IET) programs, and will continue to work with Title IV partners (HireAbility and the Division for the Blind and Visually Impaired) to support the design and certification of pre-apprenticeship programs for individuals with disabilities, and the work with Title IV will involve providing supported services to eligible individuals who are hired as apprentices in registered programs.

The Registered Apprenticeship program will also be supporting the design and certification of youth apprenticeship programs in Vermont's regional CTE centers programs that are closely aligned with existing registered apprenticeship programs. The Department of Labor will continue to pursue leveraging Adult CTE programs in the related instruction component of Registered Apprenticeship programs.

Working in partnership with the WIOA programs, the Registered Apprenticeship Program offer guidance and technical assistance to program sponsors related to the Eligible Training Provider List (ETPL), with a goal of increasing the number of program sponsors who opt to be listed on the ETPL so that WIOA funds for youth and adults can be used in support of participants in registered apprenticeship programs.

Individuals with disabilities are much less likely than their peers without disabilities to enter and/or complete post-secondary education programs. Post-secondary education and credentialed training programs are essential for most participants to access high wage employment. Therefore, HireAbility (Title IV) will implement strategies to increase participation in these programs across all participants served. Creating an array of options, including "earn and learn" options such as apprenticeship, pre-apprenticeship programs, and paid work experiences will provide onramps for participants to engage in education and training programs that fit their needs.

In the realm of outreach and training, VDOL aims to dispel the misconception of being solely the "unemployment office." By adopting a broader strategic approach, silos will be dismantled, fostering collaboration and mutual support. Strategic efforts include sharing, training, and promoting combined services via outreach to educate Vermonters. The Job Fest series organized by VDOL WFD exemplifies this approach, bringing employers and partners together in various locations throughout the state during spring and fall. These events not only support employers and job-seekers but also initiate conversations on barriers faced by job-seekers, such as transportation, and allows for future brainstorm sessions discussing possible solutions like ride- share and designated drop-off/pick-up.

#### 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.

##### **Coordination, Alignment, and Provision of Services to Employers**

The VDOL envisions a dynamic and innovative approach to address the challenges of an evolving workforce landscape. With a steadfast commitment to employers, VDOL anticipates taking innovative steps to support recruitment, training, and retention needs. Vermont's business community remains resilient and resourceful despite a tight labor market, high inflation, and other adverse conditions following the pandemic and recent catastrophic flooding in the state.

Looking ahead to 2024 and beyond, VDOL's Business Services team is poised to forge new partnerships, particularly with underserved communities such as LGBTQ+, BIPOC, New Americans, and low-income housing centers. Collaborating with the Vermont state housing authorities, Refugee & Immigration organizations, and LGBTQ+ groups, VDOL aims to offer workforce development assistance, expand services, and create safe spaces for job fairs.

Establishing a dedicated Business Services Team, comprising individuals from all regions of Vermont signals a more structured approach to comprehensively meeting employer needs. This strategic effort includes continuous training, weekly business outreach targets, regional office support, and a network of employees in each service area.

Integrating EconoVue, a state-of-the-art business database, will revolutionize targeted business outreach and service. VDOL plans to organize a statewide Veterans job fair, support financially challenged companies, provide employment services to growing businesses, and collaborate with other state programs using the tool.

The VDOL Business Services Manager is working with core and community partners to create the first-ever Vermont DOL employer guide. This guide will be a reference book for all state-specific services and grant opportunities. This guide will facilitate more accessible outreach, foster collaboration across state departments, and add value to initial business engagement. It will be offered as a text guidebook and an electronic resource on the Department's website.

VDOL will develop and publish a comprehensive business services training manual to accelerate the onboarding process for new staff. Collaboration with division members and outside consultants will contribute to creating effective outreach methods and regional relationship building. Additionally, ongoing training and collaboration with other state departments will be necessary to enhance the knowledge base of Business Services staff. Weekly team meetings, guest speakers, training materials, and national opportunities like National Association of State Workforce Agencies (NASWA) conferences will ensure staff proficiency and excellence.

Business Services staff will continue to foster a relationship with HireAbility and adult education grantees. We plan on offering their services during rapid response events while working together to facilitate joint events throughout the state.

Providing comprehensive services across the business cycle continues to be the foremost goal for VDOL Business Services staff. The Business Services Manager also serves as the Rapid Response Coordinator, working with companies and their employees during times of downturn or restructuring. One area for expansion is developing a one-point notification option for businesses that need to provide WARN or VT State Notice of Potential Layoff notification and need Rapid Response services.

VDOL has implemented a consistent and thorough process in pursuing effective employer vetting, fostering trusting relationships with the employer community. This forward-looking approach minimizes fraud in Vermont JobLink and enhances overall engagement, ensuring sustained effectiveness in serving employers. The future of VDOL is one of innovation, collaboration, and proactive strategies to meet the evolving needs of Vermont's workforce.

One valuable workforce tool to support businesses that VDOL is strongly emphasizing is the Work Opportunity Tax Credit (WOTC). This program is a federal tax credit program designed to encourage employers to hire individuals from specific populations and support programs who historically have faced significant barriers to employment. The key benefits of the WOTC program for employers include:

1. **Tax Credits for Hiring Eligible Workers:** Employers can receive tax credits based on a percentage of the qualified wages paid to employees from specific target groups. The credit amount varies, ranging from \$2,400 to \$9,600 per employee, depending on the target group and the number of hours the employee works.
2. **Incentives for Hiring Individuals with Barriers to Employment:** The program is intended to incentivize employers to hire individuals facing challenges in securing employment, such as veterans, ex-felons, individuals receiving Supplemental Nutrition Assistance Program (SNAP) and/or Temporary Assistance for Needy Families (TANF) benefits, long-term unemployed individuals, and others.
3. **Reduced Hiring Costs:** The tax credits provided through WOTC can help offset the costs associated with hiring and training employees from target groups. This can be especially beneficial for employers committed to diversity and inclusion.
4. **Business Tax Incentives:** WOTC directly reduces an employer's federal income tax liability, making it a valuable incentive for businesses looking to minimize their tax burden.
5. **Increased Workforce Diversity:** By participating in the WOTC program, employers contribute to a more diverse and inclusive workforce, as the program targets individuals who may face barriers to employment due to various factors.
6. **Program Support and Administration:** State workforce agencies are crucial in facilitating the WOTC program. They provide information, outreach, and assistance to employers in navigating the program requirements, completing necessary forms, and ensuring compliance.

Vermont operates under a completely manual process to receive applications, review for completeness, determine if eligibility requirements are met, and communicate determinations to employers. Over the next two calendar years (2024-2025), Vermont will invest in the modernization of the program's administration, including both the business processes and

underlying technology used to support the program. The first step in this modernization is to procure and implement a new online portal to manage application submissions, communicate determinations, and provide improved reporting capabilities. Once the portal implementation is complete, we can identify opportunities for continued process improvements via collaboration with our partner agencies. This collaboration will focus on improving the efficiency and effectiveness of how the program is administered through data sharing and potential data integration with our partner's source data systems.

Adult Education and Literacy providers will continue to conduct outreach to employers to offer information and support regarding services available to employers and employees through the one-stop delivery system. AEL providers also provide employees access to education and training that may include skill development, such as English language skills, math, or reading comprehension.

HireAbility Vermont's dual-customer approach considers individuals with disabilities and the business community as key program customers. To that end, HireAbility 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 comprising the various employment programs serving Vermonters with disabilities. Employment teams are designed to improve collaboration between programs and streamline employer outreach to maximize resources and increase opportunities for candidates served by HireAbility. In addition to the Business Account Managers, HireAbility has contracted 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.

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

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

#### **Partner Engagement with Educational Institutions and other Education and Training Providers**

The State's strategies align with WIOA Section 102(b)(2)(B)(iv) to engage community colleges and technical education schools in the workforce development system. Community College of Vermont (CCV) and Vermont State University (VSU) actively participate in the One-Stop system and the activities of the Vermont Registered Apprenticeship program.

Vermont's strategies for engaging education and training providers in the workforce development system are crafted with a keen awareness of the state's small population, which

inherently limits the number of providers not already integrated into the one-stop system. Beyond the existing network, potential partners encompass private colleges or universities, specialized entities providing training like commercial driver's license (CDL) instruction, and select industry-specific programs. Acknowledging the unique challenges Vermont's demographics pose, the state is committed to inclusivity, working to involve and consider these providers in the broader workforce development framework.

To bridge potential gaps in training opportunities and enhance the Eligible Training Provider List (ETPL), VDOL is undertaking a comprehensive gap analysis. This evaluation aims to identify areas where the current offerings are not available that align with occupational projections or where the rural nature of the state requires an innovative solution, enabling the state to strategically target outreach and inclusion efforts.

Technology plays a pivotal role in fostering collaboration and inclusivity. VDOL will invest in technology infrastructure that will make information about training and education more available to the public and, behind the scenes, will help with reporting and measuring the outcomes and value of the programs we operate. Technology investments will also assist in timely communication and effective collaboration among education and training providers and the state's workforce development programs. These investments simplify the application process for education and training providers to be on the ETPL, leading to a more comprehensive clearinghouse of training opportunities by making the ETP process and required reporting more intuitive for potential partners. The State will continue to operate state-funded programs for individuals wishing to pursue education and training opportunities not on the Eligible Training Provider List.

The abovementioned efforts underscore Vermont's commitment to creating a job-driven education and training system through strategic partnerships, data-driven decision-making, and continuous improvement initiatives.

Staff training is a critical component of Vermont's strategy to ensure that workforce development professionals are well-equipped to engage with diverse education and training providers. By providing ongoing training opportunities, VDOL aims to enhance the capacity of staff to effectively communicate the benefits of participation in the workforce development system to potential partners.

Support for new Americans and rural areas is integral to Vermont's inclusive approach. The state recognizes the unique needs of these populations and is committed to providing targeted resources and support to ensure their meaningful participation in the workforce development system. This includes culturally sensitive outreach, language support, and tailored initiatives to address the challenges new Americans and those in rural areas face.

In addition to federal resources, core partners work with the Vermont Student Assistance Corporation (VSAC) to administer state-funded programs. VSAC also administers some eligibility processes for philanthropic programs for workforce education and training. This collaboration facilitates access to grants, loans, scholarships, career and education planning, and comprehensive information for individuals seeking educational opportunities within Vermont.

VDOL is committed to keeping and growing existing resources, including grants from VSAC and state-funded programs like the Vermont Training Program and youth employment initiatives. By strengthening these resources, Vermont seeks to create a robust education system that

meets its residents' diverse needs and goals. VDOL also works closely with the Agency of Education's Career Pathway Coordinators for high school students. This partnership ensures that educational paths align well, making it easier for students to transition from high school to workforce development programs.

#### F. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

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

##### **Improving Access to Postsecondary Credentials**

Vermont is dedicated to improving access to postsecondary credentials, including Registered Apprenticeship completion certificates. The state continues to offer flexible pathways for secondary students, anchored by fostering a personalized learning approach and identifying workforce opportunities and educational pathways related to a student's postsecondary goals. The state aims to share labor market and career pathway information with middle and high school educators, enhancing students' understanding of the credentials needed for specific jobs. The state (VDOL) also aims to expand the use of work-based learning and training programs, and by extension, it will be necessary for the Department to ensure the work-based learning programs are compliant with labor law by providing, at a minimum, training and technical assistance to educators and program coordinators.

Over the next four years, the state will implement Act 55 of 2023, which completely amended existing statute and overhauled the state's Registered Apprenticeship System. The revamped system includes two new programmatic on-ramps to apprenticeship: youth apprenticeship (21 V.S.A. § 1123) and pre-apprenticeship (21 V.S.A. § 1124). Support for popular programs like electrical and plumbing apprenticeships, emphasizing stackable licenses, reflects Vermont's commitment to accessibility and options for all Vermonters.

Vermont's dual enrollment system continues to allow high school students to take two college credit courses, offering a head start on postsecondary pursuits. Recent initiatives include expanded funding for early college programs, enabling high school seniors to enroll in select state colleges during their senior year and pursue apprenticeship opportunities. The Department's Registered Apprenticeship (RA) program will continue implementing Act 55 by providing training and support to employers and educators to help them effectively grant CTE and other students "advanced standing" in RA programs. Advanced standing, like dual enrollment, allows a student to earn credit toward completing an RA program while they are still in high school.

In the 2019 legislative session, the state set a goal for 70% of working-age Vermonters to hold a valuable credential by 2025. The state continues to promote awareness of career pathways, expand access to postsecondary education, and maximize partnerships to achieve workforce and education goals. Core partners collaborate to define, develop, and promote training opportunities that lead to credentials.

Over the four years of this plan, VDOL intends to more effectively use technology to support a "clearinghouse" for information on credentials and training providers, including the impact of



those credentials on earnings over time. This clearinghouse approach expands the information available on the Eligible Training Provider List and will help jobseekers, employers, and education and training providers assess the return on investment (time and money) in specific training and credentialing programs. This approach will assist policymakers and program development professionals in identifying gaps in the training system – both geographically and specific to skills required by employers.

In the dynamic landscape of the digital era, leveraging technology is pivotal for creating an accessible and streamlined system. Moving forward, the Department envisions an enhanced digital infrastructure that centralizes information and facilitates seamless interactions for individuals navigating the educational and credentialing landscape.

Recognizing different generations' diverse needs and preferences, specific and intentional outreach and communication strategies become essential. Collaboration with educational institutions, community organizations, and local influencers could amplify the reach of these initiatives. Additionally, creating tailored content that resonates with each demographic, spanning four generations and addressing concerns and aspirations unique to their age group, can significantly enhance the effectiveness of outreach efforts. Acknowledging each generation's preferences, skills, and abilities can also inform the design and delivery of training programs around the state.

As Vermont endeavors to enhance access to postsecondary credentials and foster workforce success, the strategic incorporation of technology, specific and intentional outreach, staff training, and community engagement emerges as a comprehensive and forward-thinking approach. In terms of access for individuals with disabilities, HireAbility recognizes these individuals are much less likely than their peers without disabilities to enter and/or complete postsecondary education programs. Postsecondary education and credentialed training programs are essential for most participants to access high-wage employment. Therefore, HireAbility needs to implement strategies to increase participation in these programs for all participants. Creating an array of options, including "earn while you learn" options such as apprenticeship, pre-apprenticeship programs, and paid work experiences, will provide onramps for participants to engage in education and training programs that fit their needs. Short-term credentialed programs, such as LNA, are often the starting point of high-wage career ladders.

Additionally, HireAbility might need to be flexible about what counts as a credential. Some credentials, such as ServSafe, do not count as a credential under the Common Performance Measures but will provide participants with marketable skills. HireAbility might also need to provide assistive technology, tutoring, and other strategies to help participants succeed in postsecondary programs. Increasing these postsecondary options and providing the appropriate support will assist participants in achieving long-term career success in quality employment.

#### G. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES

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

#### **Coordinating with Economic Development Strategies**

At the State level, the Agency of Commerce and Community Development (ACCD) is represented on the State Workforce Development Board through the membership and participation of the Secretary of ACCD and the Commissioner of Economic Development. Key VDOL staff, including the Business Services Manager, meet regularly with the economic development team and schedule joint business meetings and visits when appropriate. Around the state, economic development activity is carried out by a network of Regional Development Corporations (RDC). VDOL works closely with those teams during times of expansion and contraction to ensure all resources are made available, including lay-off aversion and Rapid Response services.

To further support workforce expansion, the state of Vermont has invested in a dedicated team of Workforce Expansion Specialists. This will provide a statewide coordinator and three regional positions that will be focused on convening stakeholders around workforce expansion. Similar to the local workforce boards of the past, these individuals will work with economic development, industry, education, and community partners to identify gaps and program resources to align with and carry out the workforce strategies outlined by the State Workforce Development Board.

Moving forward, both ACCD and VDOL anticipate their collaboration will be strengthened by using data to drive service delivery. The leadership of both entities invested in subscriptions to EconoVue to increase business engagement using workforce data and analytics.

Continued collaboration would be enhanced by a shared CRM. With the modernization of systems happening in both organizations, the goal would be to provide some level of integration to increase communication and efficiency of service delivery.

## B. STATE OPERATING SYSTEMS AND POLICIES

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

### 1. THE STATE OPERATING SYSTEMS THAT WILL SUPPORT COORDINATED IMPLEMENTATION OF STATE STRATEGIES (E.G., LABOR MARKET INFORMATION SYSTEMS, DATA SYSTEMS, COMMUNICATION SYSTEMS, CASE MANAGEMENT SYSTEMS, JOB BANKS, ETC.).

The VDOL, the Agency of Education (AOE), HireAbility, and the Division for the Blind and Visually Impaired each use different operating and data systems for their respective programs. These systems cannot exchange real-time data. However, while not automated, data-sharing MOUs that address co-enrollment, case-related data collection, and reporting on employer satisfaction measures have been developed. When VDOL modernizes its workforce development case management system, we will revisit the goal of automating the data-sharing processes. The long-term goal is to create a state-wide longitudinal data system across education and the workforce. The system will facilitate interconnection and alignment between the data systems involved in case management, job banks, performance reporting, and labor market information, among others, to share the information in real-time.

The VDOL's Economic and Labor Market Information (LMI) Division provides labor market information through various 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](http://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, particularly regarding new labor market information data products.

Labor Exchange System. Both labor exchange and workforce development programs are managed using VJL as a case management system. VJL is 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 allows the user to conduct job searches and receive referrals to open positions. Program participants, including UI, WIOA, Wagner-Peyser, TAA, RESEA, and ICAN, must register on VJL 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 RESEA. VDOL's Apprenticeship program uses the federal Registered Apprentice Partner Information Data System (RAPIDS). VJL will be used more extensively in the next year to manage Registered Apprenticeship data, the Eligible Training Provider List, and ICAN (SNAP E & T). We expect to implement a new system to manage Work Opportunity Tax Credit applications in the first year of this plan.

The Agency of Education (AOE) tracks Adult Education and Literacy participants' skill gains and secondary school graduation rates through a web-based, relational database. The database houses each AEL participant's engagement in postsecondary education and employment outcomes obtained through data matches with service provider partners. The AOE also tracks adult education and literacy provider training and activities using the database. AEL providers are responsible for real-time data entry and are able to pull a range of reports to support program monitoring and improvement efforts. The database is aligned with the National Reporting System of the U.S. Department of Education reporting parameters 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, the AOE maintains distribution lists of principals, superintendents, and other key stakeholders.

HireAbility and DBVI track all consumer services through the Aware case tracking system. This system collects demographic, service, expenditure, and participant-level data. The system is used for all required federal reporting for the HireAbility and DBVI programs. The DVR Program Evaluation Unit manages the system. This Unit matches data to other administrative data sources, such as the State Unemployment Insurance Wage Reporting System and the SWIS, to report and evaluate services across programs.

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.

## **Operating System Coordination**

State operating systems that support coordinated implementation of State strategies (for example, labor market information systems, data systems, communication systems, case management systems, job banks, etc.).

VDOL's Economic and Labor Market Information (LMI) Division provides labor market information through various approaches. VDOL staff are available to provide labor market information presentations, workshops, takeaways, and other services to the SWDB, one-stop centers, core partners, one-stop partners, community partners, and employers. Labor market information is available online at [www.vtlni.info](http://www.vtlni.info). This website is Vermont's online resource for labor market information, as supported by the Bureau of Labor Statistics (BLS). 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 members of Vermont's Economic and Labor Market Information Division data listserv, circulating news and other updates about new LMI products.

Vermont's free job bank for employers and job-seekers and VDOL's workforce development programs are managed using Vermont JobLink (VJL). VJL is an online platform that serves as a clearinghouse for available training opportunities administered by providers on the Eligible Training Provider List (ETPL). VJL also houses the client tracking database, case management support, and federal reporting services. Program participants in UI, WIOA, Wagner-Peyser, TAA, RESEA, TANF, and ICAN must register on VJL to receive services. VDOL's Apprenticeship program uses RAPIDS. VDOL plans to connect RAPIDS to VJL; the vendor is currently working with US DOL to set up an interface. This will allow VDOL to import sponsor information to be included on the ETPL.

VDOL works to continually improve the user's experience on the state's job board and case management system. New systems and features will cover major changes to job-seeker, employer, staff, and training provider interactions. We have been engaging with our WIOA core partners and other partners to gather insight into how system changes will work best for their programs. These discussions are crucial in system design improvements and are expected to continue through the program year 2025.

Adult Education and Literacy providers enter data directly into the web-based data system known as LACES. AEL providers must keep the data current at least every two weeks. Data includes student demographics, services provided, barriers to employment, and career services. LACES is programmed to produce National Reporting System reports and is also the source for data sharing with core partners.

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

Vermont's One-Stop MOU includes policies that all One-Stop partners have agreed upon to support the implementation of the State's strategies. These policies include:

## **American Job Center (AJC) Locations**

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." Affiliate One-Stop AJCs are in St. Albans, St. Johnsbury, Barre, Rutland, Bennington, and Brattleboro. Other locations where One-Stop services are delivered throughout the state are at satellite locations and within partner organizations.

## **Common Identifier for Branding**

The required parties agree to use the federally designated branding protocols, either through 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. Along with the unifying effects of common branding, this practice allows every partner to answer questions about the AJC Network, inform customers about available resources, and potentially connect them with appropriate services.

The Department of Labor intends to pursue a common branded "jobs campaign" specific to Vermont and partners of the workforce development system that will further unify the public's understanding of the system.

## **Career Services Coordination and Delivery**

The following programs will offer services in the Burlington AJC and throughout the One-Stop Network, subject to change upon expiration and re-negotiation of the MOU:

1. WIOA Adult Program
2. WIOA Youth Program
3. WIOA Dislocated Worker Program
4. Wagner-Peyser Employment Services Program
5. Trade Adjustment Assistance Program
6. Vermont Registered Apprenticeship Program
7. State Unemployment Insurance Program
8. Reemployment Services and Eligibility Assessments (RESEA) Program
9. Jobs for Veterans Program
10. Vocational Rehabilitation Program, Blind and Visually Impaired Services Program
11. Senior Community Service Employment Program
12. Training and Employment Support Programs offered through Vermont's community action agencies
13. Migrant Seasonal Farmworker Program
14. YouthBuild Program
15. JobCorp Program

16. Adult Education and Literacy Programs
17. Employment and Training Support Programs offered by the Vermont Department of Corrections
18. Employment and Training Services for the Temporary Assistance for Needy Families Program (a.k.a. Reach-UP)
19. Vermont Technical College Employment and Training Outreach Programs
20. Community College of Vermont Employment and Training Outreach Programs
21. Vermont Student Assistance Corporation Employment and Training Outreach and Support Programs
22. WIOA Native American Training and Employment Support Programs, and
23. Employment and Training Services for the Supplemental Nutrition Assistance Program (a.k.a. ICAN)

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 III, and workforce and labor market information will be available in person or through virtual connections at the Burlington AJC.

At least one Title I staff person will be available during regular business hours, either on-site or remotely, and customers will have access to all programs, services, and activities described in this section. For 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.

Parties agree to provide applicable career services through walk-in appointments, scheduled one-on-one appointments, group orientations, and self-service resources. Appointments and orientations will be made available online or via phone when in-person contact is not possible. Where appropriate, partners who provide the same career services agree to deliver those services coordinated and will involve the One-Stop Operator in the process design if needed. The contract for a One-Stop Operator for 2024-2028 is still under negotiation. However, a vendor has been selected. The duties of the One-Stop Operator will be described in the final contract. Still, generally, including but not limited to the activities outlined immediately below, the Operator is responsible for coordinating the partners' activities in the network and assisting the Board in improving the operations and impact of Vermont’s public workforce development system.

#### One-Stop Partner Events Calendar

A calendar of events, workshops, or other public service offerings will include in-person and online events and will be maintained by the One-Stop Operator.

### Common Training to Align Services

Partners will engage in joint training efforts to share best practices and increase skills and professional knowledge in each program to provide effective services and referrals.

### Quarterly Meetings

The partners will meet quarterly to give input on key topics, suggest improvements, share recent needs and program developments, and recommend resource-sharing opportunities.

### Leveraging Physical Space

The comprehensive One-Stop facility is available for any AJC partner to host in-person meetings, serve customers, and work on-site as space availability allows. The role of coordinating a calendar that tracks the availability of conference space will be the responsibility of the Vermont Department of Labor.

### **Business Practices**

Partners will follow their Agency's or program's business practices in providing services under the MOU. These practices include, but are not limited to, auditing, employee personnel practices, employee and client confidentiality, insurance, procurement, record keeping and retention, and employee and client confidentiality.

### **AJC Program Registry**

A comprehensive registry of information on all active programs within the AJC Network. This registry will include information about current programs.

### **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.

### **Co-enrollment Protocols**

Many customers receive more than one service within the American Job Center Network, and thus "co-enroll" in multiple programs. Co-enrollment protocols that support the effective exchange of information while still respecting client confidentiality may be developed by the One-Stop Operator or by individual program partners.

### **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.

### **Accessibility**

Activities, employment, information, and services available to job-seekers and employers through the Vermont AJC Network 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 promote ongoing trainings and share information so that program staff are trained 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 consider 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 the main road. The required number of 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 the laws and regulations referenced above.



Workspaces and Assistive Technology. All public workspaces will be physically accessible to all customers and include assistive technology for customer use.

Hours of Operation. The Burlington AJC provides maximum access to partner program services during regular business hours. Partner staff will consider participants' unique work, childcare, or transportation needs 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 can 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 those 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 the center provides.

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 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.

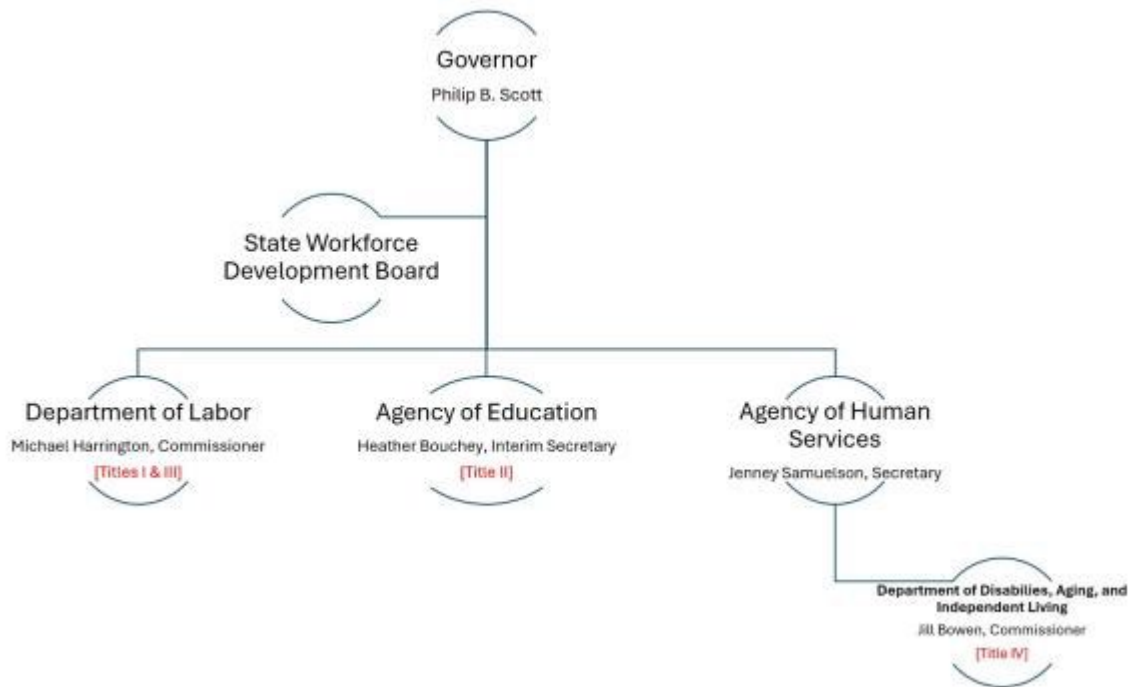
Virtual Accessibility. Customers will have access to all partner program services in the Burlington AJC onsite or via technology located at the center in compliance with WIOA's "direct linkage" requirement, further described in 20 CFR 678.305. Phone, real-time web-based communications, or other technology 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 the dissemination of correct information. Partners will either have their own web presence 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 ensure that their websites are fully accessible for customers utilizing assistive technology tools (compatible with screen reading software, etc.).

### 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.



#### **Vermont Department of Labor (VDOL): WIOA Title I, III, TAA, & IVSG**

The Vermont Department of Labor (VDOL) operates independently within the State government and is led by a Commissioner who reports directly to the Governor. VDOL has about 250 employees, with around 150 staff working from the central office situated in Montpelier. The Department is comprised of the following divisions: Unemployment Insurance, Workforce Development, Worker's Compensation & Safety, Labor Market Information, Wage and Hour and Employment Practices, Legal, and Business Office.

VDOL's Business Office supports all federal financial reporting. VDOL's WD Division oversees various One-Stop partner programs, including the WIOA Title I Youth, Adult, Dislocated Worker, and Rapid Response 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 the state Registered Apprenticeship Program. Other divisions support RESEA, RETAIN, and Vermont's Unemployment Insurance programs.

In addition to maintaining a central office in Montpelier, VDOL also operates 11 regional offices that provide job-seekers and businesses with recruitment and placement assistance. These One-Stop Career Centers offer workforce development support to Vermonters through regional workforce development staff.

## **Agency of Education (AOE): Title II**

The Agency of Education (AOE) is a stand-alone agency in the State government. It has a Secretary who reports to both the Governor and the State Board of Education. The AOE is authorized to oversee the adult education and literacy system funded with federal and state funds. They give grants or contracts to eligible provider organizations through an open Request for Proposal process, and the funds are distributed based on State statute and rules. The AOE Business Office manages all financial reporting and other financial operations related to funding AEL services.

The AOE provides leadership, support, and oversight to ensure that the Vermont public education system helps all students succeed, including adult learners. The Agency's vision is that every learner in Vermont finishes their public education with the knowledge and skills needed for success in college, postsecondary education and training, careers, and citizenship.

## **Division for Vocational Rehabilitation (DVR/HireAbility) and Division for the Blind and Visually Impaired (DBVI): Title IV**

HireAbility and DBVI are part of the Department of Disabilities, Aging, and Independent Living (DAIL), which falls under the Agency of Human Services (AHS). The DAIL Business Office handles the financial operations for both divisions and oversees all federal finance reporting. DAIL also gives general operational support to the divisions, including IT help and legal services.

HireAbility, with a central office and twelve statewide offices, is led by the HireAbility Director. Six regional managers each oversee two district offices and report to the director. Seventy VR counselors operate within the 12 district offices. The central office of DVR houses programs, operational managers, and support staff. Based in the HireAbility main office, the Program Evaluation Unit is responsible for all reporting related to HireAbility and DBVI.

DBVI has a central office and four district offices. The DBVI Director supervises four VR counselors and four rehabilitation associates in the four district offices.

There are many other partners in Vermont's public workforce system at the state and local levels, consisting of various programs and services that aid Vermonters in accessing education and training. Vermont's core partners intend to continue collaborating with these partners to ensure Vermonters can access all education and training services available throughout the state, including opportunities outside the state when appropriate.

### **B. STATE BOARD**

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

The SWDB was established by the federal Workforce Innovation and Opportunity Act, Public Law No. 113-128, and Vermont Statute, 10 V.S.A. chapter 22A. The Board is charged with advising the Governor and the Commissioner of Labor on the development and implementation of a comprehensive, coordinated, and responsive workforce education and training system.

As a majority business member board, it conducts an ongoing, statewide public engagement process to gather feedback and information about the workforce education and training needs of employers, workers, and job-seekers. In addition to business members, the SWDB comprises government agency leaders, state legislators, educators, RDC representatives, and more. The SWDB consists of several committees.

The SWDB meets at least three times per year as a full Board. Given its size, there are multiple standing committees that are sector-based (i.e., manufacturing, health care, etc.), strategy-based (i.e., training and credentialing, career pathways, etc.), and operations-based (i.e., operating, policy). These groups meet regularly to discuss sector demands, needs, best practices, and solutions in their sector or strategy area. Committees provide boots-on-the-ground knowledge and recommendations to the full SWDB.

Act 183 of the 2022 Vermont legislative session created an oversight committee to examine the existing workforce governance structure and recommend relevant changes to increase coordination and alignment among both public and private workforce partners. The Committee is prepared to present recommendations during the 2023 legislative session to narrow the size of the SWDB, which was expanded beyond federal requirements in state statute. This will enable the Board to be nimbler and more responsive to the system's needs.

The Operating Committee is primarily responsible for conducting certain activities, as listed below, on behalf of the full SWDB between meeting dates and for addressing urgent and/or time-sensitive business when a regular or special meeting cannot occur in time to meet the deadline. The Operating Committee is required to report all Committee decisions in writing to the full SWDB. Activities in which the Operating Committee may engage on behalf of the SWDB include:

- Participating in meetings and activities that promote the work of the SWDB, such as marketing and advocating for the goals of the SWDB, 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;
- Approving the draw-down of federal funding, if necessary; and
- Addressing urgent and/or time-sensitive business when a regular or special meeting of the full SWDB cannot occur in time to meet the deadline.

### **Agriculture Committee**

The Agriculture Committee seeks to provide solutions to better engage with potential sector employees already located in Vermont. The Committee also seeks to evaluate common barriers to employment. In addition to looking at the current workforce population, the Agriculture Committee must look at Vermont youth and current programming offerings (e.g., UVM 4-H,

work-based learning, etc.) to better engage individuals in the agriculture sector at a young age. These combined efforts will ensure that Vermont's agriculture sector not only has a current vibrant workforce but is built out sustainably. In the long term, the Agriculture Committee will establish and strengthen the sector's pipeline to better engage with Vermont's workforce while providing ongoing resources to sector employers.

### **Career Pathways Committee**

According to 10 V.S.A. § 541a, the SWDB's Career Pathways Committee (CPC) is charged with the review and approval process of state-endorsed career pathways that reflect a shared vision across multiple sectors and agencies for improving employment outcomes, meeting employers' and workers' needs, and leveraging available State and federal funding. Additionally, the CPC must publicize state-endorsed career pathways in coordination with the VDOL, AOE, and other applicable entities. In updating our approval process and developing an effective Career Pathways marketing campaign, more individuals, both young and mature, can access the education and training needed to enter and remain in Vermont's workforce.

### **Health Care Workforce Development Strategic Plan Advisory Group**

In January 2020, the Rural Health Services Task Force established by Act 26 of 2019 submitted a report on ways to improve Vermont's healthcare system. In 2021, a new strategic plan, based on the previous report, was submitted by the Director of Health Care Reform within the Agency of Human Services in consultation with the Health Care Workforce Development Strategic Plan Advisory Group.

The 2021 strategic plan highlights strategies to increase the number of healthcare workers in Vermont while addressing barriers to entry into the healthcare workforce. Per the updated strategic plan, the "Health Care Workforce Development Strategic Plan Advisory Group should serve as an official subcommittee of the State Workforce Development Board. Integrating the Advisory Group in this manner will ensure that the strategic plan implementation is aligned with broader workforce development initiatives." The SWDB began collaborating with the Advisory Group in March of 2022. The group meets regularly and reports annually to the full SWDB on healthcare-related workforce efforts, suggested improvement strategies, and legislative recommendations for continued progress toward meeting Vermont's healthcare workforce needs.

### **Hospitality and Retail Committee**

The hospitality and retail industries have made up over 12% of Vermont's GDP. Generating billions in revenue to Vermont, the businesses in these two sectors are central to the economic prosperity of our state now and for generations to come. The Hospitality and Retail Committee will develop specific net-new worker goals for their industry and recommend legislative action to the full SWDB to consider meeting goals identified in the SWDB's strategic plan (available upon request).

### **Manufacturing Committee**

To address the manufacturing workforce shortage, the SWDB's Manufacturing Committee must assist in the work of the VMEC and VTPM to develop an effective and accessible flow of competency to Vermont's jobs and careers in manufacturing. In addition to these efforts, the Manufacturing Committee must look forward and re-brand manufacturing for future

generations. This will occur through a strategic marketing campaign that promotes trades' work to younger and disengaged generations as an exciting and high-value career opportunity for individuals from diverse backgrounds, disciplines, and experiences. The Manufacturing Committee will evaluate success based on the number of individuals transitioning from awareness of the available opportunities to employment at Vermont manufacturing businesses.

### **Relocation and Recruitment Committee**

Relocation and Recruitment Committee will focus on a two-fold track of relocating and supporting New Americans, including refugees, asylees, and all other immigrants, and supporting new workers from other states. While there are many regional services and statewide efforts occurring, Vermont needs a unified system. The Relocation and Recruitment Committee will serve as the nexus between private and public efforts to relocate new workers and support partners providing services. The goal is to develop a streamlined approach that effectively translates interest in the Vermont brand into recruitment prospecting and permanent relocation to the state.

As part of this work, the Vermont legislature appropriated the SWDB funds to contract with a vendor to assess the New American workforce system in Vermont to identify gaps, available services, and areas of improvement to serve New Americans better. The SWDB is currently seeking proposals through an RFP process.

### **Training and Credentialing Committee**

The Training and Credentialing Committee was created by the SWDB but had not been active since 2019. Since then, this group has not made recommendations on credentials of value or approved any new eligible training providers. In alignment with the Training and Credentialing Working Group recommendations made in 2019, the TCC will officially define "credential of value." Additionally, the group will "oversee and build on the WIOA Eligible Training Provider eligibility and approval process and create tools and systems to assist in the recognition, use, and visibility of credentials of value to support employers, workers, education and training providers, and workforce development partners."

### **Youth Committee**

The Youth Committee will not only serve as an up-to-date resource for ongoing youth career and mentorship programming while acknowledging barriers to youth employment but also fill identifiable programming and resource gaps by hosting youth engagement events. The Youth Committee will follow a parallel track of promoting and increasing access to existing work for youth while identifying barriers and proposing areas where further investment and coordination are necessary to support youth equitably across the state. Most importantly, the Youth Committee will look to be inclusive of students from all backgrounds including those in marginalized groups, disabled, low socio-economic status, and more. This work will happen through inventory and assessment of current state activities while working with agencies, departments, and community partners to provide more opportunities for career exploration and development for our youngest Vermonters.

The Vermont General Assembly is actively pursuing a bill that would alter the size and membership of the State Workforce Development Board to more closely align with the

minimum number of members required to maintain compliance with WIOA. Any vacancies will be appointed after the bill passes. As of December 21, 2023, the Board is comprised of the following members:

State Government:

1. Phil Scott, Governor
2. Alison Clarkson, Senator, Vermont Senate
3. Tristan Toleno, Representative, Vermont House of Representatives

Business:

1. Adam Grinold, Executive Director, Brattleboro Development Credit Corporation (Board Chair)
2. Janette Bombardier, Chief Engineering Officer, Chroma Technology Corporation
3. Kiersten Bourgeois, Business Development & Communications Manager, St. Albans Cooperative Creamery
4. Steven Bryant, Owner, Dorset Inn
5. Brian Carpenter, General Manager, Champlain Valley Equipment
6. Kevin Chu, Executive Director, The Vermont Futures Project
7. Frank Cioffi, President, Greater Burlington Industrial Corporation
8. Margeret Pinello-White, Director of Human Resources, Blue Cross Blue Shield of Vermont
9. Monica Greene, President, Vermont Precision Tools
10. Ellen Kahler, Executive Director, Vermont Sustainable Jobs Fund
11. Becky Kapsalis, Manager of Talent Acquisition, UVM Medical Center
12. Brian Kerns, Vice President of Human Resources, Rutland Regional Medical Center
13. Joe Lemnah, CEO/Founder/Owner, Burlington Beer Company
14. Kase Long, Realtor, eXp Realty
15. Chris Loso, Vice President, Loso's Professional Janitorial Services
16. David Lynn, President/CEO, Agri-Mark
17. Greg Maguire, Director of Strategic Initiatives, Liquid Measurement Systems, Inc.
18. Corey Mathieu, Manager, Nouria
19. Jill Olson, Executive Director, VNAs of Vermont
20. Mike Posternak, Assistant Vice President, Branch Administrator, Union Bank of NH and VT

21. Kelly Putnam, Director of People and Purpose, Lawson's Finest Liquids
22. Grant Spates, Owner, Spates Construction, Inc.
23. Vacant

Core Partners:

1. *For Titles I and III*, Michael Harrington, Commissioner, Vermont Department of Labor
2. *For Title II*, Heather Bouchey, Interim Secretary, Agency of Education
3. *For Title IV*, Diane Dalmasse, Director, Vermont Division of Vocational Rehabilitation

Workforce Representatives:

1. Danielle Bombardier, Labor Representative
2. Steven Dellinger-Pate, Principal, U-32 Middle and High School
3. Pat Elmer, President/CEO, Associates for Training & Development
4. Scott Farr, Superintendent/Director River Valley Technical Center
5. Gerry Ghazi, President, Institute for American Apprenticeship at Vermont HITEC
6. Tom Longstreth, Executive Director, ReSOURCE
7. Larry Moquin, Regional Organizer, Laborers' International Union of N.A.

Locally Elected Official:

1. Tim Smith, Mayor, St. Albans City
2. Vacant

Workforce & Higher Ed (State Requirement):

1. Suresh Garimella, President, University of Vermont
2. Scott Giles, President, Vermont Student Assistance Corporation
3. Sophie Zdatny, Chancellor, Vermont State Colleges
4. Joyce Judy, President, Community College of Vermont

Others Required by State Law

1. Joan Goldstein, Commissioner, Vermont Department of Economic Development
2. Lindsay Kurrle, Secretary, Vermont Agency of Commerce and Community Development
3. Jenney Samuelson, Secretary, Vermont Agency of Human Services
4. ASSESSMENT AND EVALUATION OF PROGRAMS AND ONE-STOP PROGRAM PARTNERS

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

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



delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.

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

The six standard measures outlined in section 116(b) of WIOA, at a minimum, will be used to assess the core partner's programs. Each of these numbers will be used as a starting point to evaluate the quality, effectiveness, and areas of improvement. VDOL's annual WIOA narrative report and state Annual Workforce Report provide information on program effectiveness, outcomes, progress in supporting targeted populations, and progress in program alignment.

The SWDB will review the state's standard performance accountability measures across all programs for each program and conduct an overall assessment of the workforce system core partners. The review process will include recommendations to improve or enhance performance outcomes at the state and local levels.

The SWDB will also work to establish a workforce system measure dashboard for both public and private partners to use to evaluate Vermont's efforts to grow the workforce in Vermont.

The Workforce Development Data and Analytics team plans to create a Data Analytics Center of Excellence (COE) to support Goal 8 of the state's Strategic Goals and data-driven decision-making throughout the department.

Goals for the Workforce COE:

1. Ensuring operational excellence through a data-driven culture.
2. Supporting the development and growth of data literacy throughout VDOL's Workforce Development Division.
3. Promoting the adoption of analytics.
4. Nurturing, mentoring, guiding, and educating internal users to increase their skills and level of self-reliance.
5. Coordinating efforts and disseminating knowledge across organizational boundaries.
6. Creating consistency and transparency for the user community which reduces friction and pain points related to finding relevant data and analytics content.
7. Maximizing the benefits of self-service BI while reducing the risks.
8. Reducing technical debt by helping users make good decisions that increase consistency and result in fewer inefficiencies.

## B. PREVIOUS ASSESSMENT RESULTS

For each four-year state plan and state plan modification, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle), in accordance with methods described in 4(A). Describe how the State is adapting its strategies based on these assessments.

**Titles I & III:**

Desk and field monitoring activities are still in progress. The final reports are expected over the next year. Feedback will be provided to all leadership levels on the Workforce Development team. The findings will be combined with the one-stop operator’s assessment findings to result in changes to the programs and/or additional training.

Between PY 2021 and 2022, VDOL saw significant increases in performance in the following areas: WIOA Adult Credential Attainment rate (+19.7%), WIOA Youth Credential Attainment (+12.7%) and WIOA Youth Measurable Skill Gains (+12.8%). The department’s concerted focus on staff training and development in PY 2022 increased staff knowledge of available training programs, which resulted in more participant enrollments in training programs.

**Title II: Adult Education and Literacy**

For several years since the beginning of the pandemic, Title II programs have not met Measurable Skill Gains (MSG) targets. However, some employment rate targets and all credential rate targets were met. In the two years leading up to the pandemic (program years 2017 and 2018), Measurable Skill Gains targets were met when adult learners demonstrated increased assessed skills (reading, writing, and math). The momentum gained from meeting targets for two years in a row was lost as AEL providers served an increased number of students facing multiple barriers, including lack of childcare and transportation, lack of access to the internet, learning loss as a result of the interruption of their education during the pandemic, and increased levels of stress.

Title II	PY 21-22 Reported	PY 21-22 Targets	PY 21-22 Results	PY 22-23 Reported	PY 22-23 Targets	PY 22-23 Results
Employment Second Quarter after exit	41.73%	45%	Target not met	46.27%	43%	Target exceeded
Employment Fourth Quarter after exit	42.70%	46%	Target not met	39.84%	42%	Target not met
Median Earnings Second Quarter after exit	\$3,395.64	\$4,000	Target not met	\$4,423.21	\$3,900	Target exceeded
Credential attainment rate	68.93%	28%	Target exceeded	48.36%	40%	Target exceeded

Title II	PY 21-22 Reported	PY 21-22 Targets	PY 21-22 Results	PY 22-23 Reported	PY 22-23 Targets	PY 22-23 Results
Measurable Skills Gains	26.76%	40%	Target not met	27.29%	37%	Target not met

Targets negotiated with the U.S. Department of Education proved optimistic as programs faced multiple challenges in meeting the targets in the most difficult years of the pandemic (program years 2019-2021). The gains between program years 2021 and 2022 demonstrated in the table below are evidence of recovery for students and in the performance of AEL programs as students continue to re-engage with their education and local programs continue to increase the flexibility in service delivery – through both in-person and remote intake, orientation and instruction, and leveraging one-stop partner services for students who need other supports.

**Title IV: HireAbility/Division for the Blind and Visually Impaired**

HireAbility provides a comprehensive assessment of progress in achieving the goals and priorities in PY 22 in the core program update. Also included is a description of the new and continued strategies HireAbility will implement in PY24 and PY 25 to improve career and workforce outcomes for participants with disabilities.

C. EVALUATION

Describe how the State will conduct evaluations and research projects of activities carried out in the State under WIOA core programs; how such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA (WIOA Section 116(e)).

The Department of Labor intends to apply to participate in the next round of training as part of the Evaluation Peer Learning Cohort.

The Department's Workforce Development Division has recently established an Analytics and Insights Team that will participate in this training, review the Evaluation Toolkit on Workforce GPS, and that will ultimately support providing data to any third party evaluator. The AI Team will support the implementation of any of the evaluator's recommended changes that senior management adopts.

Evaluation efforts will be coordinated with, at minimum, the Agency of Education, the Agency of Human Services, and the State Workforce Development Board.

5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

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

A. FOR TITLE I PROGRAMS

Provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for—

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

As a Single-Area State, Vermont does not distribute funds to local areas. The Vermont Department of Labor receives and administers the local portion of Title I funding and delivers the required services for youth, adult, and dislocated worker training in the twelve local One-Stop career centers across the state.

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

See previous response.

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

See previous response.

## B. FOR TITLE II

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

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

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. Per 34 CFR § 463.24, an eligible provider must demonstrate past effectiveness by providing performance data on its record of improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy, in the content domains of reading, writing, mathematics, English language acquisition, and other subject areas relevant to the services contained in the State's application for funds. An eligible provider must also provide information regarding its outcomes for participants related to employment, attainment of a secondary school diploma or its recognized equivalent, and transition to postsecondary education and training.

There are two ways in which an eligible provider may meet the above requirements:

1. An eligible provider funded under Title II of the Act must provide performance data required under section 116 to demonstrate past effectiveness.
2. An eligible provider that has not been previously funded under Title II of the Act must provide performance data to demonstrate its past effectiveness in serving eligible individuals who are deficient in basic skills, including evidence of its success in achieving the outcomes listed above.

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 determines an organization's status as an eligible provider by obtaining performance data from the organization on its record of improving the skills of eligible individuals, particularly those with low literacy levels. The AOE takes questions and provides technical assistance to eligible providers preparing proposals. All full proposals are submitted directly to the AOE exclusively. Each eligible provider submits a single proposal to the AOE to fund one or more of sections 225, 231, and 243 and to serve one or more counties.

WIOA Title I B requires local adult education and literacy activity proposals to 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 are reviewed by the SWDB for alignment. The AOE will score responses from eligible providers using a rubric based on the 13 considerations for awarding grants as described in WIOA as pertinent to the proposed scope of work.

Title II funds will be distributed in compliance with Federal rule 34 CFR part 463, Subpart C and also with State statute and rule. Currently, the State Board of Education's Funding Formula Rule dictates how funds are distributed by county. The formula uses census data to link adult education and literacy funding to the need for services at the county level and gives weight to populations most likely to demand services.

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) and potentially other electronic means;
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, including individuals with disabilities and other special needs, to attend and complete programs;
12. whether the provider maintains a high-quality information system 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.

Funds were awarded to eligible providers of adult education and literacy services for two years, beginning July 1, 2023, to establish and operate programs that provide adult education and literacy activities within the service area of one or more particular counties. The next funding competition will occur in early 2025 for the funding period beginning July 1, 2025. All providers are subject to the same funding cycle. Providers will function as a required and valued partner in the regional AJC One-Stop Center Network, including as a partner in developing regionally relevant career pathways.

**II. DESCRIBE HOW THE ELIGIBLE AGENCY WILL ENSURE DIRECT AND EQUITABLE ACCESS TO ALL ELIGIBLE PROVIDERS TO APPLY AND COMPETE FOR FUNDS AND HOW THE ELIGIBLE AGENCY WILL ENSURE THAT IT IS USING THE SAME GRANT OR CONTRACT ANNOUNCEMENT AND APPLICATION PROCEDURE FOR ALL ELIGIBLE PROVIDERS.**

See previous response.

**C. VOCATIONAL REHABILITATION PROGRAM**

In the case of a State that, under section 101(a)(2)(A)(i) of the Rehabilitation Act designates a State agency to administer the part of the Vocational Rehabilitation (VR) services portion of the Unified or Combined State Plan under which VR services are provided for individuals who are

blind, describe the process and the factors used by the State to determine the distribution of funds among the two VR agencies in the State.

The 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 open the order routinely 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. The State determined that the Title IV distribution was based on an assessment of the potentially eligible population in Vermont. Because DBVI has historically not been able to expend Title VI-B funding, a larger portion of the award is distributed to HireAbility.

## 6. PROGRAM DATA

### A. DATA ALIGNMENT AND INTEGRATION

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

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

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

Vermont continues to work towards maximizing the efficient exchange of common data elements between the core partners. Further, Vermont's Agency of Digital Services (ADS) is a partner in managing the state's IT systems and shares the goal of using interoperable information management systems and includes this criterion when supporting system improvements. We will use the first year of this plan to refine our approach.

Vermont Department of Labor intends to move to a Salesforce based platform to administer Title I and III programs, which will increase the ability to exchange data with core partners. Additionally, we are beginning to map the different fields from our existing system to our core partner's systems so that we can share data. The State of Vermont already uses Salesforce for many applications and uses MuleSoft as the integration tool. This will enable easier transfer of data between departmental partners as they begin to use Salesforce applications.

Vermont's Title IV programs already operate on a Salesforce platform.

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

One of the goals of the State Workforce Development Board and One-Stop Operator is to develop, assess, and distribute a common intake form and process encompassing all stakeholders to ensure a warm handoff system that acknowledges all available workforce services. Implementation of a common intake will improve the efficiency and quality of services for both employers and job seekers.

The Workforce Development Data and Analytics team is investigating the use of technology to build a common intake process. To support the common intake and the State's Goal number 8, alignment of data systems, the team is also looking to create a business intelligence and reporting database. This will greatly expand our ability to provide trend analysis and support data-driven decision making. Expected state legislation will help to lay the groundwork for a data trust, which will allow the state to begin the process of establishing a longitudinal education and workforce data system.

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

The SWDB will embark on data collection, needs assessments, and providing recommendations and technical assistance to agency partners to ensure this work. In addition, the SWDB will host events, workshops, and targeted listening sessions in order to support the needs of specific communities better. In doing so, the SWDB will track progress on these efforts by evaluating all programs by their impact on the Labor Force Participation Rate, Unemployment Rate, and number of new participants served. Each year, the SWDB will assess the data to ensure priority groups are established based on need.

The SWDB's longer-term vision is for members to proactively assess progress on the re-engagement of disengaged populations and adjust efforts to uplift Labor Force Participation Rate.

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

Each core partner produces their own reports as required by WIOA. The VDOL plans to present quarterly performance analysis to the SWDB for transparency, accountability, and collaborative continuous improvement. Through these discussions, future initiatives and planning opportunities can be identified and new targets assigned. Partner attendance at these meetings will increase cross-partner collaboration and improvements that will increase positive outcomes for Vermonters.

The Vermont State Legislature is expected to set a trajectory for development of a state longitudinal data system in FY 2025. In addition to this, the Workforce Development Division will be looking for additional modernization grants to create a business intelligence reporting



database. This will allow the Center of Excellence team to develop holistic data and case reviews, extensive trend reporting and key performance indicators for the Workforce Development team. The information generated here can work towards continuous improvement reviews with our partners, improving our data driven decision making.

For Titles I & III, the Vermont Department of Labor is utilizing America's Job Link Alliance (AJLA) as its case management, job board, and reporting system. The quarterly and annual reports are available through the AJLA system. All PIRL files are generated by AJLA. The system also provides us with the files utilized by VDOL's UI system and the SWIS system to obtain the wage information that's required on the PIRLs. Our future system is expected to provide the same level of reporting capabilities.

For Title II, the Vermont Agency of Education (AOE) tracks the skill gains and secondary school graduation rates of participants through a web-based, relational database. The database houses each AEL participant's engagement in postsecondary education and employment outcomes obtained through data matches with service provider partners. Using the database, 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. The database 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.

For Title IV, HireAbility (DVR) and DBVI utilize the AWARE case management system to track participant engagement in post-secondary education programs. The agencies collect data on postsecondary education progress and completion through the National Student Clearing House. For credentialed programs not tracked through the clearing house staff collect transcripts or other verification documentation. HireAbility 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 participant information, is captured.

Common Performance Measures that are submitted by DVR and DBVI use several data exchanges to add to and validate data already stored in our case management system based on information collected during the life of a case. To validate credential and MSG related data, participants' educational data are compared to data provided by the Vermont Agency of Education and the National Student Clearinghouse. For determining post-exit employment data, quarterly data exchanges between Vermont Department of Labor and the State Wage Interchange System (SWIS) provide both evidence of employment and earnings information. Relevant data are added to the case management system at the participant level and included in federal reporting for Sec 116.

Across all programs, when there is a requirement to report on co-enrollments, or on matters where multiple parts of the workforce development system are interacting with, for instance, businesses, Agency staff engage in secure file transfer processed to combine files and report on outcomes from the separate systems.

## 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.

Workforce Development plans to implement post-participation surveys, which will be supported technically through continual modernization of our case management software and reporting tools. The surveys are an additional analysis point for program evaluations. The reporting tools will provide data-driven insights that can also be used to improve the programs.

In terms of quantitative analysis, we will expand access to existing data sources (e.g., National Student Clearinghouse) so that we can begin to have a more accurate picture of the impact of the workforce development system on post-program success.

In terms of qualitative analysis, we will develop and utilize surveys and conduct follow-up calls with randomly selected participants and will hold focus groups with the key populations identified in this state plan (e.g., youth, new Americans, adults without diplomas, SNAP and TANF participants)

The Center of Excellence, mentioned previously, will provide mentoring and best practices relative to data review. The COE will facilitate knowledge sharing and provide training to improve the data literacy of Workforce Development staff so that all staff is working at the same level in terms of data-informed decision-making.

The Agency of Education requires local AEL providers to track exited students' participation in post-secondary education using a state-approved follow-up survey method. Local providers enter survey results in the web-based AEL database.

HireAbility and DBVI utilize the AWARE case management system to track participant engagement in post-secondary education programs. The agencies collect data on postsecondary education progress and completion through the National Student Clearing House. For credentialed programs not tracked through the clearing house, staff collect transcripts or other verification documentation.

## 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 (UI) division is located within VDOL. The UI Division provides employee wage data through MOUs with partner agencies. Additionally, the UI Division, along with the core partners, have signed onto the State Wage Interchange System (SWIS) agreements on behalf of Vermont as of December 2019 to receive out-of-state wage records for program participants. In December 2023, the SWIS amendments to expand this to the RESEA and RA programs were approved by all states and the SWIS authority.

Through the core partner data share agreement, the Agency of Education accesses UI wage records housed at the Vermont Department of Labor to gather pertinent data for Federal reporting purposes. Performance accountability measures that require using this data are employment in the second and fourth quarters after exit and median earnings in the second quarter after exit.

HireAbility and DBVI use UI wage records made available through the core partner data-sharing agreement to measure the median earnings and job retention measures under the Common Performance Measures.

#### 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.

Protecting privacy is of the utmost importance to the State of Vermont. Each core partner has policies and procedures in place to protect and safeguard data. The Agency of Digital Services ensures that technology and related infrastructure is secure. Users of the State's IT systems receive regular training on how to protect the infrastructure and sensitive data.

To protect the information that Vermont JobLink collects, the following industry-standard security measures are maintained:

- Limiting the people who have access to the database servers;
- Masking the display of Social Security numbers;
- Using Transport Layer Security (TLS) encryption to ensure that data passed between the user's browser and the web server remains private and secure; and
- Using individual password protection so only the account owner can access the account.

To ensure the protection of participant privacy, the core partner programs agree to secure handling of data-sharing information. Relevant memoranda of understanding (MOUs) between the core program partners require the security of all sensitive information, and each partner ensures that the collection and use of information is following all applicable federal and state laws. Each partner verifies that relevant information is only made available to authorized staff and that information is only made available for the limited purpose necessary to perform a required responsibility.

Vermont's Agency of Administration's Center for Achievement in Public Service (CAPS) provides staff training to all state agencies and departments. Courses include training such as Safeguarding Confidential Information, Lessons on Phishing, Ransomware, and Cloud Security Lessons. Lessons are mandatory on a yearly basis.

In addition, per Sec. 444 of the General Education and Provisions Act, educational records are kept secure and are not released without the written consent of parents, guardians or students as may be applicable.

## 7. PRIORITY OF SERVICE FOR VETERANS.

A. DESCRIBE HOW THE STATE WILL IMPLEMENT THE PRIORITY OF SERVICE PROVISIONS FOR COVERED PERSONS IN ACCORDANCE WITH THE REQUIREMENTS OF THE JOBS FOR VETERANS ACT, CODIFIED AT SECTION 4215 OF 38 U.S.C., WHICH APPLIES TO ALL EMPLOYMENT AND TRAINING PROGRAMS FUNDED IN WHOLE OR IN PART BY THE DEPARTMENT OF LABOR.

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

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

1. Describe how the State will implement the priority of service provisions for covered persons in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor.

Vermont is dedicated to serving all Veterans throughout the state by connecting them to the education and training necessary 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. The state is also committed to increasing awareness of available Veterans' services among the WIOA partners to ensure that there is "no wrong door" for a Veteran seeking employment. All case managers and counselors will have a clear understanding of both available services and how to refer appropriately.

Individuals enter the workforce development system in one of two ways: by visiting a Vermont Department of Labor (VDOL) One-Stop Career Center or through the online Vermont JobLink (VJL) registration system. Regardless of the entry point, customers, whether they are Veterans or a spouse of a Veteran, are asked to self-identify their Veteran status to ensure they can take full advantage of the available services to Veterans.

Priority of service is clearly understood by all AJC staff. An AJC staff member determines the eligible person's purpose for registering. Once the Veteran or other eligible person is identified, the AJC Staff member conducts an initial assessment using a customized intake questionnaire. By determining if the Veteran or other eligible person has a significant barrier to employment (SBE), via self-identification, or if they are a member of another special priority group. If a determination is made that the client is a Veteran with an SBE or meets other special criteria, they are referred to the DVOP or consolidated position (CP) for further assessment and Individualized Career Services. Those Veterans determined not to possess an SBE are provided career services and training as needed by the AJCC staff and receive priority of service. Additionally, each of the 11 AJCs offer a priority of service area with resources prominently posted that are available to support all Veterans with their job search, training services and community resource needs. This includes the designation of desktop or tablet systems that are designated for use by Veterans in the AJCs before other job seekers.

2. Describe how the State will monitor priority of service provisions for veterans.

In conjunction with the Veterans' Employment and Training Service (VETS) lead, the VDOL Veterans' Program Administrator is responsible for regular monitoring of priority of service. This monitoring occurs at the local level with regional managers in the AJC's checking on service delivery systems to ensure compliance with internal policies and procedures. This monitoring is done using the VDOL MIS system, Vermont Job Link, where all services and dates of service are tracked.

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

After Veteran status is determined as noted above, individuals are asked to provide more detailed information on an intake and intensive services determination form. If they respond affirmatively, they are immediately informed of their priority of service status and entitlement to priority of service. This includes all priority of service employment, training and placement services and applicable eligibility requirements for those programs and services. These training services may be provided through the referral from the DVOP to apprenticeship opportunities, on-the-job training, VR&E program WIOA programs and other job placement services. That may include a referral to the LVER, CP or business outreach member once the client is job placement ready. If it is determined the individual does not have a significant barrier to employment, 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 One-Stop Career Center staff connect them immediately with a Disabled Veteran's Outreach Program (DVOP) and CP from the Jobs for Veterans State Grants program (JVSG). If a DVOP or CP is unavailable to see the individual immediately, then non-JVSG staff may provide immediate services if applicable, until the DVOP or CP is available and able to provide services.

The DVOP or consolidated position (CP) may serve eligible Veterans and spouses who attest to experiencing a significant barrier as defined in VETS most recent guidance (VPL-03-14 Change 2) provide individual career services and facilitate placements to meet the employment needs of Vermont's eligible Veterans and eligible persons. The DVOP/CP helps to identify appropriate job opportunities for the Veteran's employment goals and assist the Veteran in developing a cover letter and a resume that target those jobs. As part of the orientation, the Veteran will discuss their work search strategies, complete an individual employment plan (IEP) and establish the next appropriate step in their career plan. Vermont has two full-time and one half-time DVOP specialists who serve Vermont's eligible Veterans and eligible persons. We plan to have a DVOP (Rutland, VT) become a consolidated position within the first year of the plan.

All DVOP, CP and LVER staff are trained on all services and placement strategies available to Veterans, through the National Veteran Training Institute, national and state conferences and training sessions. DVOP and CP provide information-sharing and capacity building for the AJC. The LVER staff offers training to One-Stop partners who can be referral sources when a Veteran applies for services through their programs. Currently, Veterans working with a vocational rehabilitation counselor are referred to the DVOP and CP for additional services and support. LVERs and CP also working with vocational rehabilitation's employment consultants, explore potential employers on behalf of the Veteran, to leverage contacts of both. By offering trainings on DVOP, CP and LVER services to our WIOA partners, we hope to increase both visibility of the

program and referrals for services from our Veteran services staff members through the One-Stop system.

#### 8. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR INDIVIDUALS WITH DISABILITIES

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

VDOL follows the practices outlined in Section 508 of the U.S. Rehabilitation Act and Level A.A. of the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines 2.0. These guidelines help us make our website more accessible to people with disabilities, ensuring a user-friendly experience for everyone. We regularly test our pages using tools like WAVE (Web Accessibility Evaluation), Interactive Accessibility Toolkit, aXe Developer Tools, and the NVDA (NonVisual Desktop Access) screen reader.

Our One-Stop partners in Vermont have reviewed our delivery system to guarantee that all employment, education, and training programs are available and accessible. Together, we provide resources to individuals who need specific assistance in overcoming barriers to employment.

Vermont's comprehensive American Job Center (AJC) offers physical and virtual services, creating an integrated setting for individuals to receive assistance. Orientations and workshops occur in integrated settings unless someone requests or needs a separate service.

Throughout the period covered by this plan, the Vermont Department of Labor (VDOL) aims to provide inclusivity training to all One-Stop staff and any/all core partner staff.

VDOL plans to update workstations in resource areas to offer the latest assistive technology. In 2023, the Vermont Department of Labor received a grant to conduct an accessibility and equity audit of customer access points to VDOL's Unemployment Insurance Program, including the AJC/Resource Centers. Recommendations from the audit will be implemented to improve accessibility and ensure equity.

Reporting directly to the Governor, the Commissioner of Labor appointed the Director of Workforce Development (who reports to the Commissioner) as the Vermont Department of Labor's recipient-level Equal Opportunity (E.O.) Officer. The Department's Equal Opportunity and Accessibility Manager provides Language Access and EO-related training and resources to Department staff.

- All recipients under WIOA Title I financial assistance must give initial and ongoing notice that they do not discriminate.

- Recipients include state-level agencies, State Employment Security Agencies, State Workforce Investment Boards, WIOA grant recipients, One-stop operators, and One-stop partners.
- The notice must be provided to registrants/applicants, participants, applicants for employment, and employees in WIOA-funded programs, unions, professional organizations, sub-recipients, and the public.
- Recipients must communicate effectively with individuals with disabilities and provide the notice in appropriate languages.

#### Equal Opportunity Notice Poster (29 CFR 38.35)

- Posters in English and Spanish must be prominently displayed to communicate equal opportunity and nondiscrimination.
- "Equal Opportunity is the Law" posters are available through VDOL.

#### "Equal Opportunity is the Law" Signature Form

- Individuals registered in WIOA should read, understand, and sign the complaint procedure signature form available in four languages.
- Service providers must provide the form to current and new employees and ensure they read, understand, and sign it. Copies go to the employee and their personnel file.
- The appropriate display of posters must cover applicants for WIOA services or employment.

#### Notification of Grievance Due Process

- All WIOA Title I and National Emergency Grant participants must be informed of their right to file a grievance within 180 days and have the opportunity for an informal resolution, including a hearing within sixty days. Verification of notification must be included in participant files.

Both Section 504 of the Rehabilitation Act and the Americans with Disabilities Act (ADA) are concerned with protecting the rights of individuals with disabilities by ensuring that they have equal access to employment and educational opportunities. Adult Education and Literacy learning centers must provide physically accessible spaces that comply with applicable physical accessibility standards and must ensure communications with individuals with disabilities are as effective as communications with individuals without disabilities. Also, under the Americans with Disabilities Act, all programs must provide reasonable accommodations to learners with documentation of diagnosed disabilities. The Vermont Agency of Education and AEL providers are committed to providing support services that align with our vision and mission and comply with applicable laws and regulations. Therefore, AEL learning centers will make every effort to provide reasonable accommodations when it can be demonstrated that doing so would not fundamentally alter the nature of the service, program, or activity. It is the participant's responsibility to request accommodations and provide the necessary documentation supporting the request. Many participants may not be initially privy to the rights afforded them and are informed of protections under the ADA. Therefore, AEL providers must have a published nondiscrimination policy, and information must be provided to students at intake. Ongoing

notifications to the public and participants regarding ADA compliance and adherence to nondiscrimination of protected classes should be implemented.

#### 9. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR INDIVIDUALS WHO ARE ENGLISH LANGUAGE LEARNERS

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials. Describe how English language learners will be made aware of the opportunity to enroll and/or co-enroll in all the core programs for which they are eligible.

In Governor Scott's FY2024 Budget Address, he discussed his commitment to support New Americans in Vermont, including English language learners. Through this commitment, Vermont's Office of Racial Equity received \$2.3M in funding to translate key documents across state government. The SWDB, the Office of Racial Equity, and a contracted vendor will work to translate key workforce support services documents. This action will include anything from a document explaining SNAP benefits to a resource provided regarding employment at one of our One-Stop Operator locations. Translating these documents, therefore helping to make workforce development resources more readily available, will be a critical step towards welcoming newcomers and fostering a more inclusive environment in Vermont.

Based on yearly recommendations from the Office of Racial Equity regarding Vermont's most common languages, the SWDB will monitor and maintain the most useful workforce development-related documents and ensure they are accessible in all common languages.

#### **Supporting English Language Learners in Vermont**

Vermont is committed to assisting English Language Learners through various initiatives:

#### **Collaboration with Vermont State's Office of Racial Equity (ORE):**

- Staff attend ORE conferences and training for ongoing improvement, seeking feedback to enhance equity in State programs.

#### **Implementation of ORE's 2023 Report Recommendations:**

- Tracking expenditures on interpretation and translation to forecast needs.
- Translating vital documents into languages spoken by Vermonters.
- Providing staff training on Best Practices for Serving Clients with Language Access Needs.

#### **Professional Interpretation and Translation Services:**

- The State of Vermont Buildings and General Services maintains contracts with local and national providers, ensuring accurate and confidential interpretation services.
- Written notices and a "Babel Notice" inform customers that free language assistance is available at no cost.



**Hiring Manager Training:**

- Training hiring managers on recruiting, hiring, and retaining diverse talent.

**Outreach to Diverse Workforce:**

- Developing an effective outreach strategy for Vermont's diverse workforce, including agricultural workers, asylum seekers, humanitarian parolees, etc., in collaboration with community partners.

**Supporting Career Advancement:**

- Supporting the career advancement of New Vermonters and recent immigrants through professional mentoring, networking, career counseling, and access to higher-level training and upskilling opportunities.

**Toolkit for Employers:**

- Updating and providing a toolkit for employers with best practices in accessing and retaining New American workers.

Per WIOA, Adult Education and Literacy providers must “assist immigrants and other individuals who are English language learners in improving their reading, writing, speaking, and comprehension skills in English and mathematics skills; and [in] acquiring an understanding of the American system of government, individual freedom, and the responsibilities of citizenship.” All AEL providers offer English language instruction to develop skills in listening, speaking, reading, and writing in English. The AEL providers implementing the Integrated English and Civics Education program have multilingual websites. Some English language learners participating in AEL services hold degrees and credentials earned in other countries. These professionals seek better English communication skills and services, leading to unsubsidized employment. Referrals to one-stop partner programs are frequent and ongoing, based on students' individual needs for services and support.

#### 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.

VDOL (which includes WIOA Titles I and III Staff, TAA, Registered Apprenticeship, RESEA, JVSG, FLC, and WOTC), AOE, and VR leadership will meet at least quarterly to carry out the goals of the state, confer on policy initiatives, and share information about system-level strengths, weaknesses, and opportunities.

VDOL and VR leadership and regional will engage in regular facilitated meetings to help jointly implement the state's workforce goals and strategies.

VDOL, AOE, VR, and DBVR met throughout the WIOA state planning development process to coordinate individual and collective planning. All core partners participated in SWDB-led strategic planning processes. VDOL program administrators, all of whom were included in developing this plan. Program administrators will meet at least monthly with the Workforce Development leadership to plan and evaluate performance.

Core partners will meet at least quarterly with the State Workforce Development Board to review and evaluate performance and to adjust planned activities as the situation warrants.

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

The Unified or Combined State Plan must include assurances that:

The State Plan must include	Include
1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;	Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;	Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;	Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board,	Yes

The State Plan must include	Include
including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	
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	Yes

The State Plan must include	Include
delivery of programs or services funded directly, in whole or in part, by the Department of Labor.	

**VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS**

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

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

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

**A. GENERAL REQUIREMENTS**

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

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

Vermont operates as a Single-Area State with the whole state comprising a single region and the entirety of the local workforce development area. Because of Vermont’s size, the population is smaller in comparison with other states. Therefore, Vermont is more efficient and equitable for individuals to access services from a standardized state workforce development system. The services delivered by the required WIOA program partners are available at Vermont’s comprehensive One-Stop American Job Center (AJC) located in Burlington. Affiliate One-Stop Career Resource Centers are in Barre, Bennington, Brattleboro, Rutland, St. Albans, and St. Johnsbury. Satellite One-Stop Career Resource Centers are in White River Junction, Middlebury, Springfield, and Newport. The strategic placement of these locations allows for services to be offered regardless of where an individual resides.

As a Single-Area state, none of the policy and process items under General Requirements are applicable, and therefore, no response is provided.

**B. DESCRIBE THE PROCESS AND POLICY USED FOR DESIGNATING LOCAL AREAS, INCLUDING PROCEDURES FOR DETERMINING WHETHER THE LOCAL AREA MET THE CRITERIA FOR “PERFORMED SUCCESSFULLY” AND “SUSTAINED FISCAL INTEGRITY” IN ACCORDANCE WITH 106(B)(2) AND (3) OF WIOA. DESCRIBE THE PROCESS USED FOR IDENTIFYING REGIONS AND PLANNING REGIONS UNDER SECTION 106(A) OF WIOA. THIS MUST INCLUDE A DESCRIPTION OF HOW THE STATE CONSULTED WITH THE LOCAL BOARDS AND CHIEF ELECTED OFFICIALS IN IDENTIFYING THE REGIONS**

As a Single-Area state, none of the policy and process items under General Requirements are applicable; therefore, no response is provided.

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

As a Single-Area state, none of the policy and process items under General Requirements are applicable; therefore, no response is provided.

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

As a Single-Area state, none of the policy and process items under General Requirements are applicable; therefore, no response is provided.

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

Vermont uses its authority to set aside 15% of Title I Funds to support employment and training activities under WIOA, as described in 20 CFR § 682.200. Decisions about how to spend the 15% reserve are made by the Commissioner of Labor as the head of the State Workforce Agency (SWA) and designated leader of workforce development in state statute. Vermont will also reserve 20% of the dislocated worker funds to conduct rapid response activities.

B. DESCRIBE HOW THE STATE INTENDS TO USE GOVERNOR'S SET ASIDE FUNDING FOR MANDATORY AND DISCRETIONARY ACTIVITIES, INCLUDING HOW THE STATE WILL CONDUCT EVALUATIONS OF TITLE I ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES.

Vermont uses its authority to set aside 15% of Title I Funds to support employment and training activities under WIOA, as described in 20 CFR § 682.200. Decisions about how to spend the 15% reserve are made by the Commissioner of Labor as the head of the State Workforce Agency (SWA) and designated leader of workforce development in state statute. Vermont will also reserve 20% of the dislocated worker funds to conduct rapid response activities.

In addition to using the Governor's set aside funding to conduct all of the required statewide employment and training activities in 20 CFR § 682.200, Vermont plans to prioritize activities that are aligned with the State Workforce Development Board's strategic goals, identified in this plan. We expect to prioritize use of set-aside funds for the following:

- Evaluation of the activities of the Adult, Dislocated Worker, and Youth programs, as noted on the core planning elements. The Department of Labor intends to apply to participate in the next round of training as part of the Evaluation Peer Learning Cohort. The use of Governor's set aside for evaluation will be determined by the outcomes of that peer learning cohort. The Department's Workforce Development Division has recently established an Analytics and Insights Team that will participate in this training, review the Evaluation Toolkit on Workforce GPS, and that will ultimately support providing data to a third party evaluator. The AI Team will support the implementation of any of the evaluator's recommended changes that senior management adopts.

Evaluation efforts will be coordinated with, at minimum, the Agency of Education, the Agency of Human Services, and the State Workforce Development Board.

Other activities as required by the act:

- Required rapid response activities, as described in § 682.310;
- Disseminating by various means, as provided by WIOA sec. 134(a)(2)(B):
  - The State list of eligible training providers (including those providing non-traditional training services), for adults and dislocated workers and eligible training providers of registered apprenticeship programs;
  - Information identifying eligible providers of on-the-job training (OJT), customized training, incumbent worker training, internships, paid or unpaid work experience opportunities and transitional jobs;
  - Information on effective outreach and partnerships with business;
  - Information on effective service delivery strategies and promising practices to serve workers and job seekers;
  - Performance information and information on the cost of attendance, including tuition and fees, consistent with the requirements of §§ 680.490 and 680.530 of WIOA;
  - A list of eligible providers of youth activities as described in WIOA sec. 123; and
  - Information of physical and programmatic accessibility for individuals with disabilities;
- Providing technical assistance to State entities and agencies, and one-stop partners in carrying out activities described in the State Plan, including coordination and alignment of data systems used to carry out the requirements of this Act;
- Assisting one-stop operators, one-stop partners, and eligible providers, including development of staff, including staff training to provide opportunities for individuals with barriers to employment to enter in-demand industry sectors or occupations and nontraditional occupations, and the development of exemplary program activities;
- Carrying out monitoring and oversight of activities for services to youth, adults, and dislocated workers under WIOA title I, and which may include a review comparing the services provided to male and female youth;
- Providing additional assistance to local areas that have a high concentration of eligible youth; and
- Operating a fiscal and management accountability information system, based on guidelines established by the Secretary.

The use of the Governor's set-aside may also include these permissible uses:

- State administration of the adult, dislocated worker and youth workforce investment activities, consistent with the five percent administrative cost limitation at WIOA sec. 134(a)(3)(B) and § 683.205(a)(1) of this chapter;
- Developing strategies for serving individuals with barriers to employment, and for coordinating programs and services among one-stop partners;
- Development or identification of education and training programs that have the characteristics referenced in WIOA sec. 134(a)(3)(A)(iii);
- Supporting the development of alternative, evidence-based programs, and other activities that enhance the choices available to eligible youth and which encourage youth to reenter and complete secondary education, enroll in postsecondary education and advanced training, progress through a career pathway, and enter into unsubsidized employment that leads to economic self-sufficiency;
- Supporting financial literacy activities as described in § 681.500 of this chapter and WIOA sec. 129(b)(2)(D);
- Providing technical assistance to one-stop operators, one-stop partners, and eligible providers in local areas on the development of exemplary program activities and on the provision of technology to facilitate remote access to services provided through the one-stop delivery system in the State;
- Carrying out activities to facilitate remote access to training services provided through the one-stop delivery system;
- Activities that include:
  - Activities to improve coordination of workforce investment activities, with economic development activities; and
  - Activities to improve coordination of employment and training activities with child support services and activities, cooperative extension programs carried out by the Department of Agriculture, programs carried out by local areas for individuals with disabilities (including the programs identified in WIOA sec. 134(a)(3)(A)(viii)(II)(cc)), adult education and literacy activities including those provided by public libraries, activities in the correction systems to assist ex-offenders in reentering the workforce and financial literacy activities; and
  - Developing and disseminating workforce and labor market information;
  - Developing and disseminating common intake procedures and related items, including registration processes, across core and partner programs; and
  - Coordinating activities with the child welfare system to facilitate provision of services for children and youth who are eligible for assistance under sec. 477 of the Social Security Act.

C. DESCRIBE HOW THE STATE WILL UTILIZE RAPID RESPONSE FUNDS TO RESPOND TO LAYOFFS AND PLANT CLOSINGS AND COORDINATE SERVICES TO QUICKLY AID COMPANIES AND THEIR AFFECTED WORKERS. STATES ALSO SHOULD DESCRIBE ANY LAYOFF AVERSION STRATEGIES THEY HAVE IMPLEMENTED TO ADDRESS AT RISK COMPANIES AND WORKERS.

### **Rapid Response**

The VDOL Business Services Manager serves as the State Rapid Response Coordinator and, as such, coordinates all layoff events, both WARN and non-WARN. Vermont has a separate law, Notice of Potential Layoff, that requires notification for many layoff events that do not meet the WARN threshold. Through a system of online and email notifications and reports from partners and regional career center staff, notification is received and shared with all required partners. Either regional staff or the Business Services Manager makes initial contact with the business to assess the scope of the layoff timeline and identify unique needs. Virtual and/or in-person Rapid Response information sessions are scheduled and delivered. These presentations include information from Unemployment Insurance, Vermont Health Connect, HireAbility (VR), and additional partners as appropriate. Impacted workers are connected directly to their regional career center for follow-up reemployment services. One area for potential expansion that is being explored is the idea of issuing every impacted worker a certificate indicating their eligibility for On-The-Job Training. As VDOL looks to expand the use of the OJT model, there will be a need to increase awareness of this tool with the business community and streamline the paperwork to simplify its use for both the trainee and the employer.

D. DESCRIBE THE STATE POLICIES AND PROCEDURES TO PROVIDE RAPID RESPONSES IN CASES OF NATURAL DISASTERS INCLUDING COORDINATION WITH FEMA AND OTHER ENTITIES.

In the first year of this state plan, the Workforce Development Division will establish a centralized disaster response team (DRT). This team will convene and facilitate advanced disaster response planning focused on employment and training in each of our five service regions. These E&T disaster response planning sessions will include community and training partners.

In the event of a natural disaster, the DRT will activate plans and convene partners immediately to coordinate a comprehensive response specific to the situation. The work of the DRT shall include activities necessary to plan and deliver services to support volunteers and enable relocated workers to transition to new employment as quickly as possible following a natural or other disaster resulting in a mass job dislocation. As appropriate to the level and/or nature of dislocation, the Workforce Development Division will convene a partners' meeting comprised of policy-level decision-makers from core partners and others as needed. This meeting may include, but not be limited to:

- The Governor's Office staff
- Executive Committee of the State Workforce Development Board
  - Includes Commissioner of Labor, Secretary of Education, Secretary of Human Services, Secretary of Commerce and Economic Development
- Vermont Department of Labor, Unemployment Insurance Division



- Vermont Department of Labor, Workforce Development Division
  - Including Regional Managers in affected areas
- Area elected officials

The responsibility of the DRT is to develop a Rapid Response strategy and identify resources to determine needed services and the most efficient delivery of services. This may include coordination with the State Emergency Operations Center, State-operated multi-agency resource centers (MARC)s, FEMA, Red Cross, and the Small Business Administration, if appropriate and necessary.

**E. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) AND ENSURES THE PROVISION OF APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED.**

(SECTION 134(A)(2)(A) AND TAA SECTION 221(A)(2)(A) .) THIS DESCRIPTION MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE WORKERS IN THE GROUPS IDENTIFIED IN THE TAA PETITIONS WITH AN ACCURATE UNDERSTANDING OF THE PROVISION OF TAA BENEFITS AND SERVICES IN SUCH A WAY THAT THEY ARE TRANSPARENT TO THE DISLOCATED WORKER APPLYING FOR THEM (TRADE ACT SEC. 221(A)(2)(A) AND SEC. 225; GOVERNOR-SECRETARY AGREEMENT). DESCRIBE HOW THE STATE WILL USE FUNDS THAT HAVE BEEN RESERVED FOR RAPID RESPONSE TO PROVIDE SERVICES FOR EVERY WORKER GROUP THAT FILES A TAA PETITION AND HOW THE STATE WILL ENSURE THE PROVISION OF APPROPRIATE CAREER SERVICE TO WORKERS IN THE GROUPS IDENTIFIED IN THE PETITION (TAA SEC. 221(A)(2)(A)).NOTE: UNTIL THE TAA PROGRAM IS REAUTHORIZED, THE REQUIREMENTS TO PROVIDE RAPID RESPONSE AND APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A PETITION HAS BEEN FILED IS NOT APPLICABLE.

In the next four years, the use of layoff aversion will also be researched and deployed. As VDOL continues to strengthen its partnership with state and regional economic development partners and establishes the Workforce Expansion teams, this will allow for consistent, timely communication with businesses to identify signs of business contraction earlier.

All layoff events are reviewed for possible TAA certification, and when petitions are certified, separate TAA Information Sessions are scheduled. Outreach via USPS is sent to impacted workers to notify them of these information sessions. Workers are connected directly to TAA Case Management staff in their region for assessment and training services. Since July 1, 2022, no petitions have been filed due to the lack of reauthorization of the TAA program.

**B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS**

**1. WORK-BASED TRAINING MODELS**

If the State is utilizing work-based training models (e.g. on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State’s strategies for how these models ensure high quality training for both the participant and the employer.

Work-based training models afford a plethora of benefits to participants, including:

1. Connecting classroom learning to the real world.
2. Providing opportunities to practice skills in real-world scenarios.
3. Helping develop interpersonal and workplace effectiveness skills (soft skills).
4. Providing a chance to observe professionals in action.
5. Helping network with potential employers.
6. Giving the opportunity to explore different interest areas.

Employers are heavily relied upon to provide participants with positive and meaningful work-based learning opportunities. They must be designed to establish a work history for the individual, demonstrate success in the workplace, and develop the skills that lead to entry into and retention in unsubsidized employment. Building credible relationships with employers is critical to the success of any work-based training program.

It's the responsibility of VDOL Job Center Specialists to connect participants with employers who are willing to provide a work-based learning opportunity. Job Center Specialists work alongside participants and employers to ensure a successful experience and provide case management services, including support services during the experience. Further exploration is done to determine if any credentials are needed to add value to the position's success.

Work-based training enhances opportunities for underrepresented populations to explore and experience career pathways that will allow them to thrive and eventually contribute to the workforce system. Providing VDOL staff professional development opportunities for working with underrepresented populations is critical to a successful and meaningful work-based learning opportunity. Providing employers with the resources, tools, and strategies they need to support underrepresented populations is just as important. The planning and development of this initiative are in their infancy but will advance in the next several years.

The VDOL intends to build on its professional development for staff over the next two years specific to underrepresented populations, including women, minorities, Veterans, people with disabilities, and those involved in the justice system. In addition, it provides employers with learning opportunities and tools that will assist them in working with underrepresented populations.

Marketing and promoting the work-based training models to employers, providers, and partners is essential in promoting the opportunities. It will be a goal of workforce development over the coming years.

Vermont has several types of work-based training models, including transitional jobs, on-the-job training, and registered apprenticeships.

A transitional job is a time-limited work experience that is wage-paid, 100% subsidized, and is in a public, private, or non-profit sector for those individuals with barriers to employment who are chronically unemployed or have inconsistent work history.

Transitional jobs are utilized for participants to realize their true passion and begin to explore career pathways. Participants can gain real-world experience as they sharpen their skills, build their resumes, and network with professionals in their field of choice.

On-the-job training (OJT) is training in the public or private sector given to a participant who, under the agreement, is hired by the employer, with training to occur while the participant is engaged in productive work. An OJT provides knowledge or skills essential to adequate job performance. WIOA includes reimbursement to the employer of up to 50% of the participant wage rate for the cost of providing the training and additional supervision related to the training for a limited period.

Attracting and retaining employees is crucial in any industry, especially now. An OJT allows the employer to teach the employee to understand precisely what duties they are expected to complete and exactly how to meet them. An OJT can help with faster onboarding and getting an acceptable level of performance. It allows employees to learn processes in an organization faster and more efficiently.

Vermont realizes that the process for an OJT may be viewed as a burden on employers, which deters them from taking advantage of the program. Within the following year, the existing OJT policy will be reviewed and rewritten to offer a more seamless process for employers. Vermont will explore policies and procedures of other states and develop the most effective policy and procedure specific to Vermont employers. Once the policy and procedures are finalized, staff will receive training. In addition to the technical training staff will receive, they will also receive training on how to "sell" employers on the idea of an OJT.

To attract employers to this program, marketing materials will also be developed within the next year to emphasize the program's benefits.

There is also potential to expand Vermont's work-based training models, including customized training and incumbent worker training. To meet the needs of employers by enhancing opportunities, the following models will be explored and potentially implemented into policy.

**A customized training model:**

- (a) That is designed to meet the special requirements of an employer (including a group of employers);
- (b) That is conducted with a commitment by the employer to employ an individual upon successful completion of the training; and
- (c) For which the employer pays for a significant cost of the training, as determined by the State Workforce Board in accordance with the factors identified in WIOA sec. 3(14).

The Department of Economic Development (DED) generally supports the incumbent worker training model with state funds. However, because cross-program planning promotes a shared understanding of the workforce needs within the state, and it is an allowable activity under WIOA, further exploration of this model is beneficial.

**Incumbent worker training** is a training resource that helps businesses respond to changing skill requirements caused by new technology, re-tooling, new product lines, or new organizational structuring. It helps to offset the cost of training employees who have worked for a business consistently for six months or more. The program is designed to provide direct financial assistance to train current employees to avert layoffs and/or improve the economic competitiveness of local businesses. The program reimburses eligible businesses for specific training costs accrued during training.

## 2. REGISTERED APPRENTICESHIP

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., outreach to sponsors and prospective sponsors, identifying potential participants and connecting them to apprenticeship opportunities).

Over the period covered by this plan, the Department plans the following activities, which are aimed at 1) increasing the use of Registered Apprenticeship as a training model in the state and 2) integrating Registered Apprenticeship as a core element of Vermont's Workforce Development Strategies. These activities include, but are not limited to:

### Increase Apprenticeship Literacy

1. Regular training with VDOL Job Center Specialists on how best to support job seekers looking to be apprentices, including resources to support the apprentice;
2. Regular training and challenges for the VDOL Business Services team on how to conduct outreach to businesses and how to discuss the requirements of the program;
3. Regular meetings and training with core partners to improve their literacy with apprenticeships.

### Supports to employers

1. Work with core partners to contribute to the design of apprenticeship programs and to provide technical assistance to employers related to services and programs available through the partners.

### Funding

1. Using available state and federal funds, develop projects and opportunities for employers and partners to work together to develop and administer a registered apprenticeship training program, including pre-apprenticeships and youth apprenticeships where appropriate.

The complete set of strategies and activities of the Registered Apprenticeship program will be outlined in a 5-year state plan for registered apprenticeship, required by state law. The first version of this plan will be completed by July 1, 2024.

## 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).

An administrative bulletin outlining the process, information, and application requirements for training providers to become and remain eligible to list their programs on Vermont's Eligible Training Provider List (ETPL) was released on July 1, 2022. (ADMINISTRATIVE MEMO 034 – ETPL Registration Guidelines)

The workforce development system established under WIOA promotes informed consumer choice, job-driven training, performance transparency, and continuous improvement. The ETPL is used by individuals enrolled in Workforce Innovation and Opportunity Act (WIOA) Title I

programs to decide enrollment in training programs for which Title I funds will be used to pay tuition and other education-related costs. The ETPL provides information to participants about training programs to help them make decisions related to career advancement. WIOA participants use this information to develop a training plan with their VDOL Job Specialists. Plans that include training programs listed on the ETPL may use WIOA Title I funds to help pay for allowable costs.

Vermont has made great strides in improving the application and approval process for training providers, making it an automated application process. A webinar was provided to train providers on the new application and reporting process. Job Training, Education, and Apprenticeship | Department of Labor ([vermont.gov](http://vermont.gov))

Federal law requires training providers who list a program on the ETPL to provide performance data for all participants each year. This requirement is intended to provide critical information regarding the employment, earnings, and credentials outcomes attained by individuals in the programs of study deemed eligible to receive funding under WIOA Title I.<sup>13</sup> The purpose of these reports is to assist WIOA participants and members of the public in identifying effective training programs.

Our ETPL policy includes the following initial eligibility criteria:

Description of each program of training services to be offered.

Information concerning whether provider is in a partnership with a business

Our ETPL policy includes the following required continued eligibility criteria:

ETP's ability to provide trainings that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment, including individuals with disabilities.

The state must define a "substantial violation of the requirement to timely and accurately submit all required information" as meaning failure to submit an accurate report within 45 days of the reporting deadline.

For Registered Apprenticeship programs, the VDOL will continue working through the first year of this plan to improve the listing process on the ETPL for registered sponsors. Our policy will require:

The Sponsor to provide certain information when applying to be on the list including:

Occupations to be included in the RAP

The name and address of the Sponsor

The name(s) and addresses of the Related Technical Instruction providers and the locations of the instruction if different from the program sponsor's address

The method and length of instruction

The number of active apprentices

Vermont is a small state with limited resources and few training providers. The ETPL performance reporting creates an administrative burden on its providers and deters them from

applying to the ETPL. Because training programs must be on the ETPL to receive WIOA funding, access to training opportunities is significantly limited to underrepresented populations. Vermont is fortunate to have state funding allocated to pay tuition for programs not on the ETPL. However, realize the importance of making the ETPL process and reporting more accessible for providers.

Training programs may be delivered as stackable services and can be provided in-person, online, or in a blended approach. This list is not all-inclusive, and additional training services not listed may be required to be on the ETPL. This multi-optional approach gives different age groups and learning styles to access training programs where they are.

Vermont has had conversations with other states that have successfully lessened the burden on its providers for reporting purposes. We intend to explore the methods learned from other states and work with our internal partners to offer the best solution for Vermont providers.

Future collaboration to leverage funding will occur with partner agencies that may not be held to the same ETPL requirements as VDOL for WIOA funding. For example, participants who are co-enrolled with HireAbility may receive funding for tuition for the course and funding for support from VDOL.

Providers are invited to attend monthly all-staff virtual meetings to discuss their training programs. This enhances the staff's knowledge to better inform their participants on desired training programs.

4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR FOR THE ADULT PRIORITY OF SERVICE REQUIREMENT IN WIOA SECTION 134 (C)(3)(E) THAT REQUIRES AMERICAN JOB CENTER STAFF, WHEN USING WIOA ADULT PROGRAM FUNDS TO PROVIDE INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES, TO GIVE PRIORITY OF SERVICE TO RECIPIENTS OF PUBLIC ASSISTANCE, LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT (INCLUDING ENGLISH LANGUAGE LEARNERS).

Priority of Service for career and training services funded by and provided through the adult WIOA program shall be given to recipients of public assistance, other low-income individuals, or individuals who are deficient in basic skills in accordance with the requirements of WIOA sec. 134(c)(3)(E). Priority of Service is managed and enforced through policy and procedures established to ensure services and funds are focused on addressing the employment & training needs of target populations.

The VDOL determines whether an individual meets the priority of service requirements through the initial assessment process. Approved assessment tools and minimum passing scores determine whether an individual is deficient in basic skills. An Administrative Bulletin is distributed to the VDOL staff annually, providing income guidelines to determine low income.

Regional Job Center Managers review all new enrollments and funding modifications to existing enrollments to confirm that policies and procedures are being complied with. In addition, an annual on-site monitoring visit is conducted by the program administrator. Leadership works closely with its fiscal department to ensure that funding for priority populations is complying.

Vermont has realized the importance of growing community partnerships at all levels to learn and emphasize each other's services and strengths and how, together, we can provide a more effective and seamless process for priority populations to access. Connecting with partners in

underrepresented communities will be a strong focus in the coming year. The VDOL will commit to two concepts: a “no wrong door approach” and “meeting Vermonters where they are at.” Job specialists are encouraged to increase their presence in communities, allow for virtual meetings, and have a physical, consistent presence where underrepresented populations are.

The VDOL sees an opportunity as the Federal exemptions have lifted and “Time Limits” have returned to grow its partnership with the ICAN program. Time-limited populations co-enrolled with WIOA and actively engaged with their employment plan will meet their work requirements. Each state region has identified an ICAN lead job specialist primarily supporting service coordination within the multi-agency ICAN partnership. The lead Job Specialist will support its regional VDOL team by acting as a point of contact to the ICAN partnership and providing technical assistance as they work with participants.

Vermont realizes that fostering a better alignment with key partners across job training and education programs is critical in coordinating a seamless and equitable service delivery system that connects individuals with high-quality job opportunities and employers. Cross-agency planning and training will promote a shared understanding of workforce needs in Vermont. Topics to explore may include a standard intake process, shared assessments, and co-case management.

Vermont’s priority of service policy will be reviewed within a year to ensure that eligibility and allowable activities are being maximized and are following the federal guidelines.

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

As a single-area state, the VDOL manages the adult and dislocated worker programs at the State level. The transfer of funds between the programs is not anticipated. Should the need arise, the VDOL would consult with the US DOL and provide appropriate documentation of the justification as necessary.

#### 6. DESCRIBE THE STATE’S POLICY ON WIOA AND TAA CO-ENROLLMENT AND WHETHER AND HOW OFTEN THIS POLICY IS DISSEMINATED TO THE LOCAL WORKFORCE DEVELOPMENT BOARDS AND REQUIRED ONE-STOP PARTNERS. TRADE ACT SEC. 239(F), SEC. 235, 20 CFR 618.325, 20 CFR 618.824(A)(3)(I).

The VDOL policy regarding WIOA and TAA co-enrollment is to encourage co-enrollments so that participants receive the maximum benefit of the two programs. Vermont is a single-area state. There has been limited TAA activity in recent years and staff receive technical support on the policy on an as needed basis.

#### 7. DESCRIBE THE STATE’S FORMAL STRATEGY TO ENSURE THAT WIOA AND TAA CO-ENROLLED PARTICIPANTS RECEIVE NECESSARY FUNDED BENEFITS AND SERVICES. TRADE ACT SEC. 239(F), SEC. 235, 20 CFR 618.816(C)

The final rule mandates the co-enrollment of TAA participants in the WIOA-DLW program (20 CFR Part 618). It must ensure the availability of a comprehensive array of services for trade-affected workers. A State must also make co-enrollment available to Trade-affected workers who are eligible for other One-Stop partner programs to ensure that all necessary and appropriate services, including supportive services, are available to the worker. Trade-affected

workers may choose to decline co-enrollment in WIOA; however, the State cannot deny such worker benefits or services under the TAA Program solely for declining co-enrollment in WIOA.

Most Trade-affected workers meet the eligibility criteria of a dislocated worker defined in WIOA section 3(15). In certain circumstances, such as a general announcement of a closure, partially separated workers and adversely affected incumbent workers may meet the eligibility criteria as a dislocated worker under WIOA and must also be co-enrolled. TAA does not have a selective service compliance requirement; therefore, TAA participants who do not meet the Selective Service registration requirement will be exempt from the DW co-enrollment requirement. Both TAA and DW participants must be authorized to work in the United States.

**8. DESCRIBE THE STATE'S PROCESS FOR FAMILIARIZING ONE-STOP STAFF WITH THE TAA PROGRAM. 20 CFR 618.804(J), 20 CFR 618.305**

A limited number of staff manages the program; however, information about the program is included in staff on-boarding. Documentation is provided for reference at a later time. The TAA coordinator is available to consult with regional job center managers and job center specialists when the need arises. Finally, VJL has eligibility screening questions that help staff determine if a person is eligible for TAA.

**C. YOUTH PROGRAM REQUIREMENTS.**

With respect to youth workforce investment activities authorized in section 129 of WIOA, States should describe their strategies that will support the implementation of youth activities under WIOA. State's must-

**1. IDENTIFY THE STATE-DEVELOPED CRITERIA TO BE USED BY LOCAL BOARDS IN AWARDING GRANTS OR CONTRACTS FOR YOUTH WORKFORCE INVESTMENT ACTIVITIES AND DESCRIBE HOW THE LOCAL BOARDS WILL TAKE INTO CONSIDERATION THE ABILITY OF THE PROVIDERS TO MEET PERFORMANCE ACCOUNTABILITY MEASURES BASED ON PRIMARY INDICATORS OF PERFORMANCE FOR THE YOUTH PROGRAM AS DESCRIBED IN SECTION 116(B)(2)(A)(II) OF WIOA.<sup>11</sup> FURTHER, INCLUDE A DESCRIPTION OF HOW THE STATE ASSISTS LOCAL AREAS IN DETERMINING WHETHER TO CONTRACT FOR SERVICES OR TO PROVIDE SOME OR ALL OF THE PROGRAM ELEMENTS DIRECTLY.**

<sup>11</sup> Sec. 102(b)(2)(D)(i)(V)

As a single-area state, Vermont does not subaward youth funding to local areas. The VDOL receives all the youth program funding and works with its twelve American Job Centers to deliver services to youth and employers at the local level.

The VDOL occasionally solicits proposals for grants or contracts from One-Stop or community partners to carry out activities or services using youth program funding. On these occasions, the VDOL follows the State's procurement and contracting policy for grant issuance and monitoring, as defined in the Agency of Administration Bulletins 3.5 and 5. All contractors and grantees are required to follow both state and federal requirements. Additionally, the VDOL requires all youth program activities not performed by the VDOL to be closely coordinated with the youth job specialists, regional managers, and the youth program administrator. This coordination ensures the performance is being measured and opportunities are leveraging one another to maximize One-Stop partner involvement.



The VDOL has adopted a "no-wrong-door" approach to youth workforce development, including priorities for advancing equity, ensuring job quality, addressing mental health and other barriers, and elevating youth voices. The VDOL strives to offer seamless access to resources, program elements, and wraparound services to the most vulnerable youth. It has expanded its outreach efforts to meet youth where they are by positioning staff in underserved communities where these youth reside. This allows equitable and easy access to underrepresented youth.

The VDOL's commitment to youth development is exemplified by a conscious and professional reliance on youth development principles, including high expectations, caring relationships, and holistic service strategies that build responsibility and identity. A key strategy in this area is providing adult mentors for every youth participant, integrating social and support services into programming, addressing barriers to youth access, accommodating a variety of learning styles, and providing follow-up services for young people when they exit to ensure their continued success. Adult mentoring may come in several different forms, including job specialists, supervisors, and partner staff. Mentors inspire and motivate youth.

The youth program emphasizes developing skills, knowledge, and competencies that lead to good jobs and careers. Assessments and Individual Service Strategies are developed with youth and strongly link work, learning, and academic and occupational learning to career pathways identified by the youth in their plan. All Dropout Recovery (out-of-school youth) programs must provide occupational skills training concurrently with work readiness and academic training. Key strategies in this area are linkages to registered apprenticeships, community colleges and employers, transition services, and how participants will gain academic credit and skill credentials.

It is critical to the success of youth participating in the program to have a strong involvement of local employers willing to mentor them through work experience. Although Vermont does its utmost to link youth to local labor market needs and growing economic sectors as determined by the occupations in-demand list for Vermont, it isn't always the case. Work experiences are designed to allow youth to explore their interests while developing soft skills and basic work skills. To qualify for this work experience is matched to interests, which may not be a high-demand occupation.

Quality partnerships are essential to address and refocus local, regional, and state-specific challenges and solutions, including strategies to improve the youth workforce system, elevate youth voice, and close equity gaps. The VDOL is committed to developing genuine partnerships among educational institutions, employers, community-based organizations, private sector employers, and/or other organizations and members of the community interested in youth. Job Center Specialists are encouraged to access resources from these partnerships and use them in the program to provide quality youth opportunities.

Primarily, support services are made available to youth to provide the resources necessary to enable their participation in the youth program while reducing barriers and meeting their basic needs. Vermont's support service policy will be reviewed within the next year to ensure that all support services allowable under federal guidance are captured and spending limits are appropriate.

The VDOL youth program supports young people in gaining the skills to complete high school or its equivalent and transition to postsecondary education, advanced training, or good jobs. The youth program creates opportunities for youth to see the world outside their limited sphere.

A maximum of 25% of the funds allocated to Vermont is allowed to be expended on In-School Youth activities. Because schools have been more intentional and proactive at keeping kids in school over the last several years, the demand for career, individualized, and training services for in-school youth has increased. Schools have provided valuable feedback to leadership that a VDOL presence in their schools has been a critical option for students to experience.

Positioning Job Center Specialists in schools cultivates solid and reliable relationships with students so they have an immediate connection to support with training and career exploration after graduation. The VDOL works closely with guidance counselors and administrators to deliver basic career services to individuals and groups of students. The VDOL is actively involved in a financial reality fair for juniors and seniors in one state region. The event is based on VT LMI wage data and allows students to "test drive" career interests and income. In addition, students learn how to manage their living expenses on a monthly budget. Because of the impactful feedback the VDOL received for this event over the next several years, the VDOL would like to bring this event to other regions of the state.

There has also been an increased effort to participate in career exploration with middle school students by attending career fairs.

Shared Youth Vision:

**VISION/MISSION OF VT INTERAGENCY AFTERSCHOOL YOUTH TASK FORCE (Now Afterschool Advisory Council):**

(Executive Order 08-21) Building on the work of the Universal After School Task Force and the Summer Matters campaign, the Task Force shall work toward a statewide system offering universal access to safe, enriching, and comprehensive options for afterschool and summer programming for Vermont youth from pre-kindergarten to grade 12. The system shall encourage participants' academic, social, and emotional development in safe, accessible environments where they can connect with peers and adults. Programs shall represent a range of school-based, private, and community partnerships. They should be available to all interested youth and families at reasonable or no cost, emphasizing ensuring Vermont's most vulnerable students have ready access to affordable opportunities.

**YOUTH EMPLOYMENT SUBCOMMITTEE:**

**PURPOSE:** Build workforce skills, financial wellness, and career awareness through Universal Afterschool and Summer expansion efforts by creating meaningful and supportive job experiences for older youth, including traditionally marginalized groups (e.g., BIPOC, LGBTQ, low-income, rural, and individuals with disabilities).

Members from several state organizations include HireAbility, Fish and Wildlife, Agency of Commerce and Community Development, Vermont Afterschool, Department of Labor, and members of Vermont's Congressional Delegation.

Vermont realizes that feedback is critical to the continuous improvement of the youth program. The program must offer follow-up services to all youth who exit the program for up to 12 months after exit. Although a requirement, this tends to be a challenge in keeping youth engaged with job specialists after exiting the program.

An important component of youth engagement and continuous improvement is creating opportunities for youth to express themselves, voice their ideas, and provide input for projects or programs. Youth voice is the idea that young people have a voice in society, can bring about change, and represent their interests and desires. It is critical for youth to be heard. Vermont will expand its youth voice initiative to enhance youth voice. Inviting youth to partake in program development, marketing, and technology enhancements are just a few areas that will empower a youth voice initiative. Vermont realizes that youth can provide critical insights and recommend strategies to improve outreach, recruitment, and other service delivery strategies. This is new territory for the VDOL; therefore, an intentional outreach to other states to explore youth voice initiatives will occur within the following year.

Workforce development staff play a critical role in supporting youth with barriers through assessments, comprehensive guidance, and counseling, including referrals to partner organizations and providing sufficient supportive services to alleviate additional barriers to education and work. Job Specialists must be confident and well-versed to provide the support youth need when navigating their challenges. Vermont realizes that providing professional development opportunities to staff increases their confidence and credibility with the youth participants they serve and the community partners they collaborate with. Vermont also realizes that integrated training sessions with its core partners can be highly effective and valuable. Within the following year, workforce development will conduct employee focus evaluations or focus groups to encourage honest and open feedback. Based on the evaluation results, the VDOL will pursue external training to help staff develop.

There will be a heightened emphasis on collaboration and alignment at all levels to ensure a streamlined and coordinated service delivery system for youth with barriers to employment, including youth with disabilities. This initiative will include outreach to key community organizations that have deep roots in underserved communities, Title II AEFLA, Title IV VR, and Job Corps Centers. In addition, workforce development hopes to coordinate cross-agency professional development opportunities that will bring agencies together to satisfy common training needs and align youth systems.

The WIOA Title I Youth Program (Youth Program) provides a comprehensive array of high-quality services to youth with barriers to employment, focusing on supporting educational and career success. Vermont's Youth Program engages community partners and employers to form a network of support services for youth that VDOL job specialists can offer participants as program elements.

Job Center Specialists are required to make the 14 program elements available to all Youth Program participants. Youth participants are not required to receive all services, but elements deemed appropriate and desirable must be provided to assist in removing employment and training barriers and obtaining short- and long-term goals. Job specialists may refer clients to a partner provider to deliver one of the services rather than providing the service directly (e.g., education, leadership, financial training, etc.) When participants access one of the 14 elements from an entity other than VDOL, it is made clear to the provider and the participant that the

service is part of their Individual Service Strategy (ISS), communication strategies concerning the support and outcomes of the service will be identified, and the service details will be clearly documented.

An online program element resource library is being built to ensure easy and equitable access for youth. The library will contain regional and statewide information, tools, and links. A successful program offered in the Northeast Kingdom of Vermont may be accessible to the southern region of Vermont. The program element resource library should be completed within the following year.

#### 14 Youth Program Elements

1. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.
2. Alternative secondary school services or dropout recovery services, as appropriate.
3. Paid and unpaid work experiences that have as a component of academic and occupational education, which may include—
  - a. Summer employment opportunities and other employment opportunities are available throughout the school year;
  - b. Internships and job shadowing; and
  - c. On-the-job training opportunities;
  - d. Summer employment opportunities and other employment opportunities are available throughout the school year;
  - e. Internships and job shadowing.
4. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
5. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate;
6. Supportive services;
7. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;
8. Follow-up services for not less than 12 months after the completion of participation;
9. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate;
10. Financial literacy education;
11. Entrepreneurial skills training;

12. Services that provide 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
13. Activities that help youth prepare for and transition to postsecondary education and training.
14. Education is offered concurrently with and in the same context as workforce preparation activities and training for a specific occupational cluster.

2. EXPLAIN HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN ACHIEVING EQUITABLE RESULTS FOR OUT-OF-SCHOOL AND IN-SCHOOL YOUTH. DESCRIBE PROMISING PRACTICES OR PARTNERSHIP MODELS THAT LOCAL AREAS ARE IMPLEMENTING AND THE STATE'S ROLE IN SUPPORTING AND SCALING THOSE MODELS WITHIN THE STATE FOR BOTH IN-SCHOOL AND OUT-OF-SCHOOL YOUTH.

Vermont operates as a single-area state. The VDOL is committed to keeping youth engaged in high school, helping them reach their training and employment goals, and arming them with the information they need to make informed decisions about future education and employment opportunities. VDOL relies on reports from the Agency of Education, Vermont Student Assistance Corporations, and other entities that survey students to help inform policy.

Every two years, VSAC surveys all high school seniors. Based on the survey trends from the Vermont class of 2022, the assistance and expertise of the VDOL staff have become increasingly important. Trends the data demonstrated are as follows:

- A significant decline overall in students' intentions to pursue additional training or education after high school compared to prior years.
- A widening of the gap in aspiration by both gender and parent education attainment since 2018
- A decline in the percentage of students reporting that their parents wished for them to continue their education. This decline differs by gender and parent educational attainment.

The data analyses also showed the effects of the COVID-19 pandemic on students' perceptions of their learning and, for at least some students, their postsecondary plans.

To emphasize and support the goal of keeping youth in school, the VDOL will request an ISY waiver to request, within the next year, a 50% ISY and 50% out-of-school youth split. This would allow the VDOL job specialists the time they need to develop real relationships with the youth and work alongside school staff to explore innovative ways to keep them engaged in school.

To maximize enrollments and allowable activities for the WIOA youth program, the VDOL will thoroughly review its youth policies and procedures. Vermont realizes that permissible activities that will significantly impact a youth's journey and success while in the program are not being utilized. A youth incentive policy is just one example of this. They are intended to encourage and motivate WIOA youth to reach specific goals and obtain favorable outcomes.

Another example and high-priority policy/procedure review will be the follow-up services policy. Vermont plans to develop and implement an innovative approach to receiving feedback from youth after they exit the program. Lastly, the recently released TEGL 03-23 Allowable Uses of Funds for Outreach Activities for Federal Formula and Competitive Grant Awards provides intriguing opportunities that Vermont will explore within the following year.

The VDOL will work with their federal project officer to establish a connection with other states that have demonstrated good policies and procedures that could potentially be replicated or adapted to Vermont.

3. DESCRIBE HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN IMPLEMENTING INNOVATIVE MODELS FOR DELIVERING YOUTH WORKFORCE INVESTMENT ACTIVITIES, INCLUDING EFFECTIVE WAYS LOCAL WORKFORCE BOARDS CAN MAKE AVAILABLE THE 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2); AND EXPLAIN HOW LOCAL AREAS CAN ENSURE WORK EXPERIENCE, INCLUDING QUALITY PRE-APPRENTICESHIP AND REGISTERED APPRENTICESHIP, IS PRIORITIZED AS A KEY ELEMENT WITHIN A BROADER CAREER PATHWAYS STRATEGY.

Vermont operates as a single-area state. VDOL's regional offices, working as part of the American Job Center network, meet regularly with or are on advisory boards for the state's regional CTE centers. These connections serve as a necessary connection between VDOL and those entities who are engaged in youth workforce investment activities.

With every youth we meet with, we review the 14 program elements with them. The 14 program elements is the foundation or framework for the youth's individual service strategy (ISS). The 14 program elements are accessed through VDOL or other partner agencies through a referral process. The VDOL staff ensures that youth have the wrap around services they need to successfully complete their ISS. The VDOL is in the process of building a statewide program element library for youth to access virtually elements that they may not have access too. For example, a youth that lives in the Northeast Kingdom that is in need of formal adult mentoring, but isn't offered in their region, may be able to access on online adult mentoring from a Burlington mentoring program.

VDOL Regional teams actively meet with partners, including CTE centers to brainstorm, create and implement innovative models. Vermont has 17 regional CTE centers and our regional managers or staff generally serve on, or at least attend the regional advisory boards for the CTE centers.

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.

An administrative memo was issued on February 22, 2019, to provide guidance on the definition of the "needs additional assistance" eligibility criterion. It is the practice of the VDOL youth program to serve the most at-risk youth of Vermont by providing 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.

In-School Youth (ISY) ages 14-21 who meet the low-income marker but do not have a specified at-risk eligibility factor as determined under WIOA § 129(a)(1)(B) may be served as an at-risk youth if they are determined by NAA to complete an educational program or to secure or hold employment. No more than 5 % of the ISY newly enrolled in a given program year may be eligible based on the NAA criterion. If the individual needs additional assistance, a request for approval must be submitted to the Grant Manager before enrollment and after the Regional Manager has reviewed the file and supported enrollment. The request for approval form (5% NAA funding) can be found in the Workforce Development (WFD) forms folder.

Out-of-School Youth (OSY) ages 16-24 who do not have a specified at-risk eligibility factor as determined under WIOA § 129(a)(1)(C) may be served as an at-risk youth if they are determined to NAA to complete an educational program or to secure or hold employment. 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.

An individual who needs additional assistance to overcome barriers to completing an educational program or securing or holding employment will qualify for WIOA services if determined eligible under the NAA definition. At least one of the barriers listed below must be met:

- A child of an incarcerated parent within the past five years
- Youth who have experienced recent traumatic events, are victims of abuse, or reside in an abusive environment
- Youth who has been referred to or is being treated by an agency for substance abuse or addiction issue
- History of mental illness
- Experienced harassment or victim of bullying
- Youth who is emancipated or in the process of becoming emancipated
- A high school graduate or GED recipient who has not held a full-time regular job for more than three consecutive months and lacks the work readiness skills necessary to obtain and retain substantial employment
- A youth involved in gang activity
- Youth who are residing with family members with substance abuse or addiction issues

#### D. SINGLE-AREA STATE REQUIREMENTS

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information

required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must include—

1. ANY COMMENTS FROM THE PUBLIC COMMENT PERIOD THAT REPRESENT DISAGREEMENT WITH THE PLAN. (WIOA SECTION 108(D)(3).)
2. THE ENTITY RESPONSIBLE FOR THE DISBURSAL OF GRANT FUNDS, AS DETERMINED BY THE GOVERNOR, IF DIFFERENT FROM THAT FOR THE STATE. (WIOA SECTION 108(B)(15).)
3. A DESCRIPTION OF THE TYPE AND AVAILABILITY OF WIOA TITLE I YOUTH ACTIVITIES AND SUCCESSFUL MODELS, INCLUDING FOR YOUTH WITH DISABILITIES. (WIOA SECTION 108(B)(9).)

1. Vermont's draft state plan was available for comment from January 26, 2024, to February 20, 2024, through the State Workforce Development Board's website and the Vermont Department of Labor's website.

No comments were received.

2. There are no other entities.

3. The WIOA Title I Youth Program (Youth Program) provides a comprehensive array of high-quality services to youth with barriers to employment, with a special focus on supporting educational and career success. Vermont's Youth Program engages community partners and employers to form a network of support services for youth that VDOL job specialists can offer participants as program elements.

Job Center Specialists are required to make the 14 program elements available to all Youth Program participants. Youth participants are not required to receive all services, but elements deemed appropriate and desirable must be provided to assist in removing employment and training barriers and obtaining short- and long-term goals. Job specialists may refer clients to a partner provider to deliver one of the services rather than providing the service directly (e.g., education, leadership, financial training, etc.) When participants access one of the 14 elements from an entity other than VDOL, it is made clear to the provider and the participant that the service is part of their Individual Service Strategy (ISS), communication strategies concerning the support and outcomes of the service will be identified, and the service details will be clearly documented.

To ensure easy and equitable access for youth, an online program element resource library is being built. The library will contain information, tools, and links both regionally and statewide. A successful program that is being offered in the Northeast Kingdom of Vermont may be accessible to the southern region of Vermont. The program element resource library should be completed within the next year.

#### **14 Youth Program Elements**

1. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential;



2. Alternative secondary school services or dropout recovery services, as appropriate;
3. Paid and unpaid work experiences that have as a component of academic and occupational education, which may include—
  - a. Summer employment opportunities and other employment opportunities available throughout the school year;
  - b. Internships and job shadowing; and
  - c. On-the-job training opportunities;
  - d. Summer employment opportunities and other employment opportunities available throughout the school year;
  - e. Internships and job shadowing.
4. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
5. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate;
6. Supportive services;
7. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;
8. Follow-up services for not less than 12 months after the completion of participation;
9. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate;
10. Financial literacy education;
11. Entrepreneurial skills training;
12. Services that provide 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
13. Activities that help youth prepare for and transition to postsecondary education and training.
14. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupational cluster.

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

The One-Stop MOU exists between the following partners and expires on June 30, 2025:

Vermont’s State Workforce Development Board (“SWDB”); the Vermont Department of Labor (“VDOL”); Northlands Job Corps; 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 (DBA Associates for Training and Development, “A4TD”); PathStone; Maquam Bay of the Missisquoi, Inc.; and the community action agencies: Champlain Valley Office of Economic Opportunity (“CVOEO”), BROCC Community Action (BROC), Capstone Community Action, Northeast Kingdom Community Action (NEKCA), and Southeastern Vermont Community Action (SEVCA), 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 the 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 signed as additional partners without the obligation to contribute funding under section VI of this agreement.

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 its 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. The cost-sharing responsibility agreed upon by partners is described below.

### **Allocation Methodology**

Partners have agreed to share the operating costs of the shared space in the state’s only comprehensive One Stop location at 63 Pearl Street, Burlington, VT, 05401. The infrastructure costs of the total building were established prior to the negotiation process, as well as the square footage of shared space in the One Stop (computer room, conference room, elevator, etc.). Shared space occupies 15.95% of the building’s total square footage, so 15.95% of the building’s total operating costs will be allocated equally among the 20 partners contributing in this state.

In continued pursuit of a sustainable and effective “digital footprint” that facilitates remote/virtual access to the One Stop system, Vermont’s One Stop Partners also wish to acknowledge the costs of “virtual infrastructure” through which customers (job seekers and businesses) access services without being in person at any One Stop location. For this reason, the One Stop Operator will determine a reasonable way to track virtual service delivery costs and endeavor to gather that information over the course of the next year. Partners will be cognizant of this intent and may choose to implement accounting systems to allow for this cost reporting or design a methodology to estimate these costs.

### **Shared Costs**

The MOU identifies the costs that will be shared by the Burlington AJC required partners: they are infrastructure costs that will be billed proportionally to required partner programs and other co-located programs on a quarterly basis. The total amount assessed to programs for the shared One Stops space will not exceed 15.95 percent of the total proportional amount budgeted for the Burlington AJC.

Partners agree that no additional Shared Services or Additional Cost expenditures will be allocated among partners at this time.

### **Quarterly Assessments**

Partners will receive quarterly invoices from the state business office. Because there are 20 partner programs sharing costs, each program will be assessed 1/20 of the actual expenses in the categories identified in the budget, with a cap of \$1,180.66 annually. No partner program will be billed in excess of \$1,180.66 per year, even if expenditures exceed budgeted amounts.

### **In-Kind Contributions**

If partners cannot pay their portion of the shared costs (a maximum of \$1,180.66 per year), they can notify the SWDB that they would prefer to make an in-kind contribution in lieu of cash. The SWDB can then convene partners and, in not more than 2 meetings, address petitions to accept in-kind contributions. If partners agree to accept, amendments to this MOU reflecting that change may be developed.

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

Granting and contracting are subject to State of Vermont Administrative Procedures, specifically Agency of Administration Bulletins 3.5 and 5, and other administrative procedures approved by the Administration, and must follow VDOL's Approved Granting Plan.

From Bulletin 5 (for grants) - Unless prohibited by statute or regulation, and prior to the issuance of a grant award, State of Vermont granting agencies must determine if each potential grantee is eligible to receive an award and shall not issue an award to an ineligible organization. In addition, Uniform Guidance, §200.205(b), requires Federal agencies to review risk imposed by applicants prior to issuance of new competitive grants and cooperative agreements; the State of Vermont has adopted similar requirements for grant awards it issues, regardless of funding source. These requirements are applicable to all classifications of grants.

From Bulletin 3.5 (procurement & contracting procedures), Section 8.1 addresses requirements for competition in bidding: "Competition in the procurement process serves both State Agencies/Departments and potential bidders by ensuring the procurement process produces an optimal solution at a reasonable price and allowing qualified Suppliers an opportunity to obtain State business. In addition to complying with existing statutory and regulatory requirements, State procurements shall comply with the following general principles: (a) Notice: Provide appropriate notice of opportunities to compete for State business; (b) Predictability: Provide a consistent process while conducting the procurement; (c) Transparency: Document the procurement process clearly and consistently; and (d) Cost-effectiveness: Ensure procurement processes are designed to secure optimal solutions at reasonable prices. Although Vermont does not have a statute, rule, or administrative requirement that mandates preference be given to State residents or products, all other considerations being equal, preference will be given to resident bidders of the State and/or products raised or manufactured in the State. "

VDOL's Approved Granting Plan does not address competitive processes for subgrants or contracts, but defers to state Bulletin's mentioned above.

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.

The VDOL will continue to offer paid On-the-Job Training for eligible participants. Referenced throughout this plan, Vermont plans to expand the role of On-the-Job Training as a key aspect of its workforce development strategy over the next four years. Staff training, mentoring, and support, along with building out systems to ensure employers are aware of options for supported On-the-Job Training options. Vermont also plans to review and update its policies related to individual training accounts.

Over the next four years, Vermont plans to improve aspects of the Eligible Training Provider approval and reporting processes while ensuring the public can access valuable training provider outcomes information through an easy-to-use website that provides relevant information.

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 Board, working closely with the Vermont Department of Labor for Title I and through the activities of the One-Stop Operator, will convene quarterly meetings to review program-specific data, including for Title II, to ensure proper coordination and co-enrollments between the two programs. The Agency of Education will, as outlined earlier in this plan, rely on the Agency of Education to conduct the public application process and awarding process because the Agency of Education receives the funds directly and serves as the grantor.

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.

See attached documents for the WIOA One-Stop MOU.

E. WAIVER REQUESTS (OPTIONAL)

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

1. IDENTIFIES THE STATUTORY OR REGULATORY REQUIREMENTS FOR WHICH A WAIVER IS REQUESTED AND THE GOALS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, INTENDS TO ACHIEVE AS A RESULT OF THE WAIVER AND HOW THOSE GOALS RELATE TO THE UNIFIED OR COMBINED STATE PLAN;

2. DESCRIBES THE ACTIONS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, HAS UNDERTAKEN TO REMOVE STATE OR LOCAL STATUTORY OR REGULATORY BARRIERS;

3. DESCRIBES THE GOALS OF THE WAIVER AND THE EXPECTED PROGRAMMATIC OUTCOMES IF THE REQUEST IS GRANTED;
4. DESCRIBES HOW THE WAIVER WILL ALIGN WITH THE DEPARTMENT'S POLICY PRIORITIES, SUCH AS:
  - A. SUPPORTING EMPLOYER ENGAGEMENT;
  - B. CONNECTING EDUCATION AND TRAINING STRATEGIES;
  - C. SUPPORTING WORK-BASED LEARNING;
  - D. IMPROVING JOB AND CAREER RESULTS, AND
  - E. OTHER GUIDANCE ISSUED BY THE DEPARTMENT.
5. DESCRIBES THE INDIVIDUALS AFFECTED BY THE WAIVER, INCLUDING HOW THE WAIVER WILL IMPACT SERVICES FOR DISADVANTAGED POPULATIONS OR INDIVIDUALS WITH MULTIPLE BARRIERS TO EMPLOYMENT; AND
6. DESCRIBES THE PROCESSES USED TO:
  - A. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;
  - B. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;
  - C. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;
  - D. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.
  - E. COLLECT AND REPORT INFORMATION ABOUT WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT.
7. THE MOST RECENT DATA AVAILABLE REGARDING THE RESULTS AND OUTCOMES OBSERVED THROUGH IMPLEMENTATION OF THE EXISTING WAIVER, IN CASES WHERE THE STATE SEEKS RENEWAL OF A PREVIOUSLY APPROVED WAIVER.

The VDOL is not currently requesting a waiver, but reserves the right to request a waiver(s) during the period of this plan.

TITLE I-B ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	Yes

The State Plan must include	Include
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;	No
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);	No
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	No
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	No
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	Yes

The State Plan must include	Include
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;	
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	Yes

**ADULT PROGRAM PERFORMANCE INDICATORS**

**Performance Goals for the Core Programs**

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

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

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

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

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

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

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

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

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

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

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

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

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



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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	70.0%	70.0%	71.0%	71.0%
Employment (Fourth Quarter After Exit)	61.0%	64.5%	62.0%	65.0%
Median Earnings (Second Quarter After Exit)	\$5,835	\$7750	\$5,925	\$8000
Credential Attainment Rate	66.0%	66.0%	66.5%	66.5%
Measurable Skill Gains	57.0%	57.0%	58.0%	58.0%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

#### DISLOCATED PROGRAM PERFORMANCE INDICATORS

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

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

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not

propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

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

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

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

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

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

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

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

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data

reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

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

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	76.0%		76.5%	
Employment (Fourth Quarter After Exit)	70.0%		70.5%	
Median Earnings (Second Quarter After Exit)	\$9,350		\$9,357	
Credential Attainment Rate	76.0%		76.5%	
Measurable Skill Gains	63.0%		63.5%	
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

## YOUTH PROGRAM PERFORMANCE INDICATORS

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

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

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

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

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

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

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

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

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

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

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

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

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	64.0%		64.5%	

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Fourth Quarter After Exit)	61.0%		61.5%	
Median Earnings (Second Quarter After Exit)	\$4,050		\$4,131	
Credential Attainment Rate	42.0%		42.5%	
Measurable Skill Gains	43.0%		44.0%	
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

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*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

#### PROGRAM-SPECIFIC REQUIREMENTS FOR WAGNER-PEYSER PROGRAM (EMPLOYMENT SERVICES)

All Program-Specific Requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

##### A. EMPLOYMENT SERVICE STAFF

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

Wagner Peyser (WP) services are delivered to Vermonters via a trained Job Center Specialist. There are two tiers: Job Center Specialist I (JCS I) and Job Center Specialist II (JCS II). Staff fulfilling the Job Center Specialist I roles are well versed in the Wagner Peyser Act services and offer telephonic, virtual, and in-person triage services followed by referrals to partner and community programs.

Basic career services are the primary focus of the JCS I – resume writing, application assistance and submittal, and job search. Job Center Specialist II provides intensive case management services of the Wagner Peyser Act specializing in WIOA Adult/Youth, Apprenticeship, ICAN, and JVSG, in addition to conducting joint case management with core and community partners to ensure intensive services and supports are identified, documented, and drafted on each person's individualized employment or intensive service plan. Also, it is important to note that all JCS II staff can conduct JCS I duties.

The VDOL will staff the provision of labor exchange services under the Wagner-Peyser Act with employees of the State of Vermont, Vermont Department of Labor, and Workforce Development Division. Staff will be in the state's comprehensive One-Stop AJC and regional offices throughout the state, co-located with other WIOA Title I staff.

Workforce Instruction for Service Excellence (WISE) is an onboarding training program launched last year. The WISE training curriculum was developed to support the VDOL's purpose and principles. The VDOL recognized the importance of providing the tools and insights for staff to perform their job better and more effectively. The WISE training consisted of five full in-person sessions for all new employees. Staff were asked to complete pre-requisite work, including an Introduction to the Vermont Workforces System, customer services videos, attend a resume and interview workshop, and complete Vermont JobLink training. The curriculum included professional communications, customer experience, unconscious bias, de-escalation, career services overview, WIOA, measurable skills, and credentials. The interactive WISE training challenged new staff to step out of their comfort zone. Different methods were used to present material, including guest speakers, individual and group activities, and lectures. Regional Managers brought their experience and expectations to the WISE training, which proved impactful. Job Specialists were given case scenarios they worked through with a Regional Manager mentor. On day five, the Job Specialists presented their cases to a Regional Manager before the class. At the end of each day, a survey was sent to the attendees for feedback. Twenty new employees received the training last year. Lack of capacity and high-priority tasks for leadership have caused the WISE training to be put on hold. The leadership intends to explore options to make this training sustainable and be offered to all new staff.

## 2. DESCRIBE HOW THE STATE WILL UTILIZE PROFESSIONAL DEVELOPMENT ACTIVITIES FOR EMPLOYMENT SERVICE STAFF TO ENSURE STAFF IS ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS

Once an AJC staff position is accepted, the new employee begins the onboarding process. In 2023, VDOL's WFD team has done significant work to update and improve their onboarding efforts. WISE training is offered to each new staff member, including a five-session lecture and learning series. Program Administrators and regional management team members lead the new employees through interactive learning sessions on WP, WIOA, and internal and external core partner programs. Mentorship training is also practiced and has proven to be a successful technique. Professional development is offered throughout the year and can be identified via department management, program administrators, Commissioner, NASWA, NVTI, or other entities.

Leadership will also explore training needs through in-person employee evaluations or employee groups to understand training needs. With the increasing demand for staff working with individuals with barriers, the VDOL realizes the importance of providing staff with the training, tools, and resources they need to be successful and effective in their jobs.

### 3. DESCRIBE STRATEGIES DEVELOPED TO SUPPORT TRAINING AND AWARENESS ACROSS CORE PROGRAMS AND THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING PROVIDED FOR EMPLOYMENT SERVICES AND WIOA STAFF ON IDENTIFICATION OF UI ELIGIBILITY ISSUES AND REFERRAL TO UI STAFF FOR ADJUDICATION

WFD and UI consistently seek to identify strategies in which services from both divisions can best support job seekers and employers. Collaboration is frequent because UI and WFD services are intertwined, and boundary identification is essential. WFD supports individuals who utilize equipment in the AJC to file weekly claims, but they cannot answer any specific questions on a person's case. Relationships with crucial UI personnel have been identified, and these individuals are available to assist AJC staff with claimant questions.

All WFD staff are trained in the services of the RESEA program, the services of WP, and core partner programs.

In July 2023, Vermont experienced extensive flooding in many regions. WFD was asked to support Disaster Relief Centers placed throughout the state. It was quickly identified that impacted persons were not at a point where they needed job search support but needed to file for UI. Staff were quickly able to identify key members of each team who were able to problem-solve with the claimant.

As we look to the future, WFD and UI will seek to continue sharing information from the field and develop training to support both departments.

#### 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

At all Vermont Department of Labor (VDOL) American Job Centers (AJCs), we provide dedicated in-person support to individuals seeking assistance with their Unemployment Insurance (UI) claims. Our AJCs are equipped with resources such as computers, telephones, and scan/fax machines, ensuring claimants have the tools they need to file their claims efficiently.

When utilizing in-person services or interpreter services, our trained AJC team members are ready to provide detailed explanations of UI information to the claimants. This direct support often leads to quicker resolutions, allowing individuals to navigate the process more effectively. Additionally, all AJC locations across the state offer job search support and assistance with application submission to further support UI filing.

For those who prefer phone conversations, support is also available, although it may not match the depth of in-person services. In such cases, our AJC team members frequently schedule face-to-face meetings to provide the next level of personalized support, ensuring that individuals receive the assistance they need throughout the UI filing process. We are committed to making the experience as accessible and supportive as possible for all individuals seeking assistance.

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

At the Vermont Department of Labor (VDOL), our strategy to provide ongoing reemployment assistance to Unemployment Insurance (UI) claimants and other unemployed individuals begins



by showcasing the services and offerings available through the Wagner Peyser program at the American Job Center (AJC). These services, available virtually and in person, encompass essential elements such as resume building, job matching, interviewing techniques, workshops, and referrals to core and community partners.

Every willing individual and UI recipient is encouraged to create a Vermont Job Link (VJL) account to get started. This account is a hub for posting resumes and allows employers with vetted accounts to review them. All services provided are meticulously documented in VJL, enabling us to track progress within the department and collaborate with partners through data-sharing agreements.

For individuals enrolled in the Reemployment Services and Eligibility Assessment (RESEA) program, direct contact is maintained with their UI coordinator. These coordinators are seamlessly integrated within the AJC offices, offering additional support throughout reemployment. Our goal is to make the journey back to employment as straightforward and beneficial as possible, and our team is here to guide and assist every step of the way.

**D. DESCRIBE HOW THE STATE WILL USE W-P FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN W-P AND UI, AS APPROPRIATE INCLUDING THE FOLLOWING:**

**1. COORDINATION OF AND PROVISION OF LABOR EXCHANGE SERVICES FOR UI CLAIMANTS AS REQUIRED BY THE WAGNER-PEYSER ACT;**

Wagner Peyser services are offered to all UI claimants. Claimants can access services through in-person and virtual services. All UI claimants are directed to create a Vermont Job Link (VJL) account. VJL accounts are designed to offer claimants the ability to job search, and all vetted employers can search for potential future employees via a resume search. RESEA staff members are co-located in American Job Centers, offering selected individuals with mandatory intensive services.

Recruitment for the department is conducted through Vermont's HR system (VTHR). WFD staff work closely with their assigned HR representative to ensure accurate job specifications and descriptions. Advertising is conducted on VTHR's website and local media outlets. Local management assembles a well-versed panel, including internal and external department members. A scripted process is followed and documented throughout the VTHR system.

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

Wagner Peyser Act funds are utilized via UI claimants and businesses in the following ways:

At Vermont Department of Labor (VDOL) American Job Centers (AJCs), we offer personalized in-person support for individuals navigating Unemployment Insurance (UI) claims. Our AJCs are well-equipped with resources like computers, phones, and scan/fax machines, ensuring claimants have the tools for efficient claim filing.

- When using in-person or interpreter services, our trained AJC team members provide detailed explanations of UI information, leading to quicker resolutions. Job search support and assistance with application submission are also available at all AJC locations across the state.

- For those preferring phone support, though not as extensive as in-person services, our AJC team often schedules face-to-face meetings to provide more personalized assistance. We are committed to making the UI filing experience accessible and supportive for everyone.

Wagner Peyser services are offered to Vermont employers. Any employer can create a VJL account. Once vetted and approved, the employer can conduct a resume search seeking an individual whose resume highlights the skill set being sought.

### 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

At Vermont Department of Labor (VDOL) American Job Centers (AJCs), we offer personalized in-person support for individuals navigating Unemployment Insurance (UI) claims. Our AJCs are well-equipped with resources like computers, phones, and scan/fax machines, ensuring claimants have the tools for efficient claim filing. When using in-person or interpreter services, our trained AJC team members provide detailed explanations of UI information, leading to quicker resolutions. Job search support and assistance with application submission are also available at all AJC locations across the state. For those preferring phone support, though not as extensive as in-person services, our AJC team often schedules face-to-face meetings to provide more personalized assistance. We are committed to making the UI filing experience accessible and supportive for everyone.

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

At VDOL, our strategy for ongoing reemployment assistance to UI claimants and the unemployed involves showcasing services through the Wagner Peyser program at AJCs. These services, available virtually and in-person, cover resume building, job matching, interviewing techniques, workshops, and referrals to core and community partners.

- Individuals and UI recipients are encouraged to create a Vermont Job Link (VJL) account, a central hub for posting resumes and facilitating employer reviews. VJL's documentation allows us to track progress and collaborate with partners through data-sharing agreements. For RESEA program participants, UI coordinators offer ongoing support.
- Our aim is to simplify and enhance the journey back to employment, providing guidance at every step.

Outreach to employers is conducted in various ways, including self-service or staff-assisted, which entails a member of the business service team conducting outreach to an employer and sharing the work and services of the workforce development department. All WFD staff are trained in the services of the RESEA program, the services of WP, and core partner programs.

#### Wagner Peyser Services Overview

- Wagner Peyser services are accessible in person or virtually, with VDOL establishing community relationships post-pandemic for more accessible services.

- UI claimants must create a Vermont Job Link (VJL) account, offering a streamlined process for entering work experience or uploading resumes. Employers can also access resumes in the system, and AJC staff can refer individuals to suitable positions.
- AJC staff know the adjudication/appeal process and provide necessary support for UI appeals.
- AJC staff, trained in triage, specialize in referring individuals to programs meeting their employment needs, including UI, WIOA, WP, JVSG, ESD, VEL, A4TD, HireAbility, ICAN, and others.

E. AGRICULTURAL OUTREACH PLAN (AOP). EACH STATE AGENCY MUST DEVELOP AN AOP EVERY FOUR YEARS AS PART OF THE UNIFIED OR COMBINED STATE PLAN REQUIRED UNDER SECTIONS 102 OR 103 OF WIOA. THE AOP MUST INCLUDE AN ASSESSMENT OF NEED. AN ASSESSMENT NEED DESCRIBES THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

1. ASSESSMENT OF NEED. PROVIDE AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

Vermont agricultural workers are made up of two main groups; the temporary agricultural (H2A) workers that support crop growing and harvesting and those that support year-round dairy farmers. The number of year-round dairy farmers has declined in recent years due to the decrease in the number of active working dairy farms. The temporary, seasonal farmworkers (MSFWs) have increased due to the increase in diversified crop farming.

After a lengthy period of vacancy, VDOL has recently filled two key roles that support the agricultural employees, the State Monitor Advocate and an Agricultural Outreach Worker. Both new staff members have received extensive onboarding and training, which has included re-engaging with key partners in serving the agricultural community. This includes Migrant Justice, PathStone, Farm First, University of Vermont Extension Service and the Open Door Clinic. They partnered with the VT Agency of Agriculture in the fall of 2023 to conduct outreach to Vermont farmworkers eligible to receive the Farm and Food Workers Relief Program. The staff visited farms and community centers where they assisted the farmworkers to complete the FFWRP application. This provided a one-time \$600 payment to eligible farmworkers.

Plans for re-establishing regular field visits to MSFWs in the current season have begun. Outreach has been sent to all H2A farms to advise them of planned visits and the services that will be available to their workers. Many Vermont farm owners that hire H2A workers have had the same workers and their family members return for many years. Relationships are strong and, in some cases, familiar. Some of the needs that we anticipate supporting include connections to healthcare, including mental healthcare and education. The VDOL team will make referrals and engage partners to support the needs of these workers.

With the growing trend towards business diversity for producers in Vermont, the use of H2A has increased. VDOL will continue to work with the Vermont Agency of Agriculture, Food and

Markets (AAFM) and the private sector to provide information on labor laws for agricultural employers. VDOL works to educate stakeholder partners on eligibility requirements for services so that workers and employers understand how VDOL and US DOL intersect in serving both populations.

VDOL plans to partner with AAFM to offer agricultural employer information sessions 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.

2. AN ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE MEANS: 1) IDENTIFYING THE TOP FIVE LABOR-INTENSIVE CROPS, THE MONTHS OF HEAVY ACTIVITY, AND THE GEOGRAPHIC AREA OF PRIME ACTIVITY; 2) SUMMARIZE THE AGRICULTURAL EMPLOYERS' NEEDS IN THE STATE (I.E. ARE THEY PREDOMINANTLY HIRING LOCAL OR FOREIGN WORKERS, ARE THEY EXPRESSING THAT THERE IS A SCARCITY IN THE AGRICULTURAL WORKFORCE); AND 3) IDENTIFYING ANY ECONOMIC, NATURAL, OR OTHER FACTORS THAT ARE AFFECTING AGRICULTURE IN THE STATE OR ANY PROJECTED FACTORS THAT WILL AFFECT AGRICULTURE IN THE STATE

Agriculture has long been an important part of Vermont's economy. Industry has a tremendous direct and indirect economic impact on the State. Most of the agricultural activity continues to be from small family farm producers. Vermont's geographic conditions are fairly uniform across the state, but there is a concentration of apple orchards along the western shores of Lake Champlain that includes Chittenden, Addison, Rutland and Bennington counties that will be an area of focus for VDOL outreach staff and key partners.

Agricultural activity in the State has not changed significantly from previous years. Most of the seasonal farm work in the State is in producing vegetables, strawberries, raspberries, blueberries, and apples. Heavy activity months are from March through October. As most farms in Vermont are small, family run farms, 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. With the challenge of hiring agricultural workers, the number of H2A visas remained consistent at approximately 10% of all farm labor in Vermont. Most H2A workers are for apple and other crop harvest openings. In June 2023, VDOL filled the role of State Monitor Advocate which is critical to the success in serving farm owners and farmworkers. We have invested significantly in the onboarding and training of this role and have included cross-training of other key leadership.

VDOL will continue efforts to create and strengthen relationships with other State agencies, non-profit and private organizations such as the Northeast Organization Farming Association of Vermont (NOFA), Migrant Justice Organization, the University of Vermont Extension Service, and the Vermont Sustainable Jobs Fund to develop a more comprehensive outreach plan for both the employer and farmworker populations in Vermont. These relationships will provide the basis for reaching out to farm workers to assess and address their employment, training, and housing needs.

Given the nature of the agricultural business in the State, it is unlikely that more than a handful of migrant workers will travel to Vermont to harvest crops in the next program year. Generally, workers come from the local communities and return to their permanent residence on 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.

3. AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS MEANS SUMMARIZING MIGRANT AND SEASONAL FARM WORKER (MSFW) CHARACTERISTICS (INCLUDING IF THEY ARE PREDOMINANTLY FROM CERTAIN COUNTRIES, WHAT LANGUAGE(S) THEY SPEAK, THE APPROXIMATE NUMBER OF MSFWs IN THE STATE DURING PEAK SEASON AND DURING LOW SEASON, AND WHETHER THEY TEND TO BE MIGRANT, SEASONAL, OR YEAR-ROUND FARMWORKERS). THIS INFORMATION MUST TAKE INTO ACCOUNT DATA SUPPLIED BY WIOA SECTION 167 NATIONAL FARMWORKER JOBS PROGRAM (NFJP) GRANTEES, OTHER MSFW ORGANIZATIONS, EMPLOYER ORGANIZATIONS, AND STATE AND/OR FEDERAL AGENCY DATA SOURCES SUCH AS THE U.S. DEPARTMENT OF AGRICULTURE AND THE U.S. DEPARTMENT OF LABOR (DOL) EMPLOYMENT AND TRAINING ADMINISTRATION

Total Farm Employment in Vermont is 8,331 (USDA Ag Census 2022) on approximately 1800 farm operations. Of these, 852 are migrant workers, most here in Vermont on an H2A visa. Very few migrant workers travel to Vermont to harvest crops.

Vermont primarily sees MSFW's from Jamaica and Puerto Rico responding to H-2A job postings. The majority of identified crop workers in the state are through the H-2A program and as such, 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. Recent efforts have been undertaken to work with state and local partners to better understand this count. 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 count is taken from information provided by PathStone, the National Farmworkers Jobs Program (NFJP), Workforce Innovation and Opportunity Act (WIOA) section 167 grantee.

#### 4. OUTREACH ACTIVITIES

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

In addition to filling and onboarding the SMA role in 2023, VDOL also hired a part-time Outreach Workers. The Outreach Worker brings previous experience with farm visitation and service delivery. With some recent data on the farmworker population that was collected through field visits in the summer of 2023 around the catastrophic flooding that impacted many farm operations, the new Outreach Worker will have a place to start in scheduling in their new role. This outreach provided insights into current numbers, demographics and working conditions for those workers. There were not significant violations uncovered, but the visits have provided a strong foundation of trust and understanding for the new Outreach Worker to build on.

Additionally, VDOL staff joined with partners from the Agency of Agriculture, Farm First, Migrant Justice, PathStone and other community organizations to administer the Farm and Food

Worker Relief Grant Program. In partnership with PASA, the Vermont team visited farms around the state, took 165 applications bringing close to \$100,000 of relief payments to Vermont farmworkers.

Building on the strong outreach efforts that occurred in 2023, Vermont is committed to growing its outreach work in the coming years. VDOL has begun the process of rebuilding capacity for this important work and will continue to increase the outreach to and understanding of the needs of farmworkers in Vermont.

The VDOL Outreach Worker will collaborate with the Agency of Agriculture, Migrant Justice, Farm First, UVM Extension Service and other entities that support the farming community to conduct direct email and USPS mailings to farm owners. This outreach will include an overview of the Agricultural Outreach/MSFW programs. This will provide notice of the intent of field visits and request assistance to schedule these visits. The farm owners will be advised that VDOL is required to provide agriculture employees with information and resources on career services, referrals to training and supportive services, and details about the Employment-related Law Complaint Systems.

Additionally, the VDOL Outreach Worker will outpost at the Open Door Clinic in Middlebury, Vermont. The Open Door Clinic is a trusted healthcare provider for farmworkers. Also, the Outreach Worker will make joint visits to farms with staff from University of Vermont Bridges to Health that has undertaken a campaign to make visits to Vermont farms to reduce barriers to healthcare for farmworkers.

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

In addition to filling and onboarding the SMA role in 2023, VDOL also hired a part-time Outreach Workers. The Outreach Worker brings previous experience with farm visitation and service delivery. With some recent data on the farmworker population that was collected through field visits in the summer of 2023 around the catastrophic flooding that impacted many farm operations, the new Outreach Worker will have a place to start in scheduling in their new role. This outreach provided insights into current numbers, demographics and working conditions for those workers. There were not significant violations uncovered, but the visits have provided a strong foundation of trust and understanding for the new Outreach Worker to build on.

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**B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH STAFF. TECHNICAL ASSISTANCE MUST INCLUDE TRAININGS, CONFERENCES, ADDITIONAL RESOURCES, AND INCREASED COLLABORATION WITH OTHER ORGANIZATIONS ON TOPICS SUCH AS ONE-STOP CENTER SERVICES (I.E. AVAILABILITY OF REFERRALS TO TRAINING, SUPPORTIVE SERVICES, AND CAREER SERVICES, AS WELL AS SPECIFIC EMPLOYMENT OPPORTUNITIES), THE EMPLOYMENT SERVICE AND EMPLOYMENT-RELATED LAW COMPLAINT SYSTEM (“COMPLAINT SYSTEM” DESCRIBED AT 20 CFR 658 SUBPART E), INFORMATION ON THE OTHER ORGANIZATIONS SERVING MSFWs IN THE AREA, AND A BASIC SUMMARY OF FARMWORKER RIGHTS, INCLUDING THEIR RIGHTS WITH RESPECT TO THE TERMS AND CONDITIONS OF EMPLOYMENT.**

The Outreach Worker is classified in Vermont's position management system as a Job Center Specialist II - which is the classification for the majority of the employees who work in the American Job Centers across the state. As such, the Outreach Worker will receive the same training that those employees receive. The training includes the use of our case management system, Vermont Job Link, and includes resume and interview skills developmental training, how to make referrals within the job center network and among its partners, and training on the Employment-Related Law Complaint System. The training will also include de-escalation tactics and other training aimed at improving employee safety in the workplace.

The Outreach Worker is a relatively specialized position and any outreach specific training they receive will come from the U. S. Department of Labor, including participating in virtual meetings they host. Training for this position will include visits to neighboring states to shadow their Outreach Workers and learn how they perform the role. Vermont invites any technical assistance on the topic of training the Outreach Worker should receive.

**C. INCREASING OUTREACH WORKER TRAINING AND AWARENESS ACROSS CORE PROGRAMS INCLUDING THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING ON IDENTIFICATION OF UI ELIGIBILITY ISSUES**

The Outreach Worker 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. They will be knowledgeable in the appropriate circumstances for referral of an MSFW to unemployment insurance. Training will be provided to the Outreach Worker as necessary to assist them 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**

The Outreach Worker 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. They will be knowledgeable in the appropriate circumstances for referral of an MSFW to unemployment insurance. Training will be provided to the Outreach Worker as necessary to assist them in assessing when an MSFW ought to be referred to unemployment insurance for assistance and an eligibility determination.

**E. COORDINATING OUTREACH EFFORTS WITH NFJP GRANTEES AS WELL AS WITH PUBLIC AND PRIVATE COMMUNITY SERVICE AGENCIES AND MSFW GROUPS**

See: e. 4. Outreach Activities

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

Describe the State agency's proposed strategies for:

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

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

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

VDOL does not anticipate a significant increase in the number of eligible MSFWs in Vermont. Going forward, the outreach activities will be conducted proportionate to the number of MSFWs identified statewide. However, there has been a clearer understanding for the farmworker community that includes undocumented workers. The VDOL estimates that the number of days of outreach contact, including visits to working, living, and gathering areas, will range from 7-14 days per month. 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, visits will most likely be concentrated on apple orchards that package apples. June – August will be concentrated on berry farms, and August – October will be on vegetable farms.

The Outreach Worker will conduct field visits to the working and living areas of MSFWs to provide employment services. An explanation of workforce services will be made 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 through the use of translation and interpretation services.



Services provided to MSFWs will be tracked in the Vermont Job Link system. 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.

The Outreach Worker 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. They will be knowledgeable in the appropriate circumstances for referral of an MSFW to unemployment insurance. Training will be provided to the outreach worker as necessary to assist them in assessing when an MSFW ought to be referred to unemployment insurance for assistance and an eligibility determination.

VDOL is in the process of updating its MOU with PathStone, the 167 National Farmworker Jobs Program (NFJP) grantee, to address the coordination of outreach efforts in Vermont. The current MOU sets out responsibilities to ensure the most effective and efficient utilization of US DOL funds for the administration and operation of the Migrant 7 Seasonal Farm Worker outreach programs. It describes that both organizations will coordinate outreach, require participants to be registered in VJL, refer eligible participants in appropriate WIOA One-Stop partner programs, share information and collaborate on special projects, training, and professional development activities. The VDOL SMA will coordinate in person visits with PathStone at least annually. Further, VDOL leadership will support public and private community service agencies and MSFW groups by attending meetings, providing services, making resources available, and helping in other ways when requested. 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.

Outreach to agricultural employees 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 because 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 One-Stop Career Center staff throughout the state to encourage local domestic U.S. workers to apply for H-2A jobs.

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. Staff will also continue to make partner organizations aware of the complaint system during meetings and formal contacts. Internal training will be delivered in early 2024 to address the changes to the Complaint System and distribution of the updated mandatory posters.

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):

Vermont-Farm-Labor-Wage-and-Hour-and-Housing-Fact-Sheet.pdf

Services available to farmers and farmworkers are available online at [labor.vermont.gov](http://labor.vermont.gov) and the Vermont Job Link website at [www.vermontjoblink.com](http://www.vermontjoblink.com). These websites include useful phone numbers and services provided to both farm workers 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 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.

Several employment-related services for businesses are available at the Vermont's local One-Stop Career Centers. These include:

- Posting of jobs,
- Assistance with small and large-scale recruitment activities,
- Help planning job fairs,
- Testing and assessment of job candidates,
- Labor market information,
- Information on training grants and tax credits.

## B. MARKETING THE EMPLOYMENT SERVICE COMPLAINT SYSTEM TO FARMWORKERS AND OTHER FARMWORKER ADVOCACY GROUPS

The VDOL will educate farmworkers about the complaint system through staff in-person visits to farms and by posting an on-site poster that informs readers of the complaint system. Staff will also continue to inform partner organizations of the complaint system during meetings and formal contacts. Internal training will be delivered in early 2024 to address the Complaint System changes and distribute the updated mandatory posters.

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## C. MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM FOR U.S. WORKERS (ARS) TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

The VDOL intends to more closely coordinate promotion of the Agricultural Recruitment System with the Agency of Agriculture, Food, and Markets (AAFM). A Communication and Outreach Coordinator position was recently added to the Workforce Development Division. This position will develop outreach and promotion plans for all programs within the division, including for the MSFW, foreign labor certification, and agricultural recruitment system. At a minimum, we plan to update and improve our web presence by updating our website to include relevant, timeline, plain language information. We will coordinate promotional events with the AAFM.

## 6. OTHER REQUIREMENTS

### A. COLLABORATION

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

The VDOL has an existing MOU with the Agency of Agriculture, Food and Markets (AAFM) where in AAFM employees conduct MSFW housing inspections and communicate the results to VDOL.

The VDOL is in the process of re-negotiating and updating our MOU with PathStone.

### 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.

Vermont's draft state plan was available for comment from January 26, 2024, to February 20, 2024, through the State Workforce Development Board's and the Vermont Department of Labor websites.

No comments were received.

### C. DATA ASSESSMENT

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

Vermont has historically reported very low MSFW activity on quarterly and annual Lears Reports. However, with new staffing and renewed partnerships being formed, it is a goal to increase those numbers over the next four years. Connecting with MSFWs and documenting services provided to them will support the goal of reaching marginalized populations and increasing the Vermont labor force.

With new staff in the Outreach Worker and SMA roles, and a newly formed Analytics and Insights team that will be focused on data driven decision making and data informed improvements to the workforce development and agriculture outreach program Vermont is poised to make improvements in data assessment. In the first year of this plan, Vermont will request technical assistance in the area of data assessment for the agriculture outreach program.

### 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 Department of Labor's Workforce Development Division is small, relative to other states. In the last 18 months the entire leadership of the workforce development division turned over, as did staff working on the agriculture outreach/MSFW program.

This turnover and on-boarding of completely new staff makes it difficult to reflect on what was achieved. Vermont requests a reset in this regard. With technical assistance and support from Regional and National Office staff, we will start off on a strong footing for the next four years.

#### E. STATE MONITOR ADVOCATE

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

The State Monitor Advocate has reviewed and approved this Agricultural Outreach Plan.

#### WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	Yes
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	No
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and	Yes
4. SWA officials: 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been discontinued; 4) Approve corrective action plans; 5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days; 6) Enter into agreements with State and Federal enforcement agencies for enforcement-	Yes

The State Plan must include	Include
agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and 7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.	
5. The SWA has established and maintains a self-appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance (20 CFR 658.601).	Yes

**WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS**

**Performance Goals for the Core Programs**

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

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

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

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

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

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

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

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

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

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

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

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each

of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	61.0%	61.0%	61.5%	61.5%
Employment (Fourth Quarter After Exit)	54.0%	55.5%	54.5%	56.0%
Median Earnings (Second Quarter After Exit)	\$6,798	\$7,250	\$6,934	\$7,500
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

## PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAMS

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

### A. ALIGNING OF CONTENT STANDARDS

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

The Vermont Agency of Education (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.

AEL in Vermont has integrated with Transferable Skills, an aspect of Vermont's Education Quality Standards (EQS). Transferable skills include skills in communication, collaboration, creativity, innovation, inquiry, problem solving and the use of technology. Every hour of instruction tracked in the AEL database must display the predominant standard addressed in the session – whether it is a Transferable skill or a CCRS for Adult Education standard. The Transferable skills of EQS align well with WIOA's Workforce Preparation Activities, services that "... help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education or training, or employment." [Sec. 203 (17)]

Vermont's Flexible Pathways Initiative includes virtual learning and blended learning, Dual Enrollment, Early College, Career and Technical Education, Work-Based Learning, Expanded Learning Opportunities, the Adult Diploma Program and GED Program, and the High School Completion Program (HSCP). This statute, "Flexible Pathways to Secondary School Completion," also requires secondary schools serving publicly-funded students to create Personalized Learning Plans (PLPs) for all students in grades 7-12, and flexible pathways to secondary school completion which can include opportunities for learning that fall outside of a traditional school setting.

Vermont is committed to continuing to offer unenrolled from school AEL students access to a diploma through the Flexible Pathways Initiative. The HSCP is a potential component of a flexible pathway for any Vermont student who is at least 16 years old, who has not received a high school diploma, and who may or may not be enrolled in a public or approved independent school. The large majority of students (96% in 2022-2023) who participate in the HSCP are unenrolled from school. Adult Education and Literacy providers are responsible for developing a personalized learning plan with the student and the partnering high school that will meet the graduation requirements of the high school in the student's district of residence.

Additionally, Vermont's State Plan for Every Student Succeeds Act (ESSA) aligns with Adult Education and Literacy in several ways. College and Career Readiness indicators will be used to measure academic proficiency, as well as graduation rates, English language proficiency, and standards in English language arts and mathematics. Of special note are the college and career ready indicators that are used as part of ESSA, which are also outcomes tracked under WIOA.

ESSA requires that States hold schools accountable for the graduation rate using the federal definition of a 4-year cohort calculation. Vermont also measures the percentage of students graduating within a 6-year extended graduation rate. In 2014, the Vermont State Board of Education adopted the Education Quality Standards, which call for a proficiency-based graduation requirement that emphasizes mastery rather than time as the critical factor in determining if a student has met career and college ready expectations. As such, students are encouraged to pursue flexible pathways that enrich their learning and better prepare them for

positive post-secondary outcomes. Consistent with this legislation and with adult education, Vermont places greater value on completion of secondary school with mastery of critical skills than completion within a traditional timeframe.

## B. LOCAL ACTIVITIES

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

### ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

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

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

The Vermont AOE runs 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 are awarded to eligible providers of services for two or more years for the purpose of establishing AEL and operating programs that provide some or all of the eight WIOA Title II activities as warranted by demographic data and the quality of

applications to serve one or more particular counties. The State will award grants or contracts in compliance with 34 CFR part 463, Subpart C.

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 SWDB 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) and potentially other electronic means;

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, including individuals with disabilities and other special needs, to attend and complete programs;
12. whether the provider maintains a high-quality information system 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.

Adult Education and Literacy programs and services will advance the aspirational goals of this WIOA Combined State Plan where applicable including as described below:

- **Goal 1:** Ensure that people in Vermont have easy access to education, training, and services that support attainment of their career and financial goals.
  - AEL providers will continue to expand outreach efforts to all eligible students including historically marginalized, those with low levels of literacy, English language learners, those with disabilities, and those with multiple barriers to employment.
  - Flexible scheduling of services for students will be expanded and included in marketing messages from AEL providers.
  - The AOE will leverage resources and continue to offer training and technical assistance opportunities to support AEL providers to develop and implement Integrated Education and Training programs that match student training needs with local workforce needs.
  - AEL providers will continue to offer both in-person and remote services. Vermont's distance education policy allows for virtual proctoring of assessments, distance education, and proxy hours using approved platforms. Virtual intake and orientation also are available in each region of the state. An emphasis is placed on providing equitable services to students, who may borrow computers and equipment. Assistance accessing the internet is also provided through information on free Wi-Fi availability, access to public programs that help pay for internet, or the provision of hotspots.
- **Goal 2:** Ensure that everyone – including women, Veterans, minorities, people with disabilities, and other underrepresented groups - can contribute and thrive in high demand careers that will directly impact Vermont's success over the next decade - housing, broadband access, climate resiliency, transportation infrastructure, childcare, education, and healthcare.
  - The AOE and AEL providers will work with partners and align services with Vermont's final Digital Equity Plan, especially the elements and goals of the plan

to advance digital literacy and to advance workforce development for broadband and the digital economy by matching training opportunities with student career interests in those fields.

- The AOE and AEL providers will strengthen collaborations with Vocational Rehabilitation to ensure high-quality services for customers with disabilities that lead to employment.
- Integrated Education and Training programs that prepare students to work in in-demand industries such as weatherization, childcare, and healthcare will continue to be developed and implemented.
- Goal 3: Increase assistance to Vermonters to encourage high school completion, earn additional qualifications like industry-recognized certificates, participate in registered apprenticeships, or pursue post-secondary degree program.
  - AEL providers will offer instructional services to prepare for the GED and will provide access to official GED testing in compliance with GEDTS regulations and State policy for earning a GED Certificate.
  - High School Completion Program will remain accessible to unenrolled from school students who meet eligibility requirements in compliance with state statute, policy and structures for earning a high school diploma.
  - AOE and AEL providers will access industry-recognized credentials (IRCs) that are available, identify pre-requisites for earning credentials and develop instructional strategies and IET programs that expand successful completion IRCs;
  - AOE will work with the Vermont Department of Labor and the One-Stop Operator to help AEL providers identify local registered apprenticeship opportunities and explore developing pre-apprenticeship programs (which may also be Integrated and Education Training programs) for AEL students.
  - Services that lead to successful transition to post-secondary education will be provided through access to IRCs, career exploration and information on career pathways, exposure to post-secondary level instruction through the dual enrollment program for eligible students, linkages with Vermont Student Assistance Program and other resources that provide information on financing post-secondary education. In addition, transition plans will be created for every AEL student that include exploration and resources for transition to post-secondary and employment.
- Goal 4: Integrate continuous improvement practices into the operations of the workforce development system, its core partners and education and training providers, so the system can effectively serve as many individuals and businesses as possible.
  - AOE and AEL providers will participate in all One-Stop Operator facilitated trainings and meetings to improve operations and referral processes among one-stop partners.

- Regional one-stop meetings will be convened to ensure strong local collaborations that increase the number of Vermonters served by one-stop partners efficiently and effectively.
- AOE and AEL providers will collaborate with one-stop partners to ensure high-quality case management services for customers facing multiple barriers and to decrease duplication of these services.
- AOE will work with Department of Labor and Vocational Rehabilitation to identify and implement co-location opportunities.
- Goal 5: Meet the needs of Vermont’s employers by proactively engaging education institutions, youth, young adults, and college students at key transition points, to increase their awareness of the many career entry and advancement opportunities around the state.
  - AEL providers will continue to engage adults at key transition points, such as English language learners and displaced homemakers. All AEL students are provided with career services identified in Program Memorandum OCTAE 17-2, Table C. Career services include information during intake and orientation regarding the resources available through one-stop partners and appropriate referrals for students at intake and throughout their participation in AEL.
- Goal 6: Ensure employers have the tools they need to navigate labor shortages by linking them to on-the-job training programs, technical assistance, information on best practices in job design, hiring, compensation, and emerging expectations that workers have of their workplace.
  - Adult Education and Literacy providers will continue to conduct outreach to employers to offer information and support regarding services available to employers and employees through the one-stop delivery system. AEL providers also provide access to education and training for employees that may include skills development such as English language skills, math, or reading comprehension.
- Goal 7: Adapt the public workforce system’s access points to ensure hyper local and virtual components are available to meet the needs of jobseekers of every generation and background.
  - Local AEL programs will collaborate with local one-stop partners to develop the most flexible and responsive methods to ensure access to services, whether in-person or virtually, including virtual contact with co-enrolled customers as part of the co-location services and providing services outside of business hours.
- Goal 8: Align data collections across the workforce system so that data can be more effectively and efficiently used to inform decisions, to identify gaps in service delivery, to uncover gaps in training and credentialing, and to foster equity and accessibility within the public workforce system and among the core partner programs.
  - AOE will work with core programs to align data collections and provide technical assistance to AEL providers to utilize these tools.

### C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate programs that provide any of the following correctional educational programs identified in section 225 of WIOA:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

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

If the State awards funds for Corrections Education, the State will ensure that no more than 20% of the Instructional Funds (82.5%) are used for corrections education. Any funds allocated under section 225 will be tracked according to the budget submitted by the awarded local provider and approved by Vermont AOE. Each eligible agency utilizing funds provided under Programs for Corrections Education and Other Institutionalized Individuals must prioritize serving individuals expected to be released from the correctional institution within five years and 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 AEL grant 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 who do not have a diploma and/or are basic skills deficient and/or are English language learners, are enrolled in the Community High School (CHSVT) of Vermont and therefore, 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 CHSVT 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 correctional facilities around the state. The Community High School serves all incarcerated persons under the custody of the Commissioner of Corrections who meet their eligibility definition. Under Vermont law, incarcerated individuals under the age of 23 who do not have a diploma are required to be enrolled at CHSVT upon admission into the correctional facility.

Due to the short sentences that many incarcerated individuals receive, referrals are routinely made to local AEL providers as learners transition from CHSVT back to the community. DOC personnel, including probation officers and CHSVT staff, refer adults re-entering 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. The CHSVT and the AOE will continue to work together to remove barriers to transitions, such as through sharing assessment administration and beginning introductions to AEL services with adults scheduled to be released from incarceration within 90 days.

At the State level, core partners have been participating in the Adult Reentry and Employment Strategic (ARES) Planning Grant's Cross-Disciplinary Workgroup, which was convened when DOC received the ARES Planning and Implementation grant in 2017. The priorities of this working group are to complete the systemic work regarding the definitions of job readiness best practices, process mapping and identification of gaps and use of the proposed pilot projects to assist in strategic planning and implementation of services supporting incarcerated individuals reentering into the community and securing of career enhancing employment opportunities. The group continues to support the work of the ARES grant in evaluation of the systemic pilots in transition, data sharing and evaluation, and providing updates and opportunities for continued collaboration and enhancement to reduce the barriers of our shared population.

#### D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate Integrated English Literacy and Civics Education (IELCE) programs under section 243 of WIOA. Describe how adult English language learners, including professionals with degrees and credentials in their native countries, are served in IELCE programs.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be offered in combination with integrated education and training activities found in 34 CFR section 463.36.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

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



its functions to carry out the activities of the program.

IELCE 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 (ELL) demographics for a state and immigration patterns. It is anticipated that the Vermont AOE will continue to receive the established minimum or slightly more, \$60,000 per year; this amount is distributed by the Vermont AOE in one or more grants to provide IELCE services through an open competition for funding.

The State will run its competition in accordance with 34 CFR 463 subpart C as described in b. local activities. The Vermont AOE will request formal proposals from local service providers eligible for funding under WIOA Title II to provide the services of IELCE 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 IELCE.

The number of students served with IELCE funds declined by 40% in program year 2020 as compare to the last pre-pandemic program year 2018. The number served increased again over two years, and surpassed pre-pandemic levels by 17%. Each year, the number of IELCE students represents roughly 70% of the overall ELL students served in Vermont. This is because Vermont focuses the limited amount of IELCE funding received in the areas where it is needed the most, as determined by census data, history of students served in each region of the state, and by AEL provider capacity to provide all of the focused IELCE services to students that include IET programs. As a result of the grant competition held in the spring of 2023, two providers were selected to implement IELCE programs during program years 23 and 24 in these three counties: Washington, Chittenden, and Windham. The next competition for these funds will be held in the spring of 2025, which will again determine which areas of the state are most in need of IELCE funding, and which areas have the necessary population with similar career interests that meet the local workforce needs so that IET programs can be designed and implemented.

Individualized lessons and small group classes focus on English language acquisition through increased proficiency in the four skills of speaking, listening, reading and writing in combination with the development of US citizenship skills, civic participation, and the development of work readiness skills for improved employment.

Providers also work with students to help them leverage their skills gained in their home country to find employment in the U.S. in the same industries (i.e., banking, education, allied health, hospitality, construction, transportation.) Other activities may include registering to vote, learning how to use the library, learning about the educational system that their children participate in and how to communicate with teachers about their children's education.

AEL providers work with other partners in the workforce development system supporting immigrants to find work, including the State Refugee Office, the Central VT Refugee Action Network, and U.S. Committee for Refugees and Immigrants.

There are several IET programs that will be made available to IELCE students focused on Weatherization, heat pump installation, and Licensed Nursing Assistant. Curricula is developed through identification of areas where English language learners may need additional preparation and support in order to participate in the IET programs successfully. Grantees

collaborate with local employers, Career Technical Education (CTE) centers, WIOA Title I programs and/or others to develop and implement IET programs. In addition, grantees will explore developing IET programs that are also pre-apprenticeship programs in order to prepare students to succeed in Vermont's Registered Apprenticeship programs, which has sponsors representing in-demand industries including line maintenance, electrical, childcare, plumbing, and others.

English language instruction is contextualized for work, using the Teaching Skills That Matter materials and resources. Contextualization is also accomplished through the Burlington English and/or Ventures curriculum that is language instruction applied to a variety of specific career pathways that integrates with the rights and responsibilities of citizenship and civic participation.

Local AEL programs engage students one-on-one and in small groups to achieve their goals related to citizenship and civics with the following materials and activities:

- Citizenship and civics instructional materials available online from United States Citizenship and Immigration Services, USA Learns.org, and World Education (VERA) for lecture, discussion, and studying history.
- Practice interviews to help students prepare for the naturalization and citizenship process.
- Contextualized instruction during the November and the local March election cycles to prepare students on the rights and responsibilities of citizenship, including examination of issues on the ballot or that have been warned for local town meetings.
- Field trips to community establishments such as libraries, town offices, and polling locations.
- Facilitated conversations during visits with elected officials (legislators, mayors, town clerks) at AEL learning centers.

Grantees will use the state plan and local workforce system data to identify additional in-demand industries. They will collaborate with local employers, in coordination with the one-stop network, in these industries to identify the specific skills that will be addressed in the workforce training component of the IET programs designed for the IELCE participants. Whenever possible, grantees will obtain commitments from employers to hire IELCE participants upon completion of their training and studies.

The risk of overwhelming employers with contacts from multiple "helpful" one-stop partners dictates the need for coordination with local regional core partners in offering services to employers and in identifying job placement opportunities for students. AEL providers participate in the HireAbility Workforce Partners groups hosted by the Division of Vocational Rehabilitation. These groups share information about employers who are hiring and what skills are needed. Though the Workforce Partners groups focus on placing disabled workers in gainful employment, the connections established and information disseminated through these regular meetings with local one-stop partners benefits all customers and students experiencing a range of barriers to employment.

Other services that facilitate access to employment are coordinated in response to the in-demand local industries. AEL providers have also historically engaged in state-level collaboratives for Work-Based Learning, which provides opportunities for sharing of best practices, alignment of strategies and resources and coordination across systems.

As a small state, Vermont has one workforce development board that is responsible for meeting WIOA requirements and one Federally-recognized One-Stop Center. The One-Stop Center is located in Burlington, the center of the most populous region of the state. Regional workforce development systems include the one-stop partner convenings, and local workforce investment boards (some are state-recognized), secondary and adult career and technical education centers, local colleges, the Vermont Refugee Resettlement program, and others. Local AEL providers will design IELCE programs to integrate with the local workforce development system and its functions to carry out IELCE activities, including IET programs. This will be accomplished through participation in meetings and events of the local workforce development system and ongoing communication and collaboration with the one-stop partner network.

#### 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

AEL programs 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 executed in July of 2017 and a subsequent MOU was developed to span the period of July 1, 2022-June 30, 2025. Adult Education and Literacy programs will adhere to the MOU established and signed by the Vermont AOE. The AOE will work with the One-Stop Operator to carry out the activities of the MOU and to provide local AEL providers with technical assistance to expand coordination with one-stop partners that result in robust services for customers/students. Technical assistance activities will include refining referral processes, providing broad and equitable access to credential attainment, developing protocols for co-enrollment, common trainings to align services, quarterly meetings, and leveraging physical space through co-location.

The AOE will carry out required State Leadership activities as follows:

- Professional development opportunities for AEL staff include those planned for and provided by AEL staff. Recently, Vermont has participated some national offerings that will be sustained with State-level technical assistance including:
  - The Teaching Skills That Matter training which resulted in training tools for new teachers. All teachers will continue to have access to the Community of Practice, which includes live office hours with AOE staff;

- The IET Basic Design Camp, which has led to the acceptance of Vermont's participation in the IET Advanced Design Camp for the spring of 2024. AOE will continue beyond this opportunity to devote staff time to assist local programs in developing and implementing IET programs;
- ELP standards integration - in collaboration with LINCS, the AOE is offering professional development on integrating English Language Proficiency (ELP) Standards with Academic Content Standards. This series of opportunities will be sustained through repetition and targeted technical assistance after the initial launch in the fall of 2023. All AEL teachers will need to participate and develop practices to make all academic content, and therefore high school completion, accessible to English Language Learners.
- In addition, the State will remain focused on the following areas to support local AEL programs to provide rigorous services:
  - assessment literacy – the AOE is developing revised tools for local programs to support existing test administrators and new test administrators to:
    - understand and describe the types of assessments and their use in instructional settings;
    - understand the context and purpose of assessment in the National Reporting System and for WIOA-funded programs;
    - understand and describe the rigorous process that assessment publishers must follow to obtain NRS assessment approval; and,
    - maintain the integrity and security of all assessments.
  - Continuing to expand supports and professional development in instructional practices, including through the Student Achievement in Reading (STAR) program and State-level initiatives in teaching literacy for K-12 and adult education teachers.
  - AEL will utilize state resources and colleagues at the Agency of Education to provide support and training on the development of 504 plans, supporting adult learners with diagnosed or undiagnosed disabilities, and developing rigorous transition plans.
  - Trauma-informed practices in intake and instruction – the AOE will develop a list of resources for training and disseminate to local programs. Additional trainings may be developed by the AOE to assist local programs to serve marginalized populations, such as English language learners, adults with disabilities, and those facing multiple barriers.
  - The AOE currently requires that all local provider staff participate in an approved implicit bias training and submit proof of completion to the AOE. The approved training(s) includes strategies for self-identifying and addressing bias to improve inclusive access to programs and services.

All professional development opportunities are shared through the AOE's AEL listserv that is disseminated to local program teachers and other staff.

- Technical assistance to local programs includes:
  - Monthly meetings with local provider leadership staff to provide updates and connections to resources. This time is also used to identify further areas of technical assistance need;
  - Quarterly individual meetings with leadership staff to review progress toward milestones and performance targets;
  - Ongoing support for the role of adult education providers as one-stop partners to provide access to employment, education, and training services; and
  - Assistance in the use of technology, 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 as follows:
  - quarterly desk monitoring includes a review of:
    - post-assessment rates;
    - compliance with assessment policy;
    - numbers of students served;
    - progress toward Measurable Skill Gains and other performance targets; and
    - intensity of instructional services as evidenced by # of hours students receive services as compared to the state average.
  - on-site and/or virtual monitoring includes:
    - AEL provider submission of compliance self-assessment document;
    - AOE compliance verification;
    - interviews with leadership staff, instructors, students, one-stop partners;
    - observations of remote classrooms; and
    - review of records (accounting, student files).
  - on-site monitoring includes a review of:
    - physical accessibility and
    - observations of in-person classrooms.

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

Vermont AOE will provide permissible state leadership activities as follows and as funding permits:

- Vermont AEL will train and deliver online professional development offerings through our state professional development learning management system called PEPPER, which will enable the state to track teacher attendance and certifications;
- Maintain active partnership in the Literacy Information and Communication System (LINCS) in order to foster collaboration amongst other agencies and minimize duplication of effort;
- Continued development and implementation of a distance education policy, including professional development to support the use of instructional technology including the use of learning management systems, state-sponsored or other, to provide distance education services to students through online courses and/or utilization of the HyFlex model;
- Integration of literacy and English language instruction with workforce training, including promoting linkages with employers; and,
- Continued 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. Describe how the eligible agency will take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Describe how the eligible agency will use evaluations, data analysis, program monitoring, or other methods to improve the quality of adult education activities in the State.

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. Co-enrollment data is also shared with Vocational Rehabilitation. The AOE and the Vermont Department of Labor will seek to expand its data share agreement through an amendment that describes processes for sharing co-enrollment data. Of notable importance is continuing to increase 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.

Vermont AOE will continue its 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 through a continuous improvement plan. Targeted technical assistance and further training and support will be delivered to AEL providers with demonstrated need. Those requiring intensive supports may also receive improvement plans.

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 database 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.

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

States must provide written and signed certifications that:

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

**ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM ASSURANCES**

The State Plan must include assurances that:

The State Plan must include	Include
1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;	Yes
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not “eligible individuals” within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;	Yes
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes

AUTHORIZING OR CERTIFYING REPRESENTATIVE

**CERTIFICATION REGARDING LOBBYING**

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a



Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

**Statement for Loan Guarantees and Loan Insurance**

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

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

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

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

<b>APPLICANT'S ORGANIZATION</b>	<b>Enter information in this column</b>
Applicant's Organization	Vermont Agency of Education

<b>PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE</b>	<b>Enter information in this column</b>
First Name	Heather
Last Name	Bouchey
Title	Interim Education Secretary
Email	heather.bouchey@vermont.gov

**SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)**

**EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES**

OMB Control Number 1894-0005 Expiration 02/28/2026

**Section 427 of the General Education Provisions Act (GEPA)** (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

**GEPA Section 427 Form Instructions for State Applicants**

**State applicants must respond to the following four questions:**

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the

information responsive to that question on this form or may restate that information on this form.

- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

### **GEPA Section 427 Instructions to State Applicants for their Subrecipient Applicants**

The State grantee provides a subrecipient applicant seeking Federal assistance instructions and guidance for how it must comply with the GEPA Section 427 requirement. The State grantee determines the form and content of the information a subrecipient applicant must include in its application regarding the steps it proposes to take to ensure equitable access to, and equitable participation in, its local-level project or activity. For example:

- The State grantee may require its subrecipient applicant to use and submit the GEPA Section 427 form that it is required to submit to the Department; or
- The State grantee may use a State-developed form that is sufficient to meet the GEPA Section 427 requirement.
- The State grantee maintains the subrecipient applicants' responses in the State office.

Please refer to GEPA 427 - Form Instructions for AEFLA Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

***Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.***

*GEPA 427 - Form Instructions for AEFLA Application Package*

**State applicants must respond to four questions.**

**The first of four questions is:**

*Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.*

Vermont remains committed to providing students equitable access to and participation in educational programs in accordance with state and federal civil rights protections, including section 427 of the General Education Provisions Act (GEPA). Section 427 of GEPA aligns with Vermont Agency of Education's (AOE) commitment to ensure all students are provided a high-quality education.

AOE will ensure to the fullest extent possible equitable access to, participation in, and appropriate educational opportunities for all teachers and students with special needs. The AOE does not discriminate on the basis of gender, race, national origin, color, disability, age 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.

In Vermont, all entities that carry out Adult Education and Literacy (AEL) activities must also comply with 9 V.S.A. § 4502 (2017), Public Accommodations, which provides the following purpose; "(a) An owner or operator of a place of public accommodation or an agent or employee of such owner or operator shall not, because of the race, creed, color, national origin, marital status, sex, sexual orientation, or gender identity of any person, refuse, withhold from, or deny to that person any of the accommodations, advantages, facilities, and privileges of the place of public accommodation."

Under 9 V.S.A § 4501(1), any "establishment, or other facility at which services, facilities, goods, privileges, advantages, benefits, or accommodations are offered to the general public" is defined as a place of public accommodation.

**2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE  
EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER  
BENEFICIARIES?**

**Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.**

GEPA 427 - Form Instructions for AEFLA Application Package

**State applicants must respond to four questions.**

**The second of four questions is:**

*Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?*

The Vermont Agency of Education anticipates barriers for participation in AEL services for students may include some or all of the Barriers to Employment tracked in the database. Based on current data tracked and from AEL providers, barriers may include:

- Lack of transportation
- Lack of childcare
- Lack of reliable internet service and/or lack of computer equipment
- Low academic and/or digital literacy skills
- Low English language proficiency levels
- Homelessness or
- High stress levels as a result of facing barriers and high demands on time/energy.

Barriers for AEL provider staff may include:

- One or more physical, mental, or emotional disabilities.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

**Section 427 of the General Education Provisions Act (GEPA)** (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

**State applicants must respond to four questions.**

**The third of four questions is:**

*Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?*

The AOE will identify whether barriers may prevent students, teachers, etc. from such access or participation in, federally-funded projects or activities and will take the necessary steps to

overcome barriers to equitable access to all federally-funded programs. Such steps will include, but are not limited to:

1. Ensuring AEL provider compliance with section 427 of the GEPA for all federally funded programs and with state regulations regarding equity for both teachers and students. Example: As a part of desk monitoring, the AOE will review disaggregated data to identify potential areas of concern or limited student access to program activities.
2. Ensuring AEL educational materials are accessible to individuals with disabilities and English learners (including translating material, when appropriate). Example: The AOE requires that students are co-enrolled with core partners as appropriate, including Vocational Rehabilitation, which provides access to Assistive Technology.
3. Providing professional development and technical assistance to ensure AEL students have equitable access to assessments and program services to address those needs from traditionally underrepresented populations including students with disabilities, English learners, and economically disadvantaged students. Example: Technical assistance is provided to AEL providers regarding access to consultation and services that best serve students experiencing multiple barriers to their education and to employment. Example: The AOE, per its assessment policy, requires that AEL providers assist students to apply for and access accommodations, per publisher requirements, when taking assessments, as appropriate.
4. Monitoring that AEL provider staff have the tools and accommodations needed in order to be successful in their work despite any disability or needed accommodation.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

**Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.**

*GEPA 427 - Form Instructions for AEFLA Application Package*

**State applicants must respond to four questions.**

**The final of four questions is:**

*What is your timeline, including targeted milestones, for addressing these identified barriers?*

In accordance with section 427 of the GEPA, AOE will continue monitoring and offering technical assistance to ensure compliance with these regulations as it pertains to all locally developed educational programs under WIOA, Title II. The timeline will follow fiscal year quarterly monitoring activities.

## ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

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

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

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

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

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

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

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

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

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

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

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

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

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	44.0%	44.4%	45.0%	45.0%
Employment (Fourth Quarter After Exit)	42.0%	40.0%	43.0%	40.5%



Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Median Earnings (Second Quarter After Exit)	\$4,200	\$4,425	\$4,500	\$4,450
Credential Attainment Rate	42.0%	45.8%	44.0%	46.0%
Measurable Skill Gains	36.0%	36.0%	37.0%	37.0%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

1

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

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

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

##### A. STATE REHABILITATION COUNCIL.

1. ALL VR AGENCIES, EXCEPT FOR THOSE THAT HAVE AN INDEPENDENT CONSUMER-CONTROLLED COMMISSION, MUST HAVE A STATE REHABILITATION COUNCIL (COUNCIL OR SRC) THAT MEETS THE CRITERIA IN SECTION 105 OF THE REHABILITATION ACT. THE DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPLICABLE, HAS:

*Select A or B:*

*(A) is an independent State commission*

*(B) has established a State Rehabilitation Council*

(B) has established a State Rehabilitation Council

2. IN ACCORDANCE WITH ASSURANCE (A)(1)(B), IF SELECTED, PLEASE PROVIDE INFORMATION ON THE CURRENT COMPOSITION OF THE COUNCIL BY REPRESENTATIVE TYPE, INCLUDING THE TERM NUMBER OF THE REPRESENTATIVE, AS APPLICABLE, AND ANY VACANCIES, AS WELL AS THE BEGINNING DATES OF EACH REPRESENTATIVE'S TERM.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	Second	01/12/2023
Parent Training and Information Center	First	03/01/2023
Client Assistance Program	Ongoing only CAP rep in Vermont	01/01/2023
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	Two counselors both first term	4/17/2024
Community Rehabilitation Program Service Provider  Rep One  Rep Two	Second  First	01/12/2023  01/01/2024
Business, Industry, and Labor	Second	10/01/2021

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Business, Industry, and Labor	First	1/01/2024
Business, Industry, and Labor	Second	10/01/21
Business, Industry, and Labor	Second	10/01/2021
Disability Advocacy Groups		
Rep One	First	05/24/2021
Rep Two	First	4/17/2024
Rep Three	Second	1/12/2023
Current or Former Applicants for, or Recipients of, VR services		
Rep One	Second	1/12/2023
Rep Two	Second	10/01/2021
Section 121 Project Directors in the State (as applicable)		
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	Second	01/12/2023
State Workforce Development Board		

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
	First	4/17/2024
VR Agency Director (Ex Officio)	Ongoing	Ongoing

3. IF THE SRC IS NOT MEETING THE COMPOSITION REQUIREMENTS IN SECTION 105(B) OF THE REHABILITATION ACT AND/OR IS NOT MEETING QUARTERLY AS REQUIRED IN SECTION 105(F) OF THE REHABILITATION ACT, PROVIDE THE STEPS THAT THE VR AGENCY IS TAKING TO ENSURE IT MEETS THOSE REQUIREMENTS.

NA

4. IN ACCORDANCE WITH THE REQUIREMENTS IN SECTION 101(A)(21)(A)(II)(III) OF THE REHABILITATION ACT, INCLUDE A SUMMARY OF THE COUNCIL'S INPUT (INCLUDING HOW IT WAS OBTAINED) INTO THE STATE PLAN AND ANY STATE PLAN REVISIONS, INCLUDING RECOMMENDATIONS FROM THE COUNCIL'S ANNUAL REPORTS, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION AND OTHER COUNCIL REPORTS.

HireAbility has a strong collaborative relationship with the SRC. HireAbility and the SRC worked very closely together to develop the State Plan and in particular, the goals and priorities. The SRC Performance Review subcommittee is charged with reviewing a variety of HireAbility data over the two year period between each State Plan and plan update. Based on this review the subcommittee works in partnership with HireAbility to develop the goals and priorities for the State Plan.

On December 7, 2023, the full SRC reviewed HireAbility's progress towards achieving the goals and priorities for Program Year 2022 and HireAbility's proposed goals and priorities for Program Years 2024 and 2025. Because the SRC has been working on these priorities on an ongoing basis they did not have any major concerns.

SRC members were pleased to see the increase in participants enrolling in post-secondary training and education. They wanted to be sure that participants with the most severe disabilities had the supports they need to succeed. Members were pleased to see the partnerships HireAbility has with Community College of Vermont and Vermont State College to embed contracted staff in those institutions to support participants.

5. PROVIDE THE VR AGENCY'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS, INCLUDING AN EXPLANATION FOR THE REJECTION OF ANY INPUT AND RECOMMENDATIONS.

List each recommendation/input followed by the VR agency response

SRC members did ask that we change references from “substance use disorder” to “substance misuse disorder”. Members noted that many people with chronic health conditions relied on opioids to function, and the old term was stigmatizing to that group. HireAbility agreed with this recommendation and has updated the language.

## B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA).

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

### 1. THE VR SERVICES NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, INCLUDING:

#### A. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES AND THEIR NEED FOR SUPPORTED EMPLOYMENT;

##### Overview

The Rehabilitation Act (1973) as amended under the Workforce Innovation and Opportunity Act (WIOA) requires HireAbility 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 HireAbility annual State plan and strategic planning activities. The development of this needs assessment in partnership with HireAbility is one of the primary responsibilities of the SRC.

HireAbility and the SRC Performance Review subcommittee work on the Comprehensive Needs Assessment on an ongoing basis. The most recent assessment was completed in December 2023 and submitted to RSA. This report includes data from a variety of sources, including:

HireAbility’s Rehabilitation Services Administration (RSA) reporting database.

The United States Census Bureau, the American Community Survey

Social Security Administration data

Data from other State of Vermont Agencies including Developmental Services, Mental Health and Economic Services

Surveys of participants, partner agencies, and staff

Based on a review of all data sources Hire Ability and the SRC determined the following regarding the need for supported employment services.

The State of Vermont has a well-established infrastructure of supported employment services for adults with developmental disabilities through the Developmental Disabilities Services Division (DDSD) program, and adults with psychiatric disabilities through the Community Rehabilitation and Treatment (CRT) program. These programs are funded through the DDSD Medicaid Waiver and CRT Medicaid case rate, respectively. Participation in these programs is limited to individuals who meet the eligibility requirements for the CRT and DDSD programs. For DDSD services, an individual must meet the DDSD System of Care Priorities in addition to receiving Medicaid Waiver services.

HireAbility also supports the JOBS supported employment program for youth. The JOBS program is a partnership between the Departments of Corrections (DOC), Mental Health (DMH), Children and Families (DCF), and HireAbility to provide supported employment and case management services for at-risk youth with emotional and behavioral disabilities.

However, HireAbility and the SRC determined there are two populations who may need supported employment but do not currently have access to the service. The primary reason is the lack of funding for extended services.

#### Individuals with Traumatic Brain Injury (TBI)

According to the Vermont Brain Injury Association, an estimated 9,000 Vermonters are recovering from brain injuries. TBI is associated with long-term unemployment. Based on field experience, HireAbility believes a major barrier is lack of access to long-term case management and employment supports. Some individuals with TBI experience similar barriers to maintaining employment as people with psychiatric disabilities and developmental disabilities. We believe individuals with TBI may need ongoing supported employment services to gain and maintain employment. However, there is currently no source of funding in Vermont for ongoing supported employment for this population.

#### Individuals with Psychiatric Disabilities Served through Community Mental Health Outpatient Services

The CRT program has evidence-based supported employment services available for adults with psychiatric disabilities. However, individuals served through outpatient services have no access to supported employment. This is despite the fact that some outpatient participants have very similar barriers and levels of need as those served in the CRT program. HireAbility is unlikely to effectively support these individuals without a long-term supported employment option. In 2019, HireAbility submitted a grant application to the Substance Abuse and Mental Health Services Administration (SAMSHA) to implement supported employment for this population. Unfortunately, the application was not funded. HireAbility continues to explore options to implement a supported employment program for this population.

#### B. INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES AND INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

The ACS provides data on disability and race by state. Overall, 3.71% of Vermonters are from an ethnic minority. The following table shows the ACS estimates of the incidence of disability by race.

#### Incidence of Disability by Race to Adults Ages 18 to 64

Total Number of Working Age Percentage Reporting a Disability Estimated Potential VR Eligible Participants

White- 356,313	13.5%	48,161
Black/African Americans- 5,133	11.4%	586
Asian-7,540	4.2%	313

The disability rates for African Americans and Asians in Vermont are much lower than the national 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 understate the actual rate of disability in these groups.

HireAbility closures for individuals from an ethnic minority increased from 8% in 2019 to 12% in 2022. This data suggests that HireAbility is serving individuals from ethnic minorities at a comparable rate to white individuals. Regardless as will be noted in the goals and priorities section of the plan, we are undergoing a major commitment to Diversity, Equity, Inclusion and Access (DEIA) work over the next two years.

#### C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE WORKFORCE DEVELOPMENT SYSTEM; AND

HireAbility and DOL have a strong history of collaboration around serving individuals with disabilities. HireAbility and DOL cooperate at the local level to serve individuals on mutual caseloads, and in some districts, HireAbility and DOL are co-located. HireAbility Regional Managers routinely meet with their local DOL counterparts. DOL staff sit on HireAbility-led Workforce Development teams that coordinate outreach to local employers. HireAbility counselors and DOL staff frequently share the cost of training programs and other return-to-work activities for individual participants. DOL staff have also consulted with HireAbility and the state Assistive Technology Program about accessibility for DOL programs and services

#### D. YOUTH WITH DISABILITIES, INCLUDING STUDENTS WITH DISABILITIES AND THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER IDEA.

##### HireAbility Pre-Employment Transition Services

Once the Pre-ETS requirement was announced in October 2014, Vermont HireAbility moved quickly to come into compliance. To meet the new mandate, HireAbility created a cadre of HireAbility counselors who work exclusively with high school students. Currently, HireAbility has 23 full time Transition Counselors, and two half time Transition Counselors for a total of 25 employees/positions or 24 FTEs, out of a total of 69 FTE counselors across the entire organization. This is approximately 36% of HireAbility's counselor capacity.

HireAbility Transition Counselors providing Pre-ETS are deployed statewide to serve all 60 supervisory unions in the state. HireAbility Transition Counselors are outposted to an average of five high schools each, to ensure statewide access for eligible students. The daily presence of counselors in local high schools allows them to build strong working relationships and coordinate services with school staff.

HireAbility also contracts with our primary CRP, VABIR, to support 26 Youth Employment Specialists to provide Pre-ETS. The school-based counselors and Youth Employment Specialists essentially work as a team. The focus of the Youth Employment Specialists is workplace readiness training, arranging for work-based learning experiences and instruction in self-advocacy.

HireAbility constantly evaluates the effectiveness of our program to ensure it provides high quality services to our participants.

As part of HireAbility's ongoing review and evaluation, it came to our attention that the attrition rate for youth exiting high school was much higher than older participants. The service model was set up so that youth in high school shifted from working with a Transition Counselor while they were in high school, to an Adult Counselor at high school exit. This shift from one counselor to another seemed to result in a disproportionate number of youth disengaging from the program at graduation. In an effort to reduce this number, HireAbility shifted the service delivery model in 2021, to allow Transition Counselors to keep youth on their caseloads through high school exit and up to age 25. Students who graduated in June 2021 were among the first to remain working with their Transition Counselors post-graduation.

#### The Number and Proportion of Students Receiving Pre-ETS Services and/or HireAbility Services

The number of students receiving Pre-ETS and/or HireAbility services saw a steady increase from SFY 2016 to SFY 2019, then a significant drop in SFY 2020 as seen in Table 9. We attribute this sharp decline in students served almost entirely to the pandemic. Schools were closed and Transition Counselors had an extremely difficult time getting in contact with students and school staff alike.

#### Students with Disabilities Served, Age 14 through 21 at Referral

##### Period Students Served

SFY 2016 1,672

SFY 2019 2,348

SFY 2020 1,723

SFY 2021 1,288

SFY 2022 1,421

During the 2021/2022 school year, 1,421 students with disabilities were enrolled in Pre-ETS and/or HireAbility services out of a potentially eligible population of 6,423. This means 22.1% of potentially eligible students were receiving Pre-ETS and/or HireAbility services during the school year.

#### Pre-ETS Services Provided by Category

##### Pre-ETS Services by Category (SFY 2022)

##### Pre-ETS Service Number of Students Receiving Service

Career Exploration	1,081
Post-Secondary Enrollment Assistance	912
Self-Advocacy Skills Training	183
Work Based Learning	242



We believe the above table significantly underreports the actual services provided because of the challenges involved in collecting this data in the AWARE case management system. HireAbility has already made a shift in its data reporting and collection methodology and will continue to monitor and improve data collection to develop a more accurate picture of services provided.

#### Supported Employment Services for Youth

In addition to core HireAbility services, HireAbility 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 (Serious Emotional Disturbance) who have left or dropped out of school. The program is voluntary and uses work as the primary 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 HireAbility, Mental Health, Corrections, and the Department for Children and Families.

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 misuse, and probation and parole.

#### Supported Employment for Youth with Developmental 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 HireAbility to help youth with developmental disabilities find employment before they exit high school.

HireAbility and DDSD collaborate to identify students who have a developmental disability and are likely to graduate. The June Graduates survey assists DDSD and HireAbility to effectively plan for transitioning students district by district. It also allows DDSD to predict caseload funding needs statewide.

HireAbility 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, Think College and College Steps. In general, HireAbility funds tuition and ancillary supports and DDSD funds staffing costs.

#### The Number and Proportion of Youth Receiving HireAbility Services

Transition and Pre-ETS naturally overlap to a significant degree. As noted, the HireAbility Transition Counselors have shifted to serving youth in high school and after graduation up to age 25 in partnership with the contracted VABIR Youth Employment Specialists. Table 11 shows the trends in the number of youth with disabilities served between SFY 2018 and SFY 2022. The total number of youth served by HireAbility has decreased significantly since 2018, which again is mainly attributed to the impacts of the pandemic.

#### Youth with Disabilities Served, Age 14 through 24 at Referral

Period	Persons Served
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SFY 2018	3,721
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SFY 2019	3,726
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SFY 2020	3,109
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SFY 2021	2,667
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SFY 2022	2,878
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Based on the ACS data, HireAbility estimates there were 12,991 youth with disabilities between the ages of 14 and 25 in the state of Vermont in 2022. HireAbility served 2,878 youth with disabilities during SFY 2022. This suggests that HireAbility is serving up to 22% of the eligible population.

HireAbility coordinates 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 HireAbility have agreed to meet quarterly to discuss the coordination of services within local school districts. In general, those meetings include the following:

- The HireAbility Director.
- The HireAbility Transition Program Manager.
- The AOE Special Education Director.
- The AOE Postsecondary and Transition Coordinator.

In addition to the above, HireAbility and AOE have frequent ad hoc meetings related to transition services and to plan joint initiatives.

#### LOCAL LEVEL

A primary responsibility of the HireAbility Transition Counselor is to coordinate services with the schools. HireAbility 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 HireAbility Transition Counselors and school staff to build close and collaborative working relationships.

In order to improve transition outcomes for students, HireAbility took the lead in forming core transition teams in all twelve districts in 2016. The purpose of the core transition team is to bring HireAbility, schools, and community agencies together to improve collaboration around services for transitioning students. The core teams include:

- Local school staff.
- HireAbility.
- Developmental services providers.
- Children’s and adult mental health providers.
- The Department of Labor youth staff.
- Other youth programs.

The core transition teams are well established in all twelve HireAbility districts and meet at least quarterly. HireAbility, AOE, and DOL also sponsor an annual core team event pulling together schools, community agencies, and state staff to focus on improving transition services. In 2023, over 250 people attended the event.

## SUMMARY FINDINGS

### Strengths of the Vermont System

- Overall, the number of youth with disabilities accessing HireAbility services appears to be rebounding post-pandemic. Transition teams have returned to serving youth in person, in schools which we know makes a huge difference in the quality of service delivery.
- HireAbility 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 HireAbility 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.
- Vermont has well-established core transition teams in all twelve HireAbility districts to facilitate local coordination of transition services.

### Areas for Development in the Vermont System

- Increasing the number of eligible youth served to pre-pandemic rates is a huge focus for HireAbility in the coming years. The earlier HireAbility can engage with these students, the more likely they are to engage in work-based learning activities which are shown to significantly increase the likelihood of youth entering competitive integrated employment post-high school.
- 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.

Despite this fact, only 24% of out of school youth are participating in such programs. HireAbility should develop strategies to expand opportunities for youth.

- Related to the above area of need, very few youth served by HireAbility access apprenticeship or other “earn and learn” programs leading to credentials. Apprenticeship and similar programs have an excellent track record of helping youth achieve higher wage employment.

## 2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

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 HireAbility program, except for supported employment. VABIR has capacity to serve HireAbility participants statewide and has an excellent track record. VABIR also serves individuals without disabilities through the state TANF program.

HireAbility provides contracts 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 HireAbility is open to supporting the development of new CRPs as well as established CRPs who come to Vermont, there is limited funding available to support multiple agencies.

### C. GOALS, PRIORITIES, AND STRATEGIES

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State’s performance under the performance accountability measures of Section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107 of the Rehabilitation Act. VR agencies must—

#### 1. DESCRIBE HOW THE SRC AND THE VR AGENCY JOINTLY DEVELOPED AND AGREED TO THE GOALS AND PRIORITIES AND ANY REVISIONS; AND

HireAbility and the SRC have established goals and priorities, as well as targets, for Program Years 2024 and 2025. These are based on the HireAbility/SRC Needs Assessment completed in 2023, and in response requirements included in the Workforce Innovation and Opportunities Act (WIOA), particularly the Common Performance Measures. All HireAbility goals and priorities are established within the Division’s long-established strategic themes:

- Organizational Effectiveness
- Valued and Empowered Employees
- Prepared Job Seekers
- Collaborative Partnerships

2. IDENTIFY MEASURABLE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS AND THE BASIS FOR SELECTING THE GOALS AND PRIORITIES (E.G., CSNA, PERFORMANCE ACCOUNTABILITY MEASURES, SRC RECOMMENDATIONS, MONITORING, OTHER INFORMATION). AS REQUIRED IN SECTION 101(A)(15)(D), (18), AND (23), DESCRIBE UNDER EACH GOAL OR PRIORITY, THE STRATEGIES OR METHODS USED TO ACHIEVE THE GOAL OR PRIORITY, INCLUDING AS APPLICABLE, DESCRIPTION OF STRATEGIES OR METHODS THAT—

A. SUPPORT INNOVATION AND EXPANSION ACTIVITIES;

B. OVERCOME BARRIERS TO ACCESSING VR AND SUPPORTED EMPLOYMENT SERVICES;

C. IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POST-SECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES); AND

D. IMPROVE THE PERFORMANCE OF THE VR AND SUPPORTED EMPLOYMENT PROGRAMS IN ASSISTING INDIVIDUALS WITH DISABILITIES TO ACHIEVE QUALITY EMPLOYMENT OUTCOMES.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

**1. HireAbility will continue to align services to support participants in achieving the WIOA Common Performance Outcome Measures.**

HireAbility is a strong supporter of the WIOA Common Performance Measures. We believe the measures support participants in their career goals and promote higher wages and more sustainable employment. However, the WIOA measures are extremely lagging, meaning most of the desired outcomes occur well after services end. For example, the measure of median earnings occurs two full quarters after case closure. As a result, the measures are not very useful in guiding the work of frontline staff on a day-to-day basis. Therefore, in 2020 HireAbility established leading measures expected to improve the longer-term WIOA outcome measures. These measures are visible to all staff in real time through a Dashboard. Since the implementation of the Dashboard HireAbility has seen considerable improvement in both the leading measures and the Common Performance Measures. In 2023, HireAbility updated the leading measures based on field experience and made the targets more ambitious and aspirational. We also included some intermediate performance outcome targets. The following is a list of the leading measures and outcome targets and how they are expected to positively impact the lagging outcome measures:

The Leading Measures

**Sustained Teaming:** The involvement of other team members (employment placement staff, Certified Work Incentive Counselors, and others) over the life of the case strengthens participant engagement in completing their employment goals. This measure assesses whether multiple team member are engaged with the participant throughout the life of the case.

Target: 30% of all cases will show sustained teaming. This measure was set at a relatively low level for PY 24 because it is new. We expect to increase it as we collect data on the state averages.

Career Assessments: The use of career assessment tools supports exploration and better matches between consumers and higher wage and higher skill employment options. High quality career assessment tools can help participants identify meaningful career pathways.

Target: 50% of participants will receive career assessments

Credential Focused Education and Training: Education and training are the best options we can provide to help participants achieve high wage and high-quality careers. Even relatively short-term training programs can dramatically increase a participant's earning levels.

Target: 35% of participants will enroll in credential focused education and training

Work-Based Learning Experiences: Paid work experiences are often a highly effective way of introducing participants with little or no work experience to employment. This includes students and youth as well as adults who have been out of the workforce for extended periods of time. Paid Work Experiences offer a low-risk way for participants to take the first step towards competitive employment. Paid Work Experiences can also be an effective way for participants to explore new career pathways before they commit to credentialed training. For example, a participant interested in HVAC training might use a work experience to determine if it is a good career match.

Target: 25% of participants will engage in Paid Work Experiences

High Wage Plan Goals: The participant and the counselor set the employment goal in the plan. Participants sometimes have low expectations of what is possible or have never considered higher wage career goals. Vocational counselors encourage participants to consider higher wage plan goals in occupations they may have never considered.

Target: 50% of participants will have higher wage plan goals. Higher wages are defined as 150% of minimum wage or better.

Sustained Follow Up: Continued support and encouragement after job placement results in better job retention and career advancement.

Target: 50% of participants will receive sustained follow up after job placement.

#### Intermediate Outcome Targets

The following intermediate target outcomes help the counselor and HA management determine if the leading measures are resulting in improvements.

Credentials Earned: What percentage of participants who were enrolled in a credentialed training program achieved one or more related credentials.

Target: 50% of participants enrolled will achieve a credential

Rehabilitation Rate: This is the percentage of cases closed with an employment outcome compared to cases closed with no verified employment outcome.

Target: 55% of participants will achieve an employment outcome

Participants Earning 150% of Minimum Wage or better: This is the percentage of participants who were closed with an employment outcome who are earning 150% of minimum wage or better.

Target: 35% of participants closed with an employment outcome will earn 150% of minimum wage or better.

**2. HireAbility will increase participant opportunities to engage in post-secondary education and training and gain industry recognized credentials.**

Post-secondary credentials are a proven mechanism for participants to access higher wage employment and meaningful careers. In Program Year 2021, 559 participants were enrolled in programs potentially leading to a credential, and 121 participants completed a program and earned a credential. In Program Year 2022, 626 participants were enrolled in programs potentially leading to a credential, and 156 participants completed a program and earned a credential. HireAbility seeks to continue to increase participation in Program Years 2024 and 2025.

Targets

Program Year 2024 Target: 700 HireAbility participants will enroll in training leading to a credential and 170 HireAbility participants will achieve a credential.

Program Year 2025 Target: 800 HireAbility participants will enroll in training leading to a credential and 200 HireAbility participants will achieve a credential.

**3. HireAbility will expand opportunities for participants to enroll in Registered Apprenticeships.**

Registered Apprenticeships are a proven strategy for job seekers to enter and succeed in high wage and high demand fields. Registered Apprenticeships also pay a wage to enrollees while they get trained. However, HireAbility participants have not enrolled in apprenticeship programs historically. HireAbility will be implementing several strategies to increase participant enrollment in apprenticeship programs. Because we are starting from a low baseline, the targets for PY 24 and PY 25 are relatively modest.

Targets

PY 2024 Target: 10 HireAbility participants will be enrolled in Registered Apprenticeships

PY 2025 Target: 20 HireAbility participants will be enrolled in Registered Apprenticeships

**4. HireAbility will improve outcomes for students and youth with emotional/behavioral disabilities served through the JOBS Supported Employment Program.**

The JOBS program was first launched in one site in 1993. Between 1993 and 2005 HireAbility, in partnership with the Department of Mental Health (DMH), expanded the JOBS model statewide. However, in recent years HireAbility and DMH have observed a decline in program services and outcomes with some of the programs. To address this decline HireAbility has or will be implementing the following strategies:

- **Fee for Benchmark Contracting:** A new fee for benchmark contract structure that funds the program based on outcomes versus services. Such “value based” contracting has been demonstrated to improve outcomes and increase program accountability.
- **Centralized Case Management:** HireAbility has observed substantial inconsistencies in how designated vocational counselors manage the JOBS caseloads. This has affected participant services, data quality and program accountability. To address this HireAbility has implemented centralized case management with two Senior Vocational Counselors managing the caseload statewide.
- **JOBS Dashboard:** The JOBS Dashboard will be developed to support the JOBS program staff in tracking their activities and work with HireAbility participants. It will be a tool to help the vocational counselors and JOBS staff monitor outcomes and assist with reporting and fee for benchmark invoicing. Using real-time data from Aware case management system records, the JOBS Dashboard will display only the most relevant JOBS program information in a concise and easy-to-use way. It will be designed to streamline effective coordination of JOBS program services, enhance case management between partners, and facilitate complete and accurate data collection.

#### Targets for PY 2024 and PY 2025

Because HireAbility has radically changed the program outcome measures as defined in the fee for benchmark contract we do not have historic data to set targets. Therefore PY 24 and PY 25 will be baseline years to collect benchmark data. The fee for benchmark measures are as follows:

- Completion of career assessment
- Participation in Paid Work Experiences (PWE)
- Placement in competitive employment
- Supported employment post placement\Employment stabilization
- Supported employment closure and earnings level at closure
- Extended Employment post closure

#### **5. HireAbility will continue to expand efforts to effectively serve employers under our new branding.**

Employer engagement continues to be a critical activity to ensure participants have access to employment opportunities and careers. Creative Workforce Solutions (CWS) was the employer engagement and marketing arm under our old name of Vocational Rehabilitation. In 2021 we implemented a rebranding that pulled all our marketing under a single name, HireAbility. This involved a redesign of all our marketing materials including those for employers. It also included a media campaign using television, radio, and social media. The HireAbility branding has been very well received by the employer community.



The Business Account Managers (BAMS) are the primary employer engagement staff for HireAbility. They are deployed in all 12 district offices. HireAbility measures employer engagement through the following metrics:

- New Employer Contacts: These are defined as new contacts with employers who have never engaged with HireAbility.
- Employer Activities: These are defined as engagement activities with employers who have an ongoing relationship with HireAbility.
- Employer Opportunities: These are defined as specific participant opportunities such as a job opening, training opportunity, work-based learning opportunity, company tour or informational interview.
- Caseload Driven Outreach: Caseload driven outreach is defined as labor market outreach directly related to participants on counselors' current caseloads. Business Account Managers are tasked with directing two-thirds of their activities to caseload needs.

In Program Year 2022, the counts for the above activities were as follows:

- New Employer Contacts: 1,573
- Employer Activities: 3,587
- Employer Opportunities: 2,194
- Caseload Driven Outreach: 776

The annual targets for these activities for Program Years 2024 and 2025 are as follows:

- New Employer Contacts: 1,600
  - Employer Activities: 3,700 distinct engagement activities
  - Employer Opportunities: 2,400 discrete participant opportunities developed
  - Caseload Driven Outreach: 900 distinct participant opportunities developed
6. **HireAbility will continue to seek opportunities to expand and/or improve services for underserved populations including individuals who need supported employment.**

HireAbility recognizes that there continue to be Vermont populations with disabilities that are unserved or underserved. These include, but are not limited to:

- Individuals with severe disabilities who need supported employment services are not eligible for long term supports through the Division of Developmental Services or the Department of Mental Health.
- Individuals with disabilities who are offenders and are transitioning into the community.
- Individuals with substance misuse disorders.
- Survivors of traumatic brain injuries.

As it has nationally, the opioid crisis has greatly impacted Vermont communities. HireAbility was successful in getting state funding to implement two pilots to serve individuals in recovery from substance misuse disorders. It is still early but the pilots have shown great promise. HireAbility continues to partner with the Department of Corrections to serve offenders with disabilities. We have a dedicated counselor who works with individuals in the facilities prior to release. Eligible individuals are then referred to designated counselors in their home communities.

**7. HireAbility will continue to track participant satisfaction with the program's services through the bi-annual consumer satisfaction survey.**

Participant satisfaction is a critically important metric for HireAbility. The HireAbility Consumer Experience Survey is conducted every two years to determine participants' overall satisfaction with the program. The survey is conducted by a third-party research firm, Market Decisions Research (MDR), which has an extensive background working with VR agencies nationwide. 646 participants were contacted for our 2022 survey. The results have provided HireAbility with valuable information regarding participants' reactions to remote and hybrid services. The following are highlights from the 2022 results:

- 81% of participants reported they were satisfied or very satisfied with HireAbility.
- 93% said that they would recommend that their friends or family members seek help from HireAbility.
- 90% of participants responded that they are satisfied with their experiences working with HireAbility staff and counselors. This is a two percent increase from our 2016 survey.
- 97% felt they were treated by staff with dignity and respect.
- 77% of participants reported that it was very easy or somewhat easy to connect with their counselor, even during the times where services were being delivered entirely remotely.
- 63% of participants reported that they would like to continue to receive services remotely.

HireAbility will continue to track participant satisfaction every two years to observe trends and identify areas for improvement. HireAbility will conduct a survey in PY 25.

Targets for PY 25:

- At least 96% of participants will report they would recommend HireAbility to family and friends.
  - At least 90% will report they were satisfied or very satisfied with their experience working with HireAbility staff and counselors.
- 8. HireAbility will become an organization where; All staff and participants have a sense of belonging & feel welcomed here at HireAbility. Our diverse staff reflect the communities that we serve. Our strong connections with multicultural**

**communities and community partners ensures engagement, successful outcomes, and career pathway opportunities for participants from diverse backgrounds.**

The above statement is our vision for HireAbility and our commitment to Diversity, Equity, Inclusion and Accessibility (DEIA). To make this vision a reality, HireAbility worked with a consultant to conduct a needs assessment to identify areas of opportunity and growth. Based on the results, we have identified four areas of focus, and have formed four charter groups made up of diverse cross-sections of staff to do this work in PY 24 and PY 25. The work of each charter groups is as follows:

- Develop a workforce that reflects the diverse populations we serve.
- Effectively reach all populations that are eligible for our services.
- Ensure staff have access to the tools and knowledge and feel able to serve all participants in a culturally responsive way
- Strengthen our existing communication loops to ensure staff are informed and can contribute.

The charter groups will be charged with developing strategies to move HireAbility forward in these areas. They will also help identify metrics for success that are meaningful and measurable.

**Strategies to Meet the Goals and Priorities**

HireAbility will implement a series of strategies to achieve the above goals and priorities. Each strategy is intended to help HireAbility achieve one or more of the above goals. The goals the Each strategy supports are listed below:

**Strategy 1: DVR will implement a series of initiatives to realign staff practices, services, and assignment of resources to meet the WIOA Common Performance Measures. Goals 1, 2, 3, 4 and 7.**

In order to maximize HireAbility outcomes under the WIOA Common Performance Measures, HireAbility will implement or continue to implement the following:

DVR will utilize the HireAbility Dashboard to track leading case practice indicators that we believe will result in improved outcomes. The five primary lead indicators are:

- Sustained teaming cases with other staff and partners
- Participation in career assessments
- Participation in credentialed post-secondary education and training
- Participation in paid work experiences
- Setting higher wage career goals
- Sustained follow up post-employment

HireAbility will also track intermediate measures of progress including:

- Percentage of participants enrolled in a post-secondary program who achieve a credential.
- Percentage of participants who achieve a successful employment outcome at closure
- Percentage of participants earning 150% of minimum wage at closure

Managers will use the dashboard data to inform their supervision of staff. It will help direct training and support efforts. We also expect the dashboard data to be included in staff evaluations.

Moving forward, every step of the rehabilitation process will message and support the HireAbility commitment to careers. HireAbility casework practices will support serving participants more than once, or for a longer period, as they embark on their journey towards a sustainable career. HireAbility will continue to implement a follow up system for reaching out to participants after job placement, to offer support and assistance with opportunities for promotion or additional education and training.

- All staff will be trained to support long term career goals and HireAbility counselors will provide long term aspirational career counseling.
- Motivational Interviewing (MI) coaches will facilitate coaching circles that support counseling using MI strategies.
- All DVR staff will be trained to interpret the results of vocational and career assessments and tie the results to the trends in their local labor market.
- 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 participants about possible career paths, based on assessments.
- BAMs (Business Account Managers) will understand the career paths in the businesses they serve.
- BAMs will understand the needs of the local labor market and communicate them back to HireAbility staff so that counselors can help participants choose career goals that are in-demand in their communities.

**Strategy 2: Expand post-secondary training and education opportunities that result in higher wage job opportunities for HireAbility participants through partnerships with providers, financial support, and the Disability Innovation Fund (DIF) Grant, Vermont Career Advancement Project (VCAP). Goals 1, 2, 3 and 5.**

High-wage, high-demand employment opportunities often require some type of post-secondary credential. Ensuring that these types of post-secondary training and education opportunities are available and accessible to HireAbility participants is incredibly important. However, we know that a high proportion of HireAbility participants come to the program initially unwilling or unable to pursue post-secondary training or education. Often this is because they need to work due to financial necessity. They may also have had bad experiences in school and feel they

are not able to succeed in those settings. HireAbility is and will continue to implement the following strategies to increase participation in post-secondary education and training:

- Providing financial support: Most HireAbility participants are low income. Many cannot stop working to participate in education and training programs. Therefore, HireAbility will provide financial support for participants while they are enrolled in post-secondary programs. Based on our experience to date this additional support is helping more HireAbility participants enroll in credentialed programs.
- Partnership with training and education providers: HireAbility participants often need greater support than participants without disabilities in completing credentialed programs. To support HireAbility participants, we must have strong partnerships with the local workforce providers including the State College and Community College systems. Through our DIF funded Vermont Career Advancement Project (VCAP), we have formalized our partnerships with the major workforce training providers in the state. This includes funding training cohorts of HireAbility participants. It also includes embedding contracted staff within the Community College of Vermont (CCV) and Vermont State College (VSC) who will provide a supportive on ramp into programming for HireAbility participants.
- Using the VCAP Grant as catalyst for systems change: Promoting post-secondary training and education across the HireAbility program requires both a change in practice and culture. VCAP is designed to be a practice laboratory for counselors to implement a new approach to their work. In 2021 VCAP deployed six Career Pathway Navigators to implement a set of practices focused on helping participants access and succeed in post-secondary programs. In 2022 we expanded the number of Career Pathway Navigators to 14 to integrate the new practice into all offices. By the end of the VCAP we expect all vocational counselors will have integrated this new approach into their practices.

**Strategy 3: Coordinate efforts with the Agency of Education (AOE) and the Vermont Department of Labor (VDOL) to ensure individuals with disabilities have access to other components of the workforce system. Goals 1, 2, 3, 4 and 6.**

DVR will continue to work closely with VDOL and AOE to ensure HireAbility participants have access to all the workforce development opportunities available in their communities. HireAbility will be implementing several strategies to make this happen including the following:

HireAbility DVR and VDOL Regional Managers will continue to have joint meetings at the statewide level and local level to facilitate coordination of services.

- HireAbility, AOE and VDOL will implement systems to track and manage co-enrollment in each program.
- HireAbility, will pursue actual or virtual co-location of HireAbility and VDOL staff.
- HireAbility, with the support of AOE, will develop stronger partnerships with the local Technical Educational Centers and Adult Basic Education programs.

**Strategy 4: Expand employer outreach and engagement efforts through our new branding to effectively meet the needs of employers. Goals 1, 2, 3, 4, 5, and 7.**

In order to help participants connect with employment opportunities that meet their career goals, engaging businesses in the local labor market is a top priority of HireAbility. The HireAbility branding has been very well received by employers. The Business Account Managers are HireAbility's primary connection to the business community. They lead employment teams in each district that are designed to coordinate employer engagement. We will use the following strategies to maintain and expand on our employer relationships:

- Targeted HireAbility marketing through social media and traditional media.
- Seeking opportunities to coordinate employer engagement with the Vermont Department of Labor.
- Analyzing Salesforce account management data to determine if there are industry sectors that are underrepresented.
- Increasing engagement of underrepresented sectors in partnership with local employers.
- Building on and expanding employer events such as job fairs, employer breakfasts and business recognition events designed to engage employers.
- Identifying training opportunities that meet the needs of local employers and can be offered to HireAbility participants.
- Utilizing local pipeline reports to do caseload driven outreach that will better connect employers and participants.

**Strategy 5: Develop and implement strategies to increase the number of participants enrolled in Registered Apprenticeship Programs (RAP). Goals 1,2,3, 5 and 7.**

HireAbility has made a major commitment to expanding RAP opportunities for participants as part of the VCAP. RAPs are a highly effective mechanism to support participants in achieving industry recognized credentials while employed. They also lead to high wage and high quality careers. To make RAPs accessible, HireAbility is or will be implementing the following strategies:

- Formalize our partnership with VDOL, the state RAP agency, to facilitate the development of new RAPs outside the traditional trades.
- Become a formal RAP Intermediary to support the establishment of RAPs by employers. Businesses, especially smaller ones, are often concerned with the paperwork and rules around RAPs. Intermediaries, can take care of much of the paperwork and make it much easier for employers to participate.
- Develop our partnerships with the organizations that provide the required related instruction for RAPs. These include the Career and Technical Education Centers (CTE), VSC, and CCV.

- Develop guidance and how-to tools for HireAbility staff and BAMs around setting up RAPs with local employers.
- Develop a support infrastructure for staff around setting up and implementing RAPs.

**Strategy 6. Continue to explore ways to develop and expand services for underserved populations including individuals who require supported employment through partnerships and grant and funding opportunities. Goals 6, 7 and 8.**

HireAbility will be implementing the following strategies to meet the needs of underserved populations.

**Individuals with Opioid Misuse Disorders**

Vermont, like many states has been hit hard by the opioid epidemic. In response, HireAbility launched two pilots to specifically serve individuals in recovery from opioid misuse disorders. The State legislature provided funding to support the pilots for two years. In recognition of the complexity involved in serving individuals with opioid dependence disorders, the pilot uses a wraparound approach designed to address all the barriers that can undermine employment. The core members of the team are as follows:

- **The Vocational Counselor (VC):** The VC is the lead case manager for the team. The VC works with the participants to assess their skills and interests and develop an Individual Plan for Employment (IPE). The VC will support the participant in exploring career pathways beyond entry level employment. The VC has a case service budget that can be used to pay for credentialed training and education, transportation, work clothes and other support needs. The VCs working on this project have backgrounds in substance misuse disorders including lived experience.
- **The Employee Assistance Program (EAP) Clinician:** The EAP clinician’s role is to help the participant address all the issues that might undermine their employment goals. Examples are lack of stable housing, access to treatment, strategies to avoid relapse, and dealing with legal issues.
- **The Employment Consultant (EC):** The EC provides direct support to the participant in their job search. They are employees of VABIR, the community agency supported through an HA contract. ECs can contact employers directly on the participant’s behalf or help the participant make those connections themselves. They can help with resume development and interview preparation. They are also there to support the participant through decisions about whether to disclose the substance misuse disorder or other disabilities.

It is our hope that the pilots will produce outcomes to support continuation and replication across the state. This will be the focus of our efforts in PY 24 and PY 25.

**High school students with developmental disabilities who need supported employment**

The State of Vermont Developmental Services System has a robust program that guarantees students who exit with employment will receive supported employment services. However, many students with developmental disabilities exit high school without employment. As a result, they are placed in community-based services and do not have the opportunity to go to

work. To address this issue, HireAbility is using reallocation funding to support four in-school pilots serving students with developmental disabilities. The intent is to provide early work experiences and competitive supported employment opportunities for students while they are in school. The goal is to make sure students exit high school, employed. The provider agencies are the designated developmental services providers. This will facilitate a smooth transition to ongoing supported employment services after high school exit.

Adults with psychiatric disabilities who need supported employment services

The Vermont Department of Mental Health funded supported employment services are likely to go through a major transition in PY 24 and PY 25. Historically the programs have not served adult outpatient participants who often require supported employment services. Our hope is that this will change in the transition. This will allow HireAbility to partner with DMH and the provider agencies to provide supported employment to this underserved population.

**Strategy 7. Four HireAbility charter groups will develop specific strategies to meet our DEIA vision. Goal 7 and 8.**

Our Vision Statement is: HireAbility will become an organization where; All staff and participants have a sense of belonging & feel welcomed here at HireAbility. Our diverse staff reflect the communities that we serve. Our strong connections with multicultural communities and community partners ensures engagement, successful outcomes, and career pathway opportunities for participants from diverse backgrounds.

To make this vision a reality, HireAbility worked with a consultant to conduct a needs assessment to identify areas of opportunity to grow. Based on the results, we have identified four areas of focus, and have formed four charter groups made up of diverse cross-sections of staff to do this work in PY 24 and PY 25. The goals of each charter groups are as follows:

- Develop a workforce that reflects the diverse populations we serve.
- Effectively reach all populations that are eligible for our services.
- Ensure staff have access to the tools and knowledge and feel able to serve all participants in a culturally responsive way
- Strengthen our existing communication loops to ensure staff are informed and can contribute.

The charter groups will be charged with developing strategies to move the agency forward in these areas. HireAbility is working with a consultant, Karen Proctor, to help us create and support a culture that is diverse and welcoming to all. This work is expected to be ongoing.

**Strategy 8. HireAbility will implement a series of strategies to improve services and outcomes through the JOBS supported employment programs: Goals 4, 7 and 8.**

HireAbility is implementing a major program improvement effort for the JOBS programs. The JOBS program was first launched in one site in 1993. Between 1993 and 2005 HireAbility, in partnership with the Department of Mental Health (DMH), expanded the JOBS model statewide. However, in recent years DVR and DMH have observed a decline in program services and



outcomes with some of the programs. To address this decline HireAbility has or will be implementing the following strategies:

- **Fee for Benchmark Contracting:** Implementing a new fee for benchmark contract structure that will fund the program based on outcomes versus services. Such “value based” contracting has been demonstrated to improve outcomes and increase program accountability.
- **Centralized Case Management:** HireAbility has observed substantial inconsistencies in how designated vocational counselors manage the JOBS caseloads. This has affected participant services, data quality and program accountability. To address this HireAbility has implemented centralized case management with two Senior Vocational Counselors managing the caseload statewide.
- **JOBS Dashboard:** The JOBS Dashboard will be developed to support the JOBS program staff in tracking their activities and work with HireAbility participants. It will be a tool to help the vocational counselors and JOBS staff monitor outcomes and assist with reporting and fee for benchmark invoicing. Using real-time data from Aware case management system records, the JOBS Dashboard will display only the most relevant JOBS program information in a concise and easy-to-use way. It will be designed to streamline effective coordination of JOBS program services, enhance case management between partners, and facilitate complete and accurate data collection.

#### D. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

##### 1. PROGRESS IN ACHIEVING THE GOALS AND PRIORITIES IDENTIFIED FOR THE VR AND SUPPORTED EMPLOYMENT PROGRAMS;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

The following items were the Goals and Priorities identified in the 2022 State Plan Update.

1. HireAbility will align services to support participants in achieving the WIOA Common Performance Outcome Measures.
2. HireAbility will increase the percentage of participants earning more than Vermont minimum wage at closure.
3. HireAbility will increase participant opportunities to engage in post-secondary education and training and gain industry recognized credentials.
4. HireAbility will improve outcomes for students and youth with emotional/behavioral disabilities served through the JOBS Supported Employment Program.
5. HireAbility will continue to expand efforts to effectively serve employers.

6. HireAbility will continue to seek opportunities to expand and/or improve services for underserved populations including individuals who need supported employment.
7. HireAbility will continue to track participant satisfaction with the program's services through the bi-annual consumer satisfaction survey.
8. HireAbility will evaluate how to deliver the most effective remote services to participants given the COVID-19 pandemic.
9. HireAbility will implement strategies to ensure cultural responsiveness and awareness for HireAbility staff, policies, and practices.

HireAbility has made substantial progress in meeting or exceeding the targets set in many of the areas identified in the Goals and Priorities. We are particularly pleased with the long-term trends and our performance under the Common Performance Measures. Below is a summary of our strategies and outcomes for PY 21 and PY 22.

### **1. HireAbility will align services to support participants in achieving the WIOA Common Performance Outcome Measures**

HireAbility is a strong supporter of the WIOA Common Performance Measures. We believe the new measures support participants in their career goals and promote higher wages and more sustainable employment. However, the WIOA measures are extremely lagging, meaning most of the desired outcomes occur well after services end. For example, the measure of median earnings occurs two full quarters after case closure. As a result, the measures are not very useful in guiding the work of frontline staff on a day-to-day basis. Therefore, HireAbility has established leading measures expected to improve the longer-term WIOA outcome measures. HireAbility has already seen improvement in some of the most meaningful and lagging Common Performance Measures since implementing them. The following is a list of the leading measures and how they are expected to positively impact the lagging outcome measures:

- Leading Measure One: The use of career assessment tools supports exploration of and better matches between participants and higher wage and higher skill employment options.
- Leading Measure Two: The involvement of other team members (employment placement staff, Certified Work Incentives Counselors, and others) strengthens participant engagement in completing their employment goals.
- Leading Measure Three: Career focused education and training leads to higher wage and higher quality employment and retention.
- Leading Measure Four: Vocational counseling with an emphasis on career focused plans will lead to higher wage and higher quality employment.
- Leading Measure Five: Continued support and encouragement after job placement results in better job retention and career advancement.

HireAbility established the targets below for individual counselor caseloads:

- 50% of cases will include use of career assessment tools to support exploration of higher wage and higher skill options.

- 50% of cases will involve other team members (employment placement staff, Certified Work Incentives Counselors, and others) to strengthen participant engagement in completing their employment goal.
- 35% of participants in plan status will be enrolled in career focused education and training that leads to higher wage and higher quality employment.
- 35% of participants in plan status will have plans aimed at achieving careers in higher wage employment.
- 75% of HireAbility participants will continue to be engaged in HireAbility services after job placement.

### **Program Year 2022 Update Actual Dashboard Data**

As noted, HireAbility uses the dashboard to track counselor performance in meeting these measures. The dashboard is updated at least weekly and is a point in time measure that looks back at the prior year's performance. The dashboard measures as of June 30, 2023 were as follows:

- 36% of cases included use of career assessment tools to support exploration of higher wage and higher skill options.
- 57% of cases involved other team members (employment placement staff, Certified Work Incentives Counselor, and others) to strengthen participant engagement in completing their employment goal.
- 25% of participants in plan status were enrolled in career focused education and training that leads to higher wages and higher quality employment.
- 65% of participants in plan status had plans aimed at achieving careers in higher wage employment.
- 79% of HireAbility participants continue to be engaged in HireAbility services after job placement.

Overall, the dashboard data is positive and moving in the right direction. However, the data suggests that we need to focus on increasing the number of participants enrolled in post-secondary credentialed programs and support staff with the use of career assessments. This is reflected in our Goals and Priorities for PY 24 and PY 25.

### **2. HireAbility will increase the percentage of participants earning more than Vermont minimum wage at closure**

HireAbility continued to focus on increasing wages at closure. We set the following targets for PY 22:

- 70% of HireAbility participants will earn at or above 110% of minimum wage at closure.
- 55% of HireAbility participants will earn at or above 125% of minimum wage at closure.

- 35% of HireAbility participants will earn at or above 150% of minimum wage at closure.

The actual outcomes for participants in PY 22 were as follows:

- Participants at or above 110% of minimum wage at closure: 77%
- Participants at or above 125% of minimum wage at closure: 57%
- Participants at or above 150% of minimum wage at closure: 53%

In Program Year 2022 HireAbility exceeded its goals for supporting participants to exit the program in higher wage employment. We expect this trend to continue as we assist more participants to enter credentialed training programs.

**3. HireAbility will increase participant opportunities to engage in post-secondary education and training and gain industry recognized credentials.**

HireAbility has seen a consistent increase in the number of participants in credentialed training/education programs and participants achieving credentials, from PY 18 to PY 22. There was a slight dip in participation in PY 20 coinciding with the pandemic, but the upward trend is clear. In PY 22, HireAbility achieved a 53.2% credential attainment rate under the Common Performance Measures compared to the national average of 37.6%.

Program Year	Number of Participants Enrolled in Credentialed Programs	Credentials Attained
2018	244	48
2019	566	148
2020	506	111
2021	559	121
2022	626	156

**4. HireAbility will improve outcomes for students and youth with emotional/behavioral disabilities served through the JOBS Supported Employment Program**

HireAbility planned to deploy a new performance-based contract in SFY 22 for all JOBS providers. However, after consultation with RSA and VR TAC we determined the contract structure and outcomes needed to be revised. We worked with VR TAC to develop a new contract structure that better reflected the desired supported employment outcomes. The new contract will be deployed statewide in FFY 24. The new benchmarks in the contract are:

- Completion of career assessment
- Participation in Paid Work Experiences (PWE)
- Placement in competitive employment

- Supported employment post placement
- Employment stabilization
- Supported employment closure and earnings level at closure
- Extended Employment post closure

To support the programs with the new contract structure we have centralized case management under two Senior Vocational Counselors.

### **5. HireAbility will continue to expand efforts to effectively serve employers**

HireAbility went through a major rebranding in 2020 and 2021. As part of that rebranding effort, we decided to retire Creative Workforce Solutions (CWS) and have all employer outreach activities under our new name, HireAbility. The Business Account Managers (BAMS) are the primary employer engagement staff for HireAbility. They are deployed in all 12 district offices. HireAbility measures employer engagement through the following metrics:

- **New Employer Contacts:** These are defined as new contacts with employers who have never engaged with HireAbility.
- **Employer Activities:** These are defined as engagement activities with employers who have an ongoing relationship with HireAbility.
- **Employer Opportunities:** These are defined as specific participant opportunities such as a job opening, training opportunity, work-based learning opportunity, company tour or informational interview.
- **Caseload Driven Outreach:** Caseload Driven outreach is defined as labor market outreach directly related to participants on counselors' current caseloads. Business Account Managers are tasked with directing two-thirds of their activities to caseload needs.

The annual targets in the PY 22 and PY 23 State Plan were:

- **New Employer Contacts:** 775 new contacts
- **Employer Activities:** 2,500 distinct engagement activities
- **Employer Opportunities:** 2,750 discrete participant opportunities
- **Caseload Driven Outreach:** 1,650 distinct participant opportunities developed based on caseload need.

**For PY 22 the actual counts were as follows:**

- **New Employer Contacts:** 1,573
- **Employer Activities:** 3,587
- **Employer Opportunities:** 2,194

- Caseload Driven Outreach: 776

We believe the high number of new employer contacts and activities was driven by the very tight labor market. More than ever, employers are willing to consider recruiting from HireAbility. We were somewhat disappointed by the lower number of employer opportunities and caseload driven outreach. We believe this was driven by our own workforce challenges recruiting and retaining BAM staff. Considerable turnover of BAMs has likely depressed these numbers.

## **6. HireAbility will continue to seek opportunities to expand and/or improve services for underserved populations including individuals who need supported employment**

HireAbility has had some considerable success in expanding services to underserved populations. Since the last State Plan Update. Most notably with the following populations:

### Individuals with Opioid misuse disorder

As it has nationally, the opioid crisis has greatly impacted Vermont communities. HireAbility was successful in getting state funding to implement two pilots to serve individuals in recovery from opioid misuse disorders. It is still early but the pilots have shown great promise.

### Offenders with disabilities

HireAbility is partnering with the Department of Corrections to serve offenders with disabilities. We have a dedicated counselor who works with individuals in the facilities prior to release. Eligible individuals are then referred to designated counselors in their home communities.

### Students with developmental disabilities in transition who need supported employment

The State of Vermont Developmental Services System has a robust supported employment program that guarantees students who exit with employment will receive supported employment services. However, many students with developmental disabilities exit high school without employment. As a result, they are placed in community-based services and generally do not have the opportunity to go to work. To address this issue, HireAbility is using reallocation funding to support four in school pilots serving students with developmental disabilities. The intent is to provide early work experiences and competitive supported employment opportunities for students while they are in school. The goal is to make sure students exit high school, employed. The provider agencies are the designated developmental services providers. This will facilitate a smooth transition to ongoing supported employment services after high school exit.

## **7. HireAbility will continue to track participant satisfaction with the program's services through the bi-annual consumer satisfaction survey.**

In the PY 22 and PY 23 State Plan Update, HireAbility set the following targets for participant satisfaction.

- At least 96% of HireAbility participants will report they would recommend HireAbility to family and friends.
- At least 92% will report they were satisfied or very satisfied with their experience working with HireAbility staff and counselors.

The following were the actual results for the survey conducted in 2022.

- 93% said they would recommend that their friends or family members seek help from HireAbility.
- 81% of participants reported they were satisfied or very satisfied with HireAbility.
- 90% of participants responded they are satisfied with their experience working with HireAbility staff and counselors. This is a two percent increase from our 2019 survey.
- 97% felt they were treated by staff with dignity and respect.

While we were slightly short of hitting our targets, the numbers are overwhelmingly positive, especially since this was the first survey since COVID.

### **8. HireAbility will evaluate how to deliver the most effective remote services to participants given the COVID-19 pandemic**

HireAbility shifted to a remote service delivery model in March of 2020 in response to the COVID-19 pandemic. Participant meetings and business outreach have been conducted by utilizing virtual meetings and telephone calls. Supporting HireAbility participants to obtain the necessary tools and technology to be able to actively engage in these virtual services has been a top priority. A set-aside fund was created to enable staff to support participants in purchasing the tools or services they need. As of November 1, 2021, HireAbility staff moved to a hybrid service delivery model working some days in the HireAbility offices and some days remotely.

In the 2022 participant satisfaction survey 77% of participants reported that it was very easy or somewhat easy to connect with their counselor, even during the times where services were being delivered entirely remotely. Overall satisfaction with our services remained very high through this crisis period despite all the challenges associated with serving participants during COVID.

### **9. HireAbility will implement strategies to ensure cultural responsiveness and awareness for HireAbility staff, policies, and practices**

In 2021 Governor Scott announced the following proclamation: "Vermont seeks to achieve equality and equity and to create a culture in which racial, ethnic and other cultural disparities are openly acknowledged and addressed and where no one person is more likely to experience society's benefits or burdens than any other person." HireAbility has embraced this declaration and is working towards putting these words into practice. Working with a contractor and our partners we developed the following DEIA vision statement for the program: HireAbility will become an organization where; All staff and participants have a sense of belonging & feel welcomed here at HireAbility. Our diverse staff reflect the communities that we serve. Our strong connections with multicultural communities and community partners ensures engagement, successful outcomes, and career pathway opportunities for participants from diverse backgrounds.

To make this vision a reality, HireAbility worked with a consultant to conduct a needs assessment and identify opportunities for growth. Based on the results, we have identified four areas of focus, and have formed four charter groups made up of diverse cross-sections of staff to do this work in PY 24 and PY 25. The goals for each charter group are as follows:

- Develop a workforce that reflects the diverse populations we serve.
- Effectively reach all populations that are eligible for our services.
- Ensure staff have access to the tools and knowledge and feel able to serve all participants in a culturally responsive way
- Strengthen our existing communication loops to ensure staff are informed and can contribute.

The Charter groups will be charged with developing strategies to move the agency forward in these areas. They will also identify metrics for success that are meaningful and measurable.

2. PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR, REFLECTING ACTUAL AND NEGOTIATED LEVELS OF PERFORMANCE. EXPLAIN ANY DISCREPANCIES IN THE ACTUAL AND NEGOTIATED LEVELS; AND

THE VR PROGRAM’S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

HireAbility, has consistently performed above the national average across measures. We have also seen performance improvement each year. We believe this is because of the strategic alignment of our services as outlined in the Goals and Priorities of our post WIOA State Plans.

MEASURE	NATIONAL AVERAGE SFY 20	VERMONT RESULTS SFY 20	NATIONAL AVERAGE SFY 21	VERMONT RESULTS SFY 21	NATIONAL AVERAGE SFY 22	VERMONT RESULTS SFY 22	NATIONAL AVERAGE SFY 23	VERMONT RESULTS SFY 23
MEASURABLE SKILLS GAINS	31.4%	49.3%	43.3%	49.0%	43.0%	57.3%	48.7%	56.7%
EMPLOYMENT RATE 2 QUARTERS POST EXIT	51.3%	51.1%	48.6%	53.3%	52.5%	53.3%	56.2%	56.0%
EMPLOYMENT RATE 4 QUARTERS POST EXIT	43.6%	49.7%	44.0%	48.3%	48.0%	52.0%	52.8%	55.4%



MEASURE	NATIONAL AVERAGE SFY 20	VERMONT RESULTS SFY 20	NATIONAL AVERAGE SFY 21	VERMONT RESULTS SFY 21	NATIONAL AVERAGE SFY 22	VERMONT RESULTS SFY 22	NATIONAL AVERAGE SFY 23	VERMONT RESULTS SFY 23
MEDIAN EARNINGS 2 QUARTERS POST EXIT	\$4,005	\$3,901	\$4,280	\$4,630	\$4,776	\$5,213	\$5,130	\$6,153
CREDENTIAL ATTAINMENT	NA	NA	23.2%	42.5%	30.8%	42.5%	37.6%	53.2%

3. THE USE OF FUNDS RESERVED FOR INNOVATION AND EXPANSION ACTIVITIES (SECTIONS 101(A)(18) AND 101(A)(23) OF THE REHABILITATION ACT) (E.G., SRC, SILC).

I&E funds were used to support the "Our Time is Now" initiative. HireAbility, DBVI, the SRC, the Developmental Disabilities Council, the Vermont Center for Independent Living, and the Vermont Public Assets Institute partnered to support a public information campaign that promotes the employment of people with disabilities and dispels myths and stereotypes. The goal of the campaign is to inform state policy makers, employers, and the general public about the workforce potential of people with disabilities. The group produced a report in PY 2020 that was very well received. It demonstrated that Vermont has an acute workforce shortage and people with disabilities are a large and ready pool of potential workers. In the spring of 2022, I&E funds were used to launch a marketing effort to promote the employment of people with disabilities under the banner of "Our Time is Now. The marketing effort was very well received in the community.

In PY 22 HireAbility started planning a follow up to "Our Time is Now" with a focus on individuals with chronic health conditions. I&E funds are being used to contract David Stapleton, a highly respected disability researcher to develop the follow up report.

E. SUPPORTED EMPLOYMENT SERVICES, DISTRIBUTION OF TITLE VI FUNDS, AND ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.

1. ACCEPTANCE OF TITLE VI FUNDS:

(A) VR agency requests to receive title VI funds.

2. IF THE VR AGENCY HAS ELECTED TO RECEIVE TITLE VI FUNDS, SECTION 606(B)(3) OF THE REHABILITATION ACT REQUIRES VR AGENCIES TO INCLUDE SPECIFIC GOALS AND PRIORITIES WITH RESPECT TO THE DISTRIBUTION OF TITLE VI FUNDS RECEIVED UNDER

SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED  
EMPLOYMENT SERVICES. DESCRIBE THE USE OF TITLE VI FUNDS AND HOW THEY WILL BE  
USED IN MEETING THE GOALS AND PRIORITIES OF THE SUPPORTED EMPLOYMENT  
PROGRAM.

HireAbility has committed the VI-B youth award through contracts for the JOBS supported employment program that serves exclusively youth ages 16-24. This ensures only eligible youth are served using this funds. The division provides a 10% state match for the youth VI-B award. The JOBS contracts are fee for benchmark contracts. VI-B funds can only be drawn down for benchmarks for supporting youth post placement. HireAbility, also uses the VI-B Adult award for the JOBS program contracts if funds are available.

The HireAbility VI-B Adult award is used to fund adults with developmental disabilities who are employed on high school exit but do not have supported employment services through the State Developmental Services program. HireAbility holds the VI-B in a separate budget in our case management system that can only be accessed if the participant is in a supported employment plan and currently employed. We often use these funds as a bridge until the individual is found eligible for long term supported employment services through a Medicaid Waiver.

Hireability charges a maximum of 2.5% of administrative costs to the VI-B award.

3. SUPPORTED EMPLOYMENT SERVICES MAY BE PROVIDED WITH TITLE 1 OR TITLE VI  
FUNDS FOLLOWING PLACEMENT OF INDIVIDUALS WITH THE MOST SIGNIFICANT  
DISABILITIES IN EMPLOYMENT. IN ACCORDANCE WITH SECTION 101(A)(22) AND SECTION  
606(B)(3) OF THE REHABILITATION ACT, DESCRIBE THE QUALITY, SCOPE, AND EXTENT OF  
SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST  
SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES;  
AND THE TIMING OF TRANSITION TO EXTENDED SERVICES.

### **Youth with Severe Disabilities**

HireAbility 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. HireAbility counselors will authorize the use of funds for extended services through the JOBS program until the youth reaches age 25, and for up to the maximum of four years. The HireAbility contractual agreements for JOBS include Title I and Title VI-B funds and set clear parameters for the use of each funding source. Title I funds are only used for initial upfront assessment, and job development services. Title VI-B funds are only used for post placement supports for employed participants. A description of the JOBS program is as follows:

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 the primary 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, HireAbility, and contract agencies, the JOBS program is operational in twelve sites across the state. The JOBS program is funded through a combination of Medicaid Global Commitment funds and HireAbility 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 misuse, transportation and probation and parole). Within this model, HireAbility Title I funds are used to provide the employment focus and upfront employment assessment, education or training, and placement services. Title VI B funds are used for post placement supported employment services and extended 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.

HireAbility counselors will also be able to use VI-B funds to support extended services for youth not served by the JOBS programs. These services will be funded on a case-by-case basis for youth with developmental disabilities who have exited school but have not yet met eligibility or system of care priorities for the developmental services program.

### **Adults with Developmental Disabilities**

HireAbility works closely with the Developmental Disabilities Services Division (DDSD) to provide supported employment services. This is a 35 year-plus partnership. Up until FFY 17, HireAbility specifically allocated funds to provide assessment, training, and placement services until case closure. Due to sudden and severe changes in funding, Development Services agreed to pick up HireAbility's contribution in order to continue these long-standing services. These funds are an integral part of the overall employment budget for individuals with developmental disabilities. The funding allows programs to create a seamless structure of upfront and ongoing support with dedicated positions. HireAbility continues to jointly monitor outcomes and provide technical assistance alongside DDSD. HireAbility also continues to open DS supported employment cases to provide individual case services which include work incentives counseling and assistive technology services. Post-Secondary options are available to people with developmental disabilities through College Steps, Succeed, Think College and Project Search.

HireAbility 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 (SFY 22) showed a 42% employment rate for working age adults in the DDSD system, which was a drop in only 5% following a national pandemic.

HireAbility and DDSD have not had sheltered employment workshops for individuals with developmental disabilities since 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 population.<sup>1</sup> In the past three years, the numbers of individuals with developmental disabilities employed in competitive jobs have continued to increase.

### **Adults with Significant Mental Illness**

HireAbility 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, HireAbility 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 16, HireAbility 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, HireAbility decided to reallocate the \$700,000 in Title 110 funds committed to adult mental health to the JOBS program. This decision was made to ensure HireAbility came into compliance with the Pre-Employment Transition Services (Pre-ETS) requirement. In order to meet the 15% Pre-ETS expenditure target, HireAbility had to reassign funds from adult services to services for students and youth. This was a very difficult decision for HireAbility and we are greatly saddened by the impact on supported employment services for adults with mental illness.

While HireAbility no longer has a formal contractual program with the CRT programs to deliver supported employment services, HireAbility continues to partner with CRT programs at the local level. Many CRT programs have sustained their supported employment services despite the loss of HireAbility funding. Local HireAbility offices continue to provide services for CRT participants that supplement their Medicaid funded services such as work Incentives counseling, assistive technology, Employee Assistance Program services, and career counseling and guidance. HireAbility shares in Ticket to Work reimbursement with CRT programs for those mutually shared participants.

HireAbility 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. HireAbility and DMH bring together CRT staff and HireAbility staff on a quarterly basis for training and collaboration efforts statewide. Each HireAbility office has a designated HireAbility vocational counselor liaison assigned to carry the CRT caseload and collaborate with their respective Designated Agency.

4. SECTIONS 101(A)(22) AND 606(B)(4) OF THE REHABILITATION ACT REQUIRE THE VR AGENCY TO DESCRIBE EFFORTS TO IDENTIFY AND ARRANGE, INCLUDING ENTERING INTO COOPERATIVE AGREEMENTS, WITH OTHER STATE AGENCIES AND OTHER APPROPRIATE ENTITIES IN ORDER TO PROVIDE SUPPORTED EMPLOYMENT SERVICES. THE DESCRIPTION MUST INCLUDE EXTENDED SERVICES, AS APPLICABLE, TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THE PROVISION OF EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES IN ACCORDANCE WITH 34 C.F.R. § 363.4(A) AND 34 C.F.R. § 361.5(C)(19)(V).

HireAbility has a partnership with the Department of Mental Health (DMH) to provide extended services for youth and adults with psychiatric disabilities. In most cases the JOBS program uses Medicaid Global Commitment funds to provide extended supports post 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. If these funding sources are not available HireAbility will use Title I or Title VI-B for extended services for youth.

Also , HireAbility 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.

As noted, HireAbility can also use Title I and Title VI-B to provide funds for youth with the most significant disabilities for extended services, until the youth reaches age 25, and for a period not to exceed four years.

#### F. ANNUAL ESTIMATES

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 C.F.R. § 361.29(b), annual estimates must include the following projections:

##### 1. ESTIMATES FOR NEXT FEDERAL FISCAL YEAR—

##### A. VR PROGRAM; AND

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If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
Priority 1	4,346	4,346	\$13,011,955	0
Priority 2	1,152	1,152	\$2,882,650	0
Priority 3	144	144	\$360,331	0
Priority 4	4	4	\$10,008	0

##### B. SUPPORTED EMPLOYMENT PROGRAM.

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Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
Priority 1	400	400	\$290,000	0

G. ORDER OF SELECTION

1. PURSUANT TO SECTION 101(A)(5) OF THE REHABILITATION ACT, THIS DESCRIPTION MUST BE AMENDED WHEN THE VR AGENCY DETERMINES, BASED ON THE ANNUAL ESTIMATES DESCRIBED IN DESCRIPTION (F), THAT VR SERVICES CANNOT BE PROVIDED TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR AND ARE DETERMINED ELIGIBLE FOR SERVICES.

\* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

The VR agency is not implementing an order of selection and all eligible individuals will be served.

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—

A. THE JUSTIFICATION FOR THE ORDER

HireAbility is proposing to exit an order of selection effective July 1, 2024.

B. THE ORDER (PRIORITY CATEGORIES) TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES ENSURING THAT INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

HireAbility will continue to categorize applications based on the criteria below which were approved by the SRC in 2017. We will keep this data to inform any future decisions regarding the need for an order of selection.

Category 1: Individuals who have been determined by HireAbility 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 HireAbility 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 HireAbility 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 HireAbility 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.

C. THE VR AGENCY'S GOALS FOR SERVING INDIVIDUALS IN EACH PRIORITY CATEGORY, INCLUDING HOW THE AGENCY WILL ASSIST ELIGIBLE INDIVIDUALS ASSIGNED TO CLOSED PRIORITY CATEGORIES WITH INFORMATION AND REFERRAL, THE METHOD IN WHICH THE VR AGENCY WILL MANAGE WAITING LISTS, AND THE PROJECTED TIMELINES FOR OPENING PRIORITY CATEGORIES. NOTE: PRIORITY CATEGORIES ARE CONSIDERED OPEN WHEN ALL INDIVIDUALS IN THE PRIORITY CATEGORY MAY BE SERVED.

HireAbility will not be in an Order of Selection starting July 1, 2024.

3. HAS THE VR AGENCY ELECTED TO SERVE ELIGIBLE INDIVIDUALS OUTSIDE OF THE ORDER OF SELECTION WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT?

No

#### H. WAIVER OF STATEWIDENESS.

The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with Section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 C.F.R. § 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 C.F.R. § 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."

No applicable

#### I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT.

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the State VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

1. ANALYSIS OF CURRENT PERSONNEL AND PROJECTED PERSONNEL NEEDS INCLUDING—

A. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

B. THE NUMBER AND TYPE OF PERSONNEL THAT ARE EMPLOYED BY THE VR AGENCY IN THE PROVISION OF VOCATIONAL REHABILITATION SERVICES, INCLUDING RATIOS OF QUALIFIED VOCATIONAL REHABILITATION COUNSELORS TO CLIENTS;

C. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES IN 5 YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.

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Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Director	1	1	1
Central Office Managers	8	8	8
Regional Managers	6	6	6
Transition Counselors serving students and youth	25	25	25
Vocational Counselors serving adults	35	35	35
Rehabilitation Counselors for the Deaf	2	2	2
Certified Work Incentive Counselors	6	6	7
Administrative Support and Program Techs	17	17	18
Employee Assistance Program Staff and Managers	14.75	14.75	17
Central Office Project	4	4	4



Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Coordinators and Program Managers			
Data Administrators	2	2	2
Assistive Technology Staff	5.2	5.2	6
Business Account Managers	4	4	6
Contracts Administrator and Operations staff	2	2	2

D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

91

E. PROJECTED NUMBER OF INDIVIDUALS TO BE SERVED IN 5 YEARS:

6,000

2. DATA AND INFORMATION ON PERSONNEL PREPARATION AND DEVELOPMENT, RECRUITMENT AND RETENTION, AND STAFF DEVELOPMENT, INCLUDING THE FOLLOWING:

A. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM; THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.

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Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
University of Southern Maine	Rehab Counseling	6	3
Assumption University	Rehab Counseling	9	0
Solve Regina	Rehab Counseling	5	1

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
University of Mass	Rehab Counseling	2	0
University of Wisconsin Stout	Rehab Counseling	1	0
University of West Virginia	Rehab Counseling	1	0
Emporia University	Rehab Counseling	1	0

**B. THE VR AGENCY’S PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL, WHICH ADDRESSES THE CURRENT AND PROJECTED NEEDS FOR QUALIFIED PERSONNEL; AND THE COORDINATION AND FACILITATION OF EFFORTS BETWEEN THE VR AGENCY AND INSTITUTIONS OF HIGHER EDUCATION AND PROFESSIONAL ASSOCIATIONS TO RECRUIT, PREPARE, AND RETAIN PERSONNEL WHO ARE QUALIFIED, INCLUDING PERSONNEL FROM MINORITY BACKGROUNDS AND PERSONNEL WHO ARE INDIVIDUALS WITH DISABILITIES.**

In January 2020 HireAbility established an internship program and entered into Affiliation Agreements with the following schools: George Washington University, University of Vermont, Springfield College, University at Buffalo, the State University of New York, Vermont State University, University of Massachusetts Boston, and the University of Alabama. We have had nine (9) interns who have completed internships and have hired two (2) thus far. We currently have three (3) interns.

HireAbility has established a list of schools to actively recruit qualified personnel. Assumption University, George Washington University, Salve Regina University, University of Southern Maine, University of Wisconsin–Stout, University of Massachusetts Boston, and Springfield College. Our Field Services Managers send out job openings to identified contacts at each school’s Master’s in Rehabilitation Counseling program so they can share this recruitment information with current students and alumni. These graduates meet the highest standard of education and obtain certification at the highest level for this field. HireAbility 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 various New England colleges, by posting positions on internal employment pages of their websites. All these graduates are candidates for counseling vacancies if they are willing to complete the four core rehabilitation courses.

State personnel policies require HireAbility to consider qualified applicants on the Reduction in Force list before other applicants. HireAbility advertises openings through the State recruitment system SuccessFactors Recruiting, which includes added exposure to the State of Vermont Careers page, Indeed.com, and announcements on the Vermont Department of Human Resources Twitter and Facebook pages. HireAbility also advertises through local newspapers (coordinated ad program), on-line on USA Today Job Network, and by listing openings through college placement services. Assumption University, Auburn University, George Washington University, Salve Regina University, University of Southern Maine, University of Wisconsin–

Stout, University of Massachusetts Boston and Springfield College 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 using the Idealist website, posting in the Boston Globe, and connecting with deaf and hard of hearing student organizations at 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 HireAbility participants to apply for posted positions and obtain the education necessary to be competitive. HireAbility also promotes 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.

C. DESCRIPTION OF STAFF DEVELOPMENT POLICIES, PROCEDURES, AND ACTIVITIES THAT ENSURE ALL PERSONNEL EMPLOYED BY THE VR AGENCY RECEIVE APPROPRIATE AND ADEQUATE TRAINING AND CONTINUING EDUCATION FOR PROFESSIONALS AND PARAPROFESSIONALS:

I. PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

II. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO VR AGENCY PROFESSIONALS AND PARAPROFESSIONALS AND FOR PROVIDING TRAINING REGARDING THE AMENDMENTS TO THE REHABILITATION ACT MADE BY THE WORKFORCE INNOVATION AND OPPORTUNITY ACT.

Beginning in January 2024 HireAbility will contract with a a cloud-based training platform called YesLMS which provides a library of high-quality courses written by experienced vocational rehabilitation professionals. These trainings can be customized and edited specifically for HireAbility Vermont. The library of available trainings is designed specifically for VR practitioners and is delivered in an accessible and engaging format. The library currently consists of 124 courses that can be taken at any time. The topics range from ethics and leadership to disability specific education and Motivational Interviewing. Courses can be bundled to create different learning paths for staff based on their roles, interests or familiarity with a subject.

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. HireAbility staff receive training related to assessment through webinars and in-person training offered by the Staff Development and Training Manager, Program Managers, external partners, contracted trainers, and the Career Counseling and Assessment Specialist team. The Career Counseling and

Assessment Specialist team is comprised of staff who are trained and knowledgeable about the administration, interpretation, and application of various vocational assessments. This team also reviews assessment tools to identify those that are no longer relevant or those that need to be included in HireAbility's Career 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 HireAbility staff and contracted partners receive introductory and advanced training in Motivational Interviewing to enhance this skill set.

Motivational Interviewing (MI) training was introduced to HireAbility in 2014 with comprehensive training for all staff. A statewide cadre of internal MI Coaches provide monthly coaching circles for district staff to practice MI skills. Statewide introductory MI trainings are offered three times a year for all new HireAbility staff. New staff are also supported by their district's MI Coach. All HireAbility staff are expected to attend an annual MI training that focuses on a new area, role, or topic. 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 participants 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 individuals with disabilities. There are well-established results available regarding its effectiveness with those who experience substance misuse issues. A high number of HireAbility participants struggle with substance and alcohol addiction, which reinforces the relevance of having staff trained in MI techniques and practices. Sustainability of this initiative occurs through ongoing development of the internal HireAbility MI Coaches and contracted external trainers to ensure training is available to all staff and meets the training requirements of those providing direct service. The internal HireAbility MI Coaches have already received additional MI focused facilitation training and one-on-one coaching with a contracted external MI trainer. This allows the MI Coaches to evaluate staff levels of proficiency in using MI skills and strategies in the vocational counseling process with fidelity to the model/approach, and design training and support that responds to the areas needing development. In 2023 we focused on MI Training that was role specific. Our internal MI Coaches each took on a specific role within HireAbility to lead coaching circles that were specific to our Administrative Team, Business Account Managers, Program and Senior Managers, etc. We have also contracted with an external MI trainer to deliver trainings such as Employer as the Customer, MI for Supervision and Leadership, and MI and Ethics.

Staff development related to job placement is provided through several venues. HireAbility is working with ICI Boston and Cornell University to develop on-line trainings for newly hired contracted staff who provide placement services. Regularly scheduled meetings hosted by the HireAbility funded Business Account Managers ensure development of knowledge related to the labor market and effective job placement. One such meeting that specifically promotes cooperative job placement and employer relationships, is comprised of district HireAbility contracted employment staff and staff from local Agency of Human Services funded employment programs.

Training related to rehabilitation technology is provided initially through the HireAbility services training program for new hires. Additional training and staff development are 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 HireAbility staff group, the Certified Work Incentive Counselors, receive specialized training to ensure the provision of quality services in working with participants who receive monetary or medical benefits. Ongoing training and support are provided by a HireAbility Project Manager and Senior Work Incentives Counselor. The local Social Security Administration (SSA) Area Work Incentives Coordinator provides quarterly trainings to the Work Incentives Counselors on a variety of SSA Work Incentives issues. SSA also provides training and technical assistance for Work Incentives Counselors through contracts with Cornell and Virginia Commonwealth University. HireAbility is a Work Incentives Planning and Assistance (WIPA) provider offering work incentives counseling to Vermonters. The six Work Incentives Counselors and Program Manager are certified by SSA as Certified Work Incentive Counselors (CWIC). To achieve certification, these staff must attend online or in person training and complete a comprehensive “take home” assignment that is evaluated by Virginia Commonwealth University. To maintain CWIC credentials, WICs must complete annual continuing education requirements through VCU.

The State of Vermont Assistive Technology Program (ATP) is housed within HireAbility. The ATP has 5.25 state staff classified as Assistive Technology Specialists and contracts with the University of Vermont for two additional Assistive Technology Specialists. HireAbility counselors routinely refer participants to the ATP for consultations. The ATP specialists have twice monthly professional development days to keep abreast of the latest advancements in AT services. AT vendors are regularly invited to ATP staff meetings to present the latest technology. Staff also attend national and regional AT conferences and training events.

**3. DESCRIPTION OF VR AGENCY POLICIES AND PROCEDURES FOR THE ESTABLISHMENT AND MAINTENANCE OF PERSONNEL STANDARDS CONSISTENT WITH SECTION 101(A)(7)(B) TO ENSURE THAT VR AGENCY PROFESSIONAL AND PARAPROFESSIONAL PERSONNEL ARE ADEQUATELY TRAINED AND PREPARED, INCLUDING—**

**A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND**

**B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.**

The 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, HireAbility hires

counselors with a master's degree in an unrelated program or a bachelors' degree and supports their graduate training. Though not required by HireAbility or by RSA, some counselors also become Certified Rehabilitation Counselors (CRC) through the Commission on Rehabilitation Counselor Certification. HireAbility supports staff who wish to become CRCs and those who continue to maintain their CRC credentials. Ten (10) staff are currently CRCs with two (2) counselors currently pursuing their CRC credential. HireAbility is an approved Continuing Education Provider for the Commission on Rehabilitation Counseling Certification (CRCC). We actively seek to provide trainings that meet the CRCC guidelines and offer certificates. Training opportunities with CRC certificates are sent out monthly to staff who have their CRCs.

In the future HireAbility may request data from New England college programs about the number of students in relevant programs. We would use this data to plan future recruitment activities. The following is a breakdown of the educational plans for HireAbility staff. These plans fall into a three category system based on the availability of existing financial resources and are consistent with any national, 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.

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.

Category 3: Staff who have graduate degrees in counseling or a related field and are required to take four core rehabilitation courses to comply with the CSPD requirements.

The percentage of our current counselors who meet the CSPD standard Category 1 is 59.1% (42 counselors out of 71). The remaining 40.9% of staff meet Category 2 or Category 1. Timelines for meeting graduate training requirements 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 five (5) years for a full master's degree and three (3) years for core classes. Staff are encouraged to fill out an Education Plan with their supervisor and submit it to the Staff Development and Training Manager. All training information related to core courses and completion of master's degrees is stored on a Microsoft Teams Channel that all staff who are in the process of completing CSPD coursework are members of. The "posts" section of the channel also allows for cross office discussion and support for staff. A spreadsheet is maintained by HireAbility's Staff Development and Training Manager to track staff throughout the process.

Upon hire, HireAbility staff become members of a New Hire Cohort in Microsoft Teams. They manage a new hire checklist of between 25 and 32 items, depending on their role within HireAbility. Content is delivered in a variety of ways including virtual, recorded, self-paced and in-person by HireAbility's Program Managers, AWARE Trainers, MI Coaches, State of Vermont, contracted trainers, external partners and the HireAbility's Staff Development and Training Manager. The trainings are designed to be delivered in short sessions over the course of the first six (6) months with HireAbility. This delivery model ensures content is delivered for a variety of

learning styles and in smaller increments to ensure the material is digestible. The trainings cover HireAbility'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 other aspects of vocational rehabilitation.

4. METHOD(S) THE VR AGENCY USES TO ENSURE THAT PERSONNEL ARE ABLE TO COMMUNICATE IN APPROPRIATE MODES OF COMMUNICATION WITH OR IN THE NATIVE LANGUAGE OF APPLICANTS OR ELIGIBLE INDIVIDUALS WHO HAVE LIMITED ENGLISH SPEAKING ABILITY.

The Agency of Human Services has contracts with the Association of Africans Living in VT for in-person translation services, the U.S. Committee for Refugees and Immigrants' Vermont Field Office for in-person, telephonic, and audio-visual interpretation services, as well as three other providers for telephonic interpretation and translation services (Propio., Worldwide Interpreters, Inc., and Language Link).

The Agency of Human Services has a contract with Vancro Integrated Interpreting Services for American Sign Language interpreters. HireAbility utilizes a variety of assistive technology tools to help participants who are deaf or hard of hearing communicate with HireAbility staff, other service providers and employers. This includes video phones, the telephone relay service, and other tools. HireAbility also has two Rehabilitation Counselors for the Deaf who are fluent in ASL and serve an exclusively deaf and hard of hearing caseload. HireAbility consults extensively with DBVI around assistive technology and other tools to support participants who are blind and visually impaired. This includes use of Dragon and other voice activated tools. HireAbility can also access specialized ASL interpreters through the interpreter contract to translate for participants who are deaf.

5. AS APPROPRIATE, DESCRIBE THE PROCEDURES AND ACTIVITIES TO COORDINATE THE DESIGNATED STATE UNIT'S COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT WITH PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT.

The HireAbility 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. HireAbility and AOE have a long history of co-sponsoring trainings and conferences for frontline staff.

The Transition Program Manager regularly reviews and shares training provided by the technical assistance centers, such as George Washington University's Center for Innovative Training in Vocational Rehabilitation (CIT-VR) and the National Technical Assistance Center on Transition (NTACT), to ensure that staff are aware of the most recent and relevant information. The Post-Secondary Transition Coordinator from the VT Agency of Education (AOE) attends an annual HireAbility Transition Counselor meeting to provide information as needed around IDEA and Transition Planning specific to Vermont schools.

HireAbility, in collaboration with the AOE and other core partners who provide services to students, puts on an annual Inter-agency Core Team event with workshops and content specific to best serving youth in VT. This conference supports the work that is happening locally across the state with Transition Core Teams. The goal is to effectively collaborate around services and provide both trainings and information about resources available to support youth in their post-secondary and career planning process.

## J. COORDINATION WITH EDUCATION OFFICIALS.

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

### 1. DESCRIBE PLANS, POLICIES, AND PROCEDURES FOR COORDINATION BETWEEN THE DESIGNATED STATE AGENCY AND EDUCATION OFFICIALS RESPONSIBLE FOR THE PUBLIC EDUCATION OF STUDENTS WITH DISABILITIES, THAT ARE DESIGNED TO FACILITATE THE TRANSITION OF THE STUDENTS WITH DISABILITIES FROM THE RECEIPT OF EDUCATIONAL SERVICES IN SCHOOL TO THE RECEIPT OF VOCATIONAL REHABILITATION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES.

There is a Transition Program Manager in HireAbility's central office, who supports all transition activities statewide. The Transition Program Manager and HireAbility Director routinely meet with Vermont Agency of Education staff to coordinate services, and include Department of Labor, Developmental Disabilities Services Division, Department of Health, VT Assistive Technology Program, and Division for the Blind and Visually Impaired staff in these meetings.

HireAbility has a long-standing commitment of serving students in transition. With the passage of the Workforce Innovation and Opportunity Act (WIOA) in July 2014, HireAbility built an infrastructure for transition aged youth, to implement Pre-Employment Transition Services (Pre-ETS). In 2020 HireAbility expanded services provided by Transition Counselors to include serving youth aged 14 to 25. HireAbility currently has 25 Transition Counselors (24 FTE) that serve youth aged 14 to 25, including all in-school students, and provide Pre-Employment Transition Services activities as required in WIOA.

HireAbility Transition Counselors recruit students age 14 to 22 who are eligible for Pre-ETS services, from local school districts and other independent or private secondary educational programs. The Transition Counselors operate out of all twelve HireAbility district offices and cover all Vermont high school districts. Counselors serve as a community resource to the schools, facilitating inter-agency partnerships through routine Core Transition Team meetings in each of the twelve HireAbility districts. The goal of these teams is to share resources, partner to support youth, and act as catalysts for change to improve the transition process for youth with disabilities. The Transition Counselor is required to develop an IPE (Individualized Plan for Employment) for students found eligible for HireAbility services, prior to exit from high school. HireAbility tracks this metric as part of our quality assurance dashboard. The Transition Counselors continue to work with youth after high school exit as they have since 2020, to ensure that students graduating and moving on to either post-secondary education or careers have consistent, seamless support during this important transition.

In the summer of 2021, HireAbility launched the Summer Career Exploration Program (SCEP) that provided paid work experiences for students with disabilities. About 150 students participated in 2021 and the program was run again in 2022 and 2023. Over 350 students have participated in the SCEP program to date and over 100 have gained competitive jobs as a direct result. Also, we have determined that students who participate in the SCEP program are far more likely to continue to engage with HireAbility after they exit high school.

To provide Pre-ETS, HireAbility created the Youth Employment Specialist model, and contracted with the Vermont Association of Business, Industry, and Rehabilitation (VABIR). VABIR provides Youth Employment Specialists (YES) to work one on one with Transition Counselors to



support 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 for training and to share best practices.

The Jump on Board for Success (JOBS) program provides supported employment services for out of school youth aged 16-25 with severe emotional and behavioral disabilities. Two designated HireAbility counselors support Transition Counselors and JOBS staff around the state to collaborate and identify youth who are at risk of dropping out of school or are within six months of graduation and may be eligible for JOBS services. The designated JOBS counselors and JOBS staff coordinate with local high schools for services to help youth successfully transition from high school. There are ten JOBS programs around the state and a total of 13 JOBS sites operated by the Designated Agencies.

The Developmental Services (DS) 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 Transition Counselors and DS staff coordinate with the local high schools for services to youth exiting high school. There are fifteen DS programs around the state run by Designated Agencies or Specialized Service Agencies.

The Transition Counselors collaborate with the Certified Work Incentive Counselors (CWIC) to provide services to youth and their families in high schools. The VR Benefits CWIC program provides information and resources about state and federal benefits as well as information on Social Security work incentives. It is crucial that students and their families have access to accurate and appropriate information when making informed decisions around employment and education choices.

**2. DESCRIBE THE CURRENT STATUS AND SCOPE OF THE FORMAL INTERAGENCY AGREEMENT BETWEEN THE VR AGENCY AND THE STATE EDUCATIONAL AGENCY. CONSISTENT WITH THE REQUIREMENTS OF THE FORMAL INTERAGENCY AGREEMENT PURSUANT TO 34 C.F.R. § 361.22(B), PROVIDE, AT A MINIMUM, THE FOLLOWING INFORMATION ABOUT THE AGREEMENT:**

**A. CONSULTATION AND TECHNICAL ASSISTANCE, WHICH MAY BE PROVIDED USING ALTERNATIVE MEANS FOR MEETING PARTICIPATION (SUCH AS VIDEO CONFERENCES AND CONFERENCE CALLS), TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES AND OTHER VOCATIONAL REHABILITATION SERVICES;**

**B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY PERSONNEL FOR STUDENTS WITH DISABILITIES THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS (IEPS) UNDER SECTION 614(D) OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT;**

**C. THE ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND**

QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES AND PRE-EMPLOYMENT  
TRANSITION SERVICES;

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES. OUTREACH TO THESE STUDENTS SHOULD OCCUR AS EARLY AS POSSIBLE DURING THE TRANSITION PLANNING PROCESS AND MUST INCLUDE, AT A MINIMUM, A DESCRIPTION OF THE PURPOSE OF THE VOCATIONAL REHABILITATION PROGRAM, ELIGIBILITY REQUIREMENTS, APPLICATION PROCEDURES, AND SCOPE OF SERVICES THAT MAY BE PROVIDED TO ELIGIBLE INDIVIDUALS;

E. COORDINATION NECESSARY TO SATISFY DOCUMENTATION REQUIREMENTS SET FORTH IN 34 C.F.R. PART 397 REGARDING STUDENTS AND YOUTH WITH DISABILITIES WHO ARE SEEKING SUBMINIMUM WAGE EMPLOYMENT; AND

F. ASSURANCE THAT, IN ACCORDANCE WITH 34 C.F.R. § 397.31, NEITHER THE SEA NOR THE LOCAL EDUCATIONAL AGENCY WILL ENTER INTO A CONTRACT OR OTHER ARRANGEMENT WITH AN ENTITY, AS DEFINED IN 34 C.F.R. § 397.5(D), FOR THE PURPOSE OF OPERATING A PROGRAM UNDER WHICH YOUTH WITH A DISABILITY IS ENGAGED IN WORK COMPENSATED AT A SUBMINIMUM WAGE.

A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

The HireAbility Director, Transition Program Manager, and DS Program Manager meet quarterly with the Special Education Director of the Vermont Agency of Education and AOE Transition staff, to organize the annual Transition Conference, discuss ways to collaboratively improve Indicators 13 and 14, and stay coordinated on other transition issues. AOE Transition staff provide ongoing technical assistance to the HireAbility Transition Counselors, and the Transition Counselors coordinate information and education with schools in their local service areas. AOE and HireAbility have completed a new Interagency Agreement as required under WIOA. The Agreement specifically allows for consultation and technical assistance via alternative means such as video conference and other remote methods.

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 HireAbility Transition Counselors use resources and trainings within statewide meetings, as well as those offered through George Washington University's Center for Innovative Training in Vocational Rehabilitation grant, NTACTION, and Y-TAC, to support strong school relationships and best understand their roles within the implementation of the individualized education program. They also use the internal Pre-Employment Transition Services Manual for guidance. There are facilitated "meet and greets" in the fall with school staff to identify specific needs, issues, and obstacles in their schools, and to create a plan to address these needs. Local and State Agency Core Transition Team meetings occur around the state to support Pre-ETS work.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

HireAbility/DBVI Responsibilities

HireAbility and DBVI are the Designated State Units for the public vocational rehabilitation program in the State of Vermont. In this role HireAbility and DBVI will:

- Provide Local Education Agencies (LEA) with access to Pre-Employment Transition required services for potentially eligible students:
- Work-based learning experiences which may include in-school or after school opportunities, or experiences outside the traditional school setting
- Job exploration counseling
- Workplace readiness training to develop social skills and independent living
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education
- Self-advocacy training
- Provide vocational rehabilitation and school-to-work transition services for youth

determined eligible for HireAbility or DBVI services with an approved Individual Plan for Employment (IPE), including but not limited to:

- Vocational assessment
- Counseling and consultation around the development of the Individual Plan for Employment (IPE) that is coordinated with the IEP or 504 plan
- Vocational counseling and guidance
- Job placement services
- Other paid services that are part of an approved IPE

Financial Responsibility

HireAbility/DBVI Responsibility

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

LEA Responsibility

LEAs are responsible for paying for any transition services that are considered 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:

- The Purpose of the Service - Is the purpose of the service primarily related to an educational outcome or an employment outcome?
- 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 HireAbility or DBVI.

### Eligibility

Is the student with a disability eligible for transition services under IDEA?

Because the definition of “student with a disability” for the HireAbility and DBVI programs includes an individual with a disability for the purposes of Section 504 of the Rehabilitation Act, it is a broader definition that it is under IDEA. HireAbility 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 special education or related services necessary for providing a free appropriate public education to students with disabilities.

Since Vermont does not permit sub-minimum wage employment there was no need to address 511 in this agreement.

### D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

The HireAbility Transition Counselors and DBVI counselors will maintain contact with school personnel in each LEA to ensure early identification of students who are in special education or are either receiving or eligible for 504 services. This identification may occur as early as freshman year and includes HireAbility/DBVI involvement in IEP/Transition Team meetings and in 504 plan meetings, as requested by the school staff, student or family. DBVI counselors will also identify potentially eligible students through the Vermont Association for the Blind and Visually Impaired educators located in LEAs statewide. As part of outreach efforts HireAbility and DBVI will provide the following at minimum:

- A description of the purpose of the HireAbility or DBVI program
- The eligibility requirements for the HireAbility or DBVI program
- The application procedures

- Participation in statewide and local youth-focused conferences
- The scope of services that may be provided

HireAbility and DBVI will provide brochures and other materials to schools to be shared with students with disabilities and their families. Additionally, local core transition teams and other partners will provide the HireAbility Transition Counselors and DBVI counselors with a forum to discuss the projected number of students who will need transition services from HireAbility and/or DBVI and how best to collaborate and support these students.

Outreach activities by HireAbility and DBVI, may include:

- Sharing the HireAbility transition outreach materials or DBVI pamphlet with Special Education staff, students, and their families.
- Conducting HireAbility and DBVI orientation sessions in the school for Special Education staff, students and their families, to explain VR eligibility and services.
- Participation in local Core Transition Teams, in which members of local agencies working with youth collaborate around best practices and share resources.
- Developing ways to identify students at risk for dropping out of school

## K. COORDINATION WITH EMPLOYERS

In accordance with the requirements in Section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

### 1. VR SERVICES; AND DUAL CUSTOMER DESIGN

HireAbility Vermont's dual-customer approach considers both individuals with disabilities and the business community as key customers of the program. To that end, HireAbility 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. 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 HireAbility.

In addition to the Business Account Managers, HireAbility has contracted 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

HireAbility 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 participant 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 business 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.

### Caseload Driven Outreach:

Caseload driven outreach is defined as labor market outreach directly related to participants on counselors' current caseloads. Business Account Managers are tasked with directing two-thirds of their activities to caseload needs.

## IMPLICATIONS FOR HIREABILITY PARTICIPANTS

By developing relationships over time, HireAbility has positioned itself 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 HireAbility candidates.
- Gathering information on businesses willing to offer worksite experiences, company tours, and informational interviews, 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 specific 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 HireAbility Transition Counselors and Youth Employment Specialists, who work exclusively with students to provide Pre-Employment Transition Services. In particular, the Business Account Managers provide:

- Employer contacts who are willing to provide work-based learning experiences for students.
- Employer contacts 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 specific 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 HireAbility programs. This coordinated approach maximizes the impact of HireAbility employer outreach and reduces duplicate contacts with employers.

### L. INTERAGENCY COOPERATION WITH OTHER AGENCIES

In accordance with the requirements in Section 101(a)(11)(C) and (K), describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

#### 1. STATE PROGRAMS (DESIGNATE LEAD AGENCY(IES) AND IMPLEMENTING ENTITY(IES)) CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

The Vermont Assistive Technology program (VATP), funded by the federal Assistive Technology Act administered by the Administration for Community Living (ACL) in Health and Human Services (HHS), is housed within HireAbility Vermont as part of the Department of Disabilities Aging and Independent Living (DAIL). The VATP staff receive operational and business office support through DAIL and HireAbility. The program maintains a contract, in conjunction with HireAbility, for Assistive Technology (AT) Specialist services currently provided by the University of Vermont. These include AT Core services such as tech demonstrations, loans, information and assistance, and trainings, as well as consultations for HireAbility participants that could benefit from Assistive Technology or devices. The VATP also has three additional AT Specialists on staff. One is funded through the Vermont Career Advancement Project grant, a

Work Based Learning Demonstration funded through the US Department of Education. This specialist provides AT services to individuals participating in VCAP. The second AT Specialist provides AT services for HireAbility participants in the eastern corridor of the state. The final specialist is funded by a supplemental grant of the Money Follows the Person program and is responsible for interfacing with aging services providers throughout the state and with Money Follows the Person recipients. The goal is to enhance their understanding of AT and how it can be used to transition individuals from high care facilities to more independent living environments. The VATP constantly searches for new opportunities to collaborate. For example, we have begun a partnership in the last year with the newly established UVM Occupational Therapy Doctoral program to provide learning opportunities for their students. This includes technical assistance in establishing a smart home demo center for both students and the general public. Finally, the VATP partners with Opportunities Credit Union to provide low interest, variable term loans for purchasing AT equipment such as modified vehicles and hearing aids, that would be beyond the reach of some individuals.

## 2. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

HireAbility currently does not have a cooperative agreement with programs carried out by the Under Secretary for Rural Development of the Department of Agriculture.

## 3. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH;

HireAbility 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. The JOBS program is a supported employment program serving youth, ages 14 to 24, with emotional behavioral disabilities. The program is funded by Medicaid Global Commitment with the partnering departments providing the required state match. The JOBS programs are housed within the Designated Community Mental Health Agencies within the twelve Agency of Human Services districts.

## 4. STATE USE CONTRACTING PROGRAMS;

HireAbility does not have a cooperative agreement with State Use contracting programs.

## 5. STATE AGENCY RESPONSIBLE FOR ADMINISTERING THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT (42 U.S.C. 1396 ET SEQ.);

As Divisions within the Department of Disabilities, Aging and Independent Living (DAIL), HireAbility and DBVI have entered an Intergovernmental Agreement with the Department of Vermont Health Access (DVHA). 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 (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/HireAbility/DBVI and DVHA are committed to implementing employment services through the blending and braiding of VR Title I and Title VI-B funding with DDS 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:

#### Funding of Time-Limited Supported Employment Services

Except for youth with the most significant disabilities who may also receive extended services, DAIL/HireAbility/DBVI funding of supported employment is time-limited for a period of not more than 24 months unless a determination is made that a longer period is necessary based upon the individual's needs. Funded services must be based on a determination of the needs of an eligible individual, as specified in an Individualized Plan for Employment.

DAIL/HireAbility/DBVI will fund the following services with Title I funds prior to placement and with either Title I or Title VI B funds following placement.

- Supported employment assessment services
- Supported employment job search and placement services
- Supported employment work supports
- Customized employment
- Work incentives counseling
- Progressive employment
- Case services for additional work supports such as work clothes and transportation

#### Funding for Extended Services

Extended services are the ongoing services that are needed to support and maintain an individual with a most significant disability in supported employment after the individual has made the transition from DAIL/HireAbility/DBVI time-limited services. Extended services can be funded by DAIL/HireAbility/DBVI for youth with the most significant disabilities, until age 25, and for a period not to exceed four years. DAIL/HireAbility/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 funded through Global Commitment, Home and Community Based Medicaid Services (HCBS) for people who meet the

DDS eligibility criteria. DAIL/DDSD HCBS funding is individualized and based on the support needs of the participant. If 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 short-term assessment, job development, job placement services, and extended services.

#### JOBS Program

The JOBS program's supported employment 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.

### 6. STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES;

HireAbility and DBVI are housed within the same department as the Developmental Disabilities Services Division (DDSD). An Intradepartmental Agreement was developed within DAIL to cover the respective responsibilities of the three Divisions. The purpose of this agreement is to describe how HireAbility, 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, HireAbility 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, HireAbility and DBVI are sister Divisions within DAIL and operate under the direction of the DAIL Commissioner. As such, HireAbility, DBVI and DDSD take a "one agency" approach to the funding and implementation of supported employment services for adults and youth with developmental disabilities.

HireAbility, DBVI and DDSD have collaborated for over thirty years to implement supported employment services for adults with developmental disabilities. HireAbility, 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, 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 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

HireAbility, DBVI and DDS are committed to implementing supported employment services through the blending and braiding of VR Title I and Title VI-B funding with DDS 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.

#### HireAbility and DBVI Responsibilities

##### Funding of Time-Limited Supported Employment Services

Except for youth with significant disabilities, who may also receive extended services, DAIL/HireAbility/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/HireAbility/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 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 time-limited services. Extended services can be funded by HireAbility and DBVI for youth with the most significant disabilities, for a period not to exceed four years. HireAbility may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

#### DDS Responsibilities

##### Funding for Supported Employment Services and Extended Services

DDS 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 participant. If 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 short-term assessment, job development, job placement services, and extended services.

#### Availability of Funding

The DDS 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, DDS may reduce or end funding for supported employment services.

### 7. STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES; AND

HireAbility 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/HireAbility/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/HireAbility/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/HireAbility/DBVI/DBVI and DMH have collaborated for over thirty years to implement supported employment services for youth and adults with psychiatric disabilities.

DAIL/HireAbility/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, 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 HireAbility/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/HireAbility/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 the primary 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/HireAbility/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/HireAbility/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/HireAbility/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/HireAbility/DBVI Responsibilities

### Funding for Time Limited Supported Employment Services

Except for youth with significant disabilities, who may also receive extended services, DAIL/HireAbility/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/HireAbility/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 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/HireAbility/DBVI time-limited services. Extended services can be funded by DAIL/HireAbility/DBVI for youth with the most significant disabilities, until age 25, and for a period not to exceed four years. DAIL/HireAbility/DBVI may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

#### DMH Responsibilities

##### 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.

## 8. OTHER FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS OUTSIDE THE WORKFORCE DEVELOPMENT SYSTEM.

HireAbility Vermont 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 Vocational Counselors in each region. Vocational 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 Vocational 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. HireAbility has assisted many Work4Kids participants in securing employment.

HireAbility also serves offenders with disabilities to achieve employment. Employment is a critical component of preventing recidivism and assisting offenders released from prison to successfully reintegrate into their communities. HireAbility has designated Vocational Counselors in each district office to serve as a single point of contact for the Department of Corrections. HireAbility also has one dedicated counselor who is deployed in correctional facilities to help offenders with disabilities engage in services. This counselor conducts initial engagement, determines eligibility, and refers eligible individuals to their local district office.

#### 9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.

HireAbility 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, HireAbility negotiated a new Ticket to Work cooperative agreement with the agencies in anticipation of the new regulations 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.

HireAbility has contractual fee for service agreements with VABIR (primary CRP) to provide job development and job placement services for participants. HireAbility also has a fee for service with VABIR to provide Pre-ETS services for students in coordination with the Transition Counselors. HireAbility contracts with the local community mental health system for supported employment services (JOBS) for youth with severe emotional/behavioral disabilities. JOBS program services are coordinated centrally through two designated HireAbility counselors. While HireAbility no longer contracts with the Community Rehabilitation and Treatment (CRT) program for adults with severe mental illness, they continue to provide additional employment supports including case services, work incentives counseling, and coordination around job development. CRT supported employment services are coordinated by local counselor liaisons.

#### ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner, that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

**The VR agency must select the “Edit” button to review and agree to the VR State plan Assurances.**

The State Plan must include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.
3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:
3.a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.
3.b. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
3.c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.
3.d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).
3.e. as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.
3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
3.h. the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.
3.i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
3.j. the requirements for the comprehensive system of personnel development, as set forth in



The State Plan must include
section 101(a)(7) of the Rehabilitation Act.
3.k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.
3.l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).
3.m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:
4.a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.
4.b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.
4.c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
4.d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
4.e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act
4.g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
4.h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act.
4.i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation

The State Plan must include
programs.
4.j. With respect to students with disabilities, the State,
4.j.i. has developed and will implement,
4.j.i.A. strategies to address the needs identified in the assessments; and
4.j.i.B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113).
4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5. Program Administration for the Supported Employment Title VI Supplement to the State plan:
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
6. Financial Administration of the Supported Employment Program (Title VI):
6.a. The designated State agency assures that it will expend no more than 2.5 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)(H) and (I) of the Rehabilitation Act.
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.

The State Plan must include
7. Provision of Supported Employment Services:
7.a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
7.b. The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

Do you attest that these assurances will be met?

Yes

#### VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

States must provide written and signed certifications that:

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY TITLE IV OF WIOA[1], AND ITS STATE PLAN SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT;

[1] Public Law 113-128.

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

The Designated State Agency is the Vermont Agency of Human Services

2. IN THE EVENT THE DESIGNATED STATE AGENCY IS NOT PRIMARILY CONCERNED WITH VOCATIONAL AND OTHER REHABILITATION OF INDIVIDUALS WITH DISABILITIES, THE DESIGNATED STATE AGENCY MUST INCLUDE A DESIGNATED STATE UNIT FOR THE VR PROGRAM (SECTION 101(A)(2)(B)(II) OF THE REHABILITATION ACT). AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (DESIGNATED STATE AGENCY OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT)[2] AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[3], THE REHABILITATION ACT, 34 CFR 361.13(B) AND (C), AND ALL APPLICABLE REGULATIONS[4], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE TO STATES UNDER SECTION 111(A)

OF THE REHABILITATION ACT ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

ENTER THE NAME OF DESIGNATED STATE AGENCY

Vermont Agency of Human Services, Division of Vocational Rehabilitation (HireAbility Vermont)

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY, OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT, AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[5], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[6], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER TITLE VI ARE USED SOLELY FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES AND THE ADMINISTRATION OF THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

4. THE DESIGNATED STATE UNIT OR, IF NOT APPLICABLE, THE DESIGNATED STATE AGENCY HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE VR PROGRAM IN ACCORDANCE WITH 34 CFR 361.13(B) AND (C);

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE

UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Jenney Samuelson, Secretary Agency of Human Services

8. THE (ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND THE SUPPLEMENT FOR SUPPORTED EMPLOYMENT SERVICES;

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Secretary of the Vermont Agency of Human Services

9. THE AGENCY THAT SUBMITS THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT HAS ADOPTED OR OTHERWISE FORMALLY APPROVED THE PLAN AND ITS SUPPLEMENT.

#### FOOTNOTES

[<sup>1</sup>] Public Law 113-128.

[<sup>2</sup>] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[<sup>3</sup>] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[<sup>4</sup>] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

[<sup>5</sup>] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[<sup>6</sup>] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

#### CERTIFICATION SIGNATURE

**To review and complete the Certification section of the VR portion of the State plan, please select the "Edit" button.**

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Signatory information	Enter Signatory information in this column
<b>Name of Signatory</b>	[Enter the name of authorized representative below]

Signatory information	Enter Signatory information in this column
	Jenney Samuelson
<b>Title of Signatory</b>	[Enter the title of authorized representative below]  Secretary Vermont Agency of Human Services
<b>Date Signed</b>	February 20, 2024

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan’s approval (section 116(b)(3)(A)(iv) of WIOA).

**Effectiveness in Serving Employers**

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter	56.5%	56.5%	57.0%	57.0%

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
After Exit)				
Employment (Fourth Quarter After Exit)	55.5%	55.5%	56.0%	56.0%
Median Earnings (Second Quarter After Exit)	\$6,500	\$6,500	\$6,600	\$6,600
Credential Attainment Rate	53.0%	53.4%	54.0%	54.0%
Measurable Skill Gains	55.0%	57.0%	55.0%	57.5%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

1

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - VOCATIONAL  
REHABILITATION

**EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES**

OMB Control Number 1894-0005 Expiration 02/28/2026

**Section 427 of the General Education Provisions Act (GEPA)** (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

**GEPA Section 427 Form Instructions for State Applicants**

**State applicants must respond to the following four questions:**

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

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***State applicants must respond to four questions.***

***The first of four questions is:***

*Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.*

As a division within the Vermont Agency of Hyman Services, HireAbility must follow all agency policies and procedures regarding:

- Nondiscrimination and grievance



- Accessible and inclusive communication
- Serving individuals with limited English proficiency
- Trauma informed services

In addition, HireAbility has made a substantial commitment and the division level to Diversity, Equity, Inclusion and Access (DEIA). This is reflected in our proposed goal and priority 8. which states:

8. HireAbility will become an organization where; All staff and participants have a sense of belonging & feel welcomed here at HireAbility. Our diverse staff reflect the communities that we serve. Our strong connections with multicultural communities and community partners ensures engagement, successful outcomes, and career pathway opportunities for participants from diverse backgrounds.

The above statement is our vision for HireAbility and our commitment to Diversity, Equity, Inclusion and Accessibility (DEIA). To make this vision a reality, HireAbility worked with a consultant to conduct a needs assessment to identify areas of opportunity and growth. Based on the results, we have identified four areas of focus, and have formed four charter groups made up of diverse cross-sections of staff to do this work in PY 24 and PY 25. The work of each charter groups is as follows:

- Develop a workforce that reflects the diverse populations we serve.
- Effectively reach all populations that are eligible for our services.
- Ensure staff have access to the tools and knowledge and feel able to serve all participants in a culturally responsive way
- Strengthen our existing communication loops to ensure staff are informed and can contribute.

The charter groups will be charged with developing strategies to move HireAbility forward in these areas. They will also help identify metrics for success that are meaningful and measurable.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

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**State applicants must respond to four questions.**

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*Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?*

The mission of HireAbility is to assist eligible individuals achieve competitive integrated employment and meaningful career pathways through training and education. HireAbility participants may face numerous barriers to equitable access to services including:

- Poverty and lack of resources
- Stigma associated with disability
- Racial or ethnic discrimination
- Lack of access to transportation in a rural state
- Low expectations of family members or supporting professionals

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

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**4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?**

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*GEPA 427 - Form Instructions for Application Package*

***State applicants must respond to four questions.***

***The final of four questions is:***

*What is your timeline, including targeted milestones, for addressing these identified barriers?*

As noted, HireAbility has formed charter groups to work on a range of barriers. These groups will develop metrics for improvement over the next three months. Implementation of the strategies are expected to start by July 1, 2024.

**GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - SUPPORTED EMPLOYMENT**

**EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES**

OMB Control Number 1894-0005 Expiration 02/28/2026

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**GEPA Section 427 Form Instructions for State Applicants**

**State applicants must respond to the following four questions:**

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

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PROGRAM-SPECIFIC REQUIREMENTS FOR STATE 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 sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

A. STATE REHABILITATION COUNCIL.

1. ALL VR AGENCIES, EXCEPT FOR THOSE THAT HAVE AN INDEPENDENT CONSUMER-CONTROLLED COMMISSION, MUST HAVE A STATE REHABILITATION COUNCIL (COUNCIL OR SRC) THAT MEETS THE CRITERIA IN SECTION 105 OF THE REHABILITATION ACT. THE DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPLICABLE, HAS:

*Select A or B:*

*(A) is an independent State commission*

*(B) has established a State Rehabilitation Council*

(B) has established a State Rehabilitation Council

2. IN ACCORDANCE WITH ASSURANCE (A)(1)(B), IF SELECTED, PLEASE PROVIDE INFORMATION ON THE CURRENT COMPOSITION OF THE COUNCIL BY REPRESENTATIVE

TYPE, INCLUDING THE TERM NUMBER OF THE REPRESENTATIVE, AS APPLICABLE, AND ANY VACANCIES, AS WELL AS THE BEGINNING DATES OF EACH REPRESENTATIVE'S TERM.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	1	3/1/2024
Parent Training and Information Center	2	3/1/2022
Client Assistance Program	2	3/1/2022
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	1	3/1/2024
Community Rehabilitation Program Service Provider	2	3/1/2023
Business, Industry, and Labor	1	3/1/2024
Business, Industry, and Labor	1	3/1/2024
Business, Industry, and Labor	1	3/1/2022
Business, Industry, and Labor	1	3/1/2024
Disability Advocacy Groups	2	3/1/2023
Current or Former Applicants for, or Recipients of, VR services	2	3/1/2023
Section 121 Project Directors in the State (as applicable)	NA	NA
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	2	3/1/2023
State Workforce Development	2	3/1/2022



Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Board		
VR Agency Director (Ex Officio)	Exempt	Exempt

3. IF THE SRC IS NOT MEETING THE COMPOSITION REQUIREMENTS IN SECTION 105(B) OF THE REHABILITATION ACT AND/OR IS NOT MEETING QUARTERLY AS REQUIRED IN SECTION 105(F) OF THE REHABILITATION ACT, PROVIDE THE STEPS THAT THE VR AGENCY IS TAKING TO ENSURE IT MEETS THOSE REQUIREMENTS.

The SRC is meeting the composition and meeting requirements in Section 105 (b) of the Rehabilitation Act.

4. IN ACCORDANCE WITH THE REQUIREMENTS IN SECTION 101(A)(21)(A)(II)(III) OF THE REHABILITATION ACT, INCLUDE A SUMMARY OF THE COUNCIL'S INPUT (INCLUDING HOW IT WAS OBTAINED) INTO THE STATE PLAN AND ANY STATE PLAN REVISIONS, INCLUDING RECOMMENDATIONS FROM THE COUNCIL'S ANNUAL REPORTS, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION AND OTHER COUNCIL REPORTS.

Report of the Vermont State Rehabilitation Council for the Blind and Visually Impaired - Summary of SRC meetings 2022 and 2023

SRC Involvement in Planning and Evaluating includes Statewide Focus Groups, Performance Data, and Customer Satisfaction Information. The SRC meets in-person every other month and holds executive meetings on the alternate months.

In September 2022, the SRC Executive Committee discussed the agendas for 2023 virtual meetings. The SRC for DBVI will offer recommendations on the WIOA state plan, advise on policy issues, and will be an integral part of planning group for the event Great Expectations and Technology Fair held in April 2023. SRC full council updates will be provided for all members throughout the year. Included in the updates will be OSEP Technology-Based Approaches to Transition Grant, Rural Youth Apprenticeship Development and Pathways to Partnership RSA grant. The entire SRC and DBVI staff meet for an all-day combined meeting each June. In December 2023 the SRC for DBVI submitted specific recommendations for the WIOA state plan.

In September 2022, the SRC Executive Committee recommends regular updates to the SRC related to rural youth apprenticeship development. DBVI RYAD participates in a five-year learning community focused on apprenticeship opportunities for youth. Hosted by UMASS Boston, Institute for Community Inclusion, the partnership includes other states Wyoming, Arkansas, Vermont HireAbility and DBVI, consultation from content experts including partners in Maine BRS. The SRC for DBVI notes there should be more opportunities for credential attainment and apprenticeships for people who are blind or visually impaired. The intent of DBVI to augment consulting in the area of apprenticeship, break down barriers, collectively find companies that could open doors related to apprenticeship for consumers.

The SRC full council discusses three components of apprenticeship: employer, formal training and person who is willing to participate. While formal apprenticeship is lead focus, pre-apprenticeship is also encouraged among national partners. LEAP pre-apprenticeship efforts, particularly Americorps as it includes formal academics and non-profit sectors employment is viewed as a promising model that could be enhanced. DBVI is looking for employers that will hire. Executive council member expresses the concern that people don't understand that apprenticeship is a guaranteed hit for a job – if it is a true apprenticeship, they've got the job.

On February 28, 2023, the DBVI SRC discusses ABLE Library community participation, social isolation, DBVI Policy and Procedures, followed by discussion of LEAP student experiences with Vermont Adaptive Ski and Sports.

#### ABLE Library – Community Participation

SRC and Director of the ABLE library discuss the importance of community participation activities. ABLE library highlights CDC studies on social isolation. Social isolation significantly increases a person's risk of premature death from all causes. Social isolation was associated with about a 50% increase in the risk of dementia. Personal social relationships are associated with a 29% increased risk of heart disease; and a 33 % increased risk of stroke. And not surprisingly, loneliness is associated with higher rates of depression, anxiety and suicide. ABLE library highlights research from physician Vivek Murthy, US Surgeon's General who has studied social isolation extensively, characterizes loneliness as an epidemic in the US, and his research to fight against this epidemic that include:

- Murthy research notes three levels of connection to avoid loneliness: the intimate level with a partner or spouse; the relational level that is the circle of friends; and the collective level that is community. Research identifies humans have evolved to be a part of a community; people want to be part of a shared identity.
- ABLE library book clubs, many programs offered by members and partners on the SRC that act to avoid social isolation are important and essential, as important as the vocational opportunities that we develop. They can be the life-line for some folks.

ABLE has received a large and positive response to accessible youth books, audio books and wonder books. The Department of Libraries is looking to budget more large print books for youth and teens; titles will be added. ABLE is working with Perkins to get more books in Braille on BARD. ABLE has a recording studio. The programs at the library grow community participation and promote life-long learning opportunities in literacy, books, reading and sharing stories that facilitate connection.

#### DBVI General Update and Policy and Procedures

- 704 Report on Independent Living services will be reported to the Administration for Community Living in January 2023.

- Rural Youth Apprenticeship Development (RYAD) group builds relationships with Virginia State counterparts, Human Resources in State Government and discusses career pathway apprenticeship to state government positions.
- HireAbility is reaching out to employers and business account managers to develop a framework and guidance on how to develop an apprenticeship from the ground up.
- UVM and Developmental Services Supported Employment Specialist offers training to DBVI staff from the Post-secondary Education Consortium.
- Montpelier DBVI counselor in Montpelier identifies increases in referrals.
- SRC members are invited to participate in DBVI policy committee to review Policy and Procedures. SRC Executive member representing Vermont Council on the Blind agrees to participate in this review.

April 2023 – The SRC for DBVI full council were integral partners in planning for the Great Expectations and Technology Fair on April 14, 2023. The Executive Committee encouraged the full council to attend in place of the regular SRC full council meeting.

On June 22, 2023, 23 Full Council and DBVI staff attended and reviewed the following Positive Survey Trends from the Market Decisions survey and areas that need work from DBVI Customer Satisfaction Workgroup. Discussion was followed by professional development workshop on communications & customer service provided by Porter Knight of Productivity Vermont. The communications and customer service presentation was followed by a discussion with LEAP students on subject of connection, contribution and mentoring.

The DBVI Customer Satisfaction Workgroup, shared data from Market Decisions Research:

- Positive survey trends: Survey results are generally consistent with 2017 and prior years, but some areas saw notable improvements:
- 97% of VT DBVI consumers report overall satisfaction; the highest rate on record (up from 92% in 2017).
- 97% felt that staff treated them with dignity and respect (up from a low of 95% in 2017).
- 93% report that services met their expectations (continuing a slight upward trend seen in prior years).
- 96% said that staff were helped to achieve their DBVI goals (up from 94% in 2017).
- 91% felt that the services they received helped them become more independent (up from 88% in 2017).
- Areas to watch: Some survey items saw notable declines In 2021:
- 88% were satisfied with choice of available services (down from 92% in 2017 and 96% in 2015).

- 15% report experiencing a problem with VT DBVI services (up from 11% in 2017 and 8% in 2015).
- 56% of those who experienced a problem report the problem was resolved (down from 59% in 2017 and 82% in 2015).

The survey results do not identify any areas of immediate concern or critical need for improvement. The Customer Satisfaction Workgroup Identified that customer satisfaction may be improved with a better communication and productivity. According to the consumers of VT DBVI, their services meet expectations and are highly satisfactory. The most positive areas of experience, according to consumers, are:

- Likelihood to recommend VT DBVI
- Experience with DBVI Staff and Counselors
- Communications with DBVI Staff
- Experience with Services Provided by DBVI
- Outcomes and Meeting Goals
- Accessibility of the DBVI office

Porter Knight from Productivity Vermont offered professional development on communications & customer service to all SRC full council members and DBVI staff on in June 2023. Summary of workshop: Productive communications is a two-way street that requires thought and skill. Ultimately, communicating well is about relationships as much as information. In this workshop participants will learn how to manage your brain to improve its performance and how to keep track of your own commitments and schedule. From there, you can effectively manage expectations and hone your customer service skills. You'll leave this lively, interactive program with tools you can put in place immediately to develop stronger human connections and more productive conversations. Key points:

- Improved customer service involves support for connection, to listen to understand consumers. Our brains tend to gallop ahead, and we can't go wrong by slowing down. Listening to better understand will improve customer service.
- Letting go of attachment can help develop prefrontal cortex.
- Improved cognition, better decision-making can be achieved when the goal is to practice paying attention.
- Meditation equals paying attention.
- List management – get the list out of your head onto a finite space, (e.g. 27 – 33 lines) and move the items onto the calendar.
- Use action verbs, eventually everything on the list is stated as a verb.
- Hold space on the calendar by category.
- Place your genuine intention on the calendar.

- Resist checking email; email is to be done not to be checked so schedule time to sort to “done” and “delete.”
- Fluid movement between tasks recommended when position requires multiple “hats.”
- Porter shares equation: “connection plus contribution minus attachment equals happiness” and ties the presentation to customer service and satisfaction.

Presentation was followed by a discussion with LEAP students on subject of connection, contribution and mentoring.

Action steps. SRC for DBVI full council members recommendations:

- Increase availability of group sessions for DBVI consumers ages 18-55 i.e., job clubs, peer assisted learning, AT groups etc.
- Develop a calendar of events that can be shared with consumers.
- DBVI staff implement identified strategies to augment communication and productivity with consumers.

On August 24, 2023, from 9:00 - 10:00am virtually on Zoom DBVI holds a public hearing is to gather comments on DBVI Policies and Procedures that have been recently updated and reviewed by the SRC.

On October 28, 2023, the SRC reviews the OSEP grant program and Pathways to Partnership RSA new grant initiatives.

- The OSEP grant is a great opportunity to build technology skills of youth who are blind and visually impaired to a high level; technology opens so many doors and options for future.
- DBVI and SRC partners welcome new Project Director, Michelle who started her work on the OSEP grant in the last couple of weeks. Michelle comes to the position with years of working with non-profits.
- First year is a planning year. We will be nailing down what our measures will be and the scope of work for partners.
- LEAP will be incorporating new programming such as AT on demand, checklist and toolkits for Individual Technology Plans for students and enhancing mentoring opportunities.

OSEP Programs Technology-Based Approaches to Transition for Secondary Students with Sensory Disabilities

- Slide One: LEAP CONNECT
- Slide Two: Introducing LEAP Connect, New and Exciting Programming, Assistive Technology Curriculum Enhancements in all programs, AT On Demand in all programs, Mentor Program in all programs, Individualized Technology Plans – ITPs, LEAP Start: 6th-8th Grade College and Career Readiness Training, AT Expert Panel convened bi-annually

- Slide Three: LEAP Connect Outcomes Increase in: Accessibility and participation in pre-vocational and early college experiences in rural and remote areas, Capacity of schools and VR agencies to provide transition services, Collaboration among families, schools, employers, and universities to support successful implementation of transition goals, Inclusion of students in grades 6th – 9th, Acquisition of college and career-related self-determination, social and emotional skills, and assistive technology competencies
- Slide Four: Closing the Loop, Identify Communicate Activate,
- Slide Five: Sustainability Replicability Dissemination

DBVI and SRC discuss Pathways to Partnership updates including the AA-1, project meetings, Statements of Work from each organization, and MOU interagency agreement. The DBVI team has identified December and January as months to complete the Statements of Work (SOW) from each partner. The Pathways to Partnership initiative will have a regular monthly P2P Steering Committee and the larger P2P Leadership Team will meet quarterly. SRC reviews project goals of Vermont's Pathways to Partnership Initiative that include:

- Establish Partnerships and High Performing Systems of Support. VT P2P will form interagency partnerships across an array of stakeholders to establish a comprehensive set of systems and strategies to achieve postsecondary success for youth with disabilities.
- Center Leadership, Advocacy, and Engagement of People with Disabilities and Their Families. Students will be prepared as self-advocates and serve as primary contributors and decision-makers regarding their transition plans and services.
- Improve Career and Post-secondary Outcomes for Youth with Disabilities. VT-P2P demonstration grant will improve employment, community participation and post-secondary education outcomes for youth with disabilities.

AA-1 – DBVI informs SRC that the AA-1 required approval is currently at the AHS Business Office for review. It will then move to the Governor's office, and then to the Joint Fiscal committee of the State legislature.

Statements of Work – Most partners (10 out of 13) have begun to detail Statements of Work that will form grant agreements throughout the disability innovation grant. Highlights include meeting with each of the three school pilot sites who have begun to identify key project work in the areas of:

- Students in high school level (and at younger ages) lead transition plans;
- Outreach and communication with youth, families and school to work transition coordinators in each district;
- Innovation in independent living goals, objectives and life skills programs;
- Enhancements of the new DBVI Transition Coordinator positions, high level of professional development and training in supported employment and customized employment;
- Establishing new apprenticeship opportunities;

- Improving transitions to Developmental Services and adult agencies;
- General education and special education coordination (e.g. identifying key access/opportunity points in general regular education and special education etc.); and
- Enhanced relationships with employers and the community.

The pilot sites will be supported with innovations from the Vermont Center for Independent Living, Vermont Family Network, University of Vermont Center on Disability and Community Inclusion, the Vermont Developmental Disabilities Council, the Green Mountain Self Advocates, ReSource and Griffin-Hammis among all other partners. All will be critical to the grant. We look forward to high level of training in job development, peer to peer connections, supported employment and customized employment that will energize innovation at the local level and impact the experience of young people.

In December 2023, the DBVI SRC discusses full council updates followed by discussion of WIOA state plan goals and strategies, with specific recommendations from the SRC.

Vermont Association for the Blind and Visually Impaired (VABVI):

- VABVI with DBVI participated in White Cane Awareness Day events throughout the state including Burlington, Londonderry, Montpelier, Rutland, Springfield and St. Albans among other locations in October.
- Outreach event for new Americans within Somali community has included VABVI staff, the Lions Club, Jeff Young, UVM Medical Center and ocular pressure testing for glaucoma was provided. 27 people attended, 11 had follow-up visits with their doctor, and one is being treated for glaucoma due to this effort. Four more events are planned for early next year.
- Fully staffed with new UMASS graduate hired to serve Northeast Kingdom.
- Children services update: Early Intensive Residential Life Experience, three-day camp was attended by 13 youth at Rockpoint Center offering youth ages 8-18 the opportunity to meet and mentor with each other.
- VABVI is updating their strategic plan which is done every five years.

ABLE Library Update:

- In response to feedback from ABLE's latest customer satisfaction survey, the library is increasing the number of newsletters sent out to patrons to 4 times a year. The newsletter is available through email, large print, and audio formats.
- ABLE offers a new program called BARD Basics in January, where patrons will participate in a high-level overview of what BARD is and how to sign up for it.
- ABLE is also offering an assistive technology training for public library staff around the state in January.
- The ABLE book club is going well; the next discussion will be in January, and there is good participation from patrons.

- The National Library Service is testing the feasibility of voice user interface options to listen to NLS materials. Around 400 patrons are currently testing using Amazon's Alexa product to play back NLS materials.
- NLS continues to test their new digital talking book machines, which will be able to play the existing digital cartridges, as well as connect to WiFi so that patrons can download books directly to the device.
- ABLE added about 100 new Wonderbooks to the Accessible Youth Collection, including SRC member Jerry Doody's request for Holiday books. The Wonderbooks are picture books and chapter books that have an attached audio player so that readers can listen to the book while following along with the print and pictures.

#### Client Assistance Program:

- CAP is working with HireAbility and Griffin Hammis to develop self-employment, create and revise policy with RSA.
- HireAbility will offer training on self-employment to all staff and one staff member within each region will be offered more training.
- Guidebook for participants as well as staff is being developed. CAP has advocated for consumers to be included in the development of the guidebook.
- CAP has done outreach to DBVI staff and HireAbility and plans to do outreach for New Americans and to re-establish clinic offerings.

#### Vermont Council of the Blind:

- VCB offers a range of opportunities for social gatherings to decrease isolation and recently offered a Holiday party in Colchester.
- VCB is working to ensure audiodescription is available at Northern Stage in WRJ and recently traveled to the theater and local restaurants in WRJ.
- Train is another way to travel, and we want to encourage VCB members to think about this as a possible support.
- Wizard of Oz in April at the Flynn will be audio described.

#### Vermont Center for Independent Living:

- VCIL office in Montpelier is still working through the recovery from the floods, with office space across the street at the Civic Center and remote work.
- Received a grant from ACL in November to provide Covid vaccinations to people who are immunocompromised
- New staff include a pandemic coordinator and a long covid specialist.
- There is a new long term covid support group in Bennington.

#### DBVI update



- Pathways to Partnership is going through the process with Joint Fiscal, the AA-1 is at AHS and will move to the legislative committee. Staff have been coordinating with partners to work on grant agreements, specifications of work and deliverables.
- OSEP Resource grant is exciting as it impacts the technology available for our BVI students, and in turn may impact career path and technology in the LEAP Program.
- DBVI is recruiting for on VR Counselor position for the Burlington office.

#### State Plan Goals and Priorities

On December 21, 2023, the full SRC for DBVI reviewed DBVI's progress towards achieving the goals and priorities for Program Year 2023. The SRC full council recommended new strategies to assist DBVI to reach stated goals. The recommendations are summarized here and detailed to in attachment "o. The methods to be used to expand and improve services to individuals with disabilities" within the WIOA state plan.

In December 2023, the SRC for DBVI recommends the following strategies to maximize DBVI outcomes under the WIOA Common Performance Measures.

- SRC recommends DBVI reach out to VRTAC and other schools for the blind to learn about vocational and other practical assessments i.e., Mississippi TAC, Hadley School for the Blind etc;
- Job Accommodation Network for assistive technology; and
- Griffin-Hammis professional development about customized employment/career assessments.

SRC for DBVI recommends the following additional strategies to coordinate efforts with the Vermont Department of Labor (VDOL) and the Agency of Education (AOE) to ensure that blind and visually impaired individuals have access to employment training and other components of the workforce system (Goals 2 and 4):

- DOL trainings on dual enrollment with DBVI.
- Continue to explore apprenticeships with HireAbility and DOL. Connect with BAMS and explore businesses interested in apprenticeships.

SRC for DBVI recommends that DBVI add the following strategies to expand employer outreach and engagement efforts through Creative Workforce Solutions (CWS) to effectively meet the needs of employers (Goals 1 and 6):

- SRC recommends DBVI reach out to Vermont State Employee Credit Union and share with Nat Piper, short staffed and hired outside company to answer phones. Reach out strategy-Gorilla Marketing

The SRC recommends DBVI add the following strategy to assist DBVI consumers to retain or advance in employment (Goals 1, 2, 3 and 4):

- Reach out to Intellectual Point: IT training and certifications, <https://intellectualpoint.com/>

The SRC recommends DBVI add three strategies to continue to develop and expand services for underserved populations including individuals who require supported employment through partnerships, grant and funding opportunities. Goals 2 and 7.

- Pathways to Partnership Grant, over the next 5 years
- Specialize Support Program through VANCRO.
- ABLE Newsletter to add information

The SRC recommends DBVI add three strategies to continue Improve Outcomes for Students and Youth. Goal 5.

- Add language around the OSEP Grant
- VT Pathways to Partnership Grant
- Explore apprenticeships, RYAD collaborative

**The SRC recommends DBVI add the following strategies to continue 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.” Goals 1 and 6:**

- **Card table with Legislatures and partner with VABVI/HireAbility**
- **Pathways to Partnership grant: Vermont Family Network- development of videos/short clips**

On December 21, 2023, the SRC recommends DBVI add the following strategies to assist DBVI to create Consumer Driven Events to assist individuals as they prepare for employment (Goals 1 and 2):

- Create a calendar for consumers and DBVI staff that has all of these events in one location. Add it to the P2P Website.
- Create a quarterly work employment group to meet virtually.

On December 21, 2023, DBVI SRC discusses participation in planning Nov 13-15 2024, Vermont annual North East Association of Education and Rehabilitation (NE-AER) conference at the Spruce Peak Lodge in Stowe, VT. AER is a professional membership organization dedicated to the professionals who work with people who are blind/ visually impaired. This three-day conference will have various breakout sessions with teachers and speakers from around the country, but with a main focus of attendees and presenters from the northeast. There will also be a keynote speaker, vendors and an award ceremony banquet dinner. Vermont partners are eager to make the experience as welcoming and accessible as possible. To make this happen committees include:

- The Host Committee: Provides information on local activities, speaker gifts, banquet favors;
- The Registration Committee: creates conference rates with conference committee, print programs, obtain tote bags, staff the registration table;

- The Accessibility Sub-Committee: ensures conference materials are in accessible format, find dog relief area, ensure hotel is accessible, create tactile maps of hotel;
- The Exhibit Sub-Committee: generate a vendor list, set vendor fees, acquire donations, determine layout of exhibit room; and
- The Prize/Raffle Subcommittee: obtains donated gifts, support state basket raffles.
- SRC members are invited to participate in committees. Each committee has one lead committee member who is in charge of managing the committee and outcomes. Each committee already has a lead so you will be joining to support the outcomes throughout the year from now until November.

Action steps, SRC recommendations:

- DBVI workshop on partnerships such as VABVI, vision rehabilitation therapists, and orientation and mobility instructors, assistive technology evaluation
- LEAP student workshop
- Workshop recommended on ABLE library and social isolation
- DBVI SRC recommends SRC members to participate in committees.

Overview of the CSNA Timeline:

- Dec. 2022 (Discussion with the SRC about DBVI Goals).
- February and April 2023 (Continue planning with the SRC).
- June 2023 (Hold a combined meeting with the SRC, DBVI Staff and key Partners to discuss Needs).
- July 2023 Policies and Procedures Public Hearing with SRC
- July 2023 Needs identified within Pathways to Partnership RSA submission
- Conduct Summer Surveys of Teachers of the Visually Impaired and Adult Service Providers.
- Sept. 2023 (Hold a Consumer-Driven Event).
- October 2023 (Hold White Cane Events).
- December 2023 (SRC offers recommendations to DBVI Goals and Strategies).

Goal 1. DBVI will align services to support consumers in achieving the WIOA Common Performance Outcome Measures.

SRC member recommendations:

- DBVI will consider the use of zoom to deliver career assessments online, and to offer training opportunities for DBVI clients to access and interact with zoom and other online platforms.
- The focus on how to remove the barriers within the assessment would be priorities.

Goal 2. DBVI will increase the percentage of consumers earning more than minimum wage at closure.

- This goal and the indicators related to it are based on the state minimum wage.

No additional recommendations were made under goal 2.

Goal 3. DBVI will increase consumer opportunities to participate in post-secondary education and training and gain industry recognized credentials.

SRC member recommendations:

- DBVI will look at longitudinal data under this goal as an ongoing strategy. Of those students who start post-secondary education and training, how many finish.
- SRC specifically recommends looking at flexible pathways and dual enrollment opportunities for students.
- Agency of Education agrees that the dual enrollment is a good data point. AOE will put forward a data request – historically a low number of students with disabilities are accessing the dual pathway, and Vermont would like students on IEPs and 504 plans to access dual enrollment to the greatest extent possible.
- Vermont Council of the Blind recommends specific industry recognized credentials may not solely relate to the college degree, citing the importance of IT credentials for employers as one example; this recommendation could be included in the longitudinal data recommendation of this section, above.

Goal 4. In partnership with VDOL and Community Partners, DBVI will create more opportunities for DBVI consumers to participate in training programs.

SRC member recommendations:

- DBVI will find and improve access to new apprenticeship opportunities for individuals who are blind and visually impaired, that are not the typical construction, plumbing and heating pathways.
- SRC members discussed history of stipend and minimum wage offering through DVR, DBVI and DOL programs, in collaboration with DOL, Resource and VABIR partnerships.
- Vermont Department of Labor shared history of stipends, Fair Labor Standards Act, and DOL programs that offer minimum wage. DOL has had a history of paying wages, minimum wage for participants.
- DBVI will continue to develop the partnerships with VABIR, Resource, DOL and other entities.

Goal 5. DBVI will continue to implement highly effective Pre-Employment Transition Services (Pre-ETS) for students statewide.

- DBVI works to achieve outcomes in five core areas under WIOA through Learn, Earn and Prosper, LEAP program. The menu of options available to students through LEAP are available statewide. This year, summer residential option will be available.

- Vermont is fortunate to have structure of DBVI collaboration with VABVI to have 14 teachers for the Visually Impaired in the schools versus other states where each school district hires their own teachers.

SRC member recommendations:

- DBVI will continue to coordinate with Vermont Center for Independent Living to provide self-advocacy training and workshops for youth. VCIL has provided weekly workshops over 5 weeks in coordination with DBVI's LEAP program, last year. DBVI looks forward to continued collaboration in the LEAP program over the next year.
- TVI's recently participated in Market Decisions research forum. While that data is being compiled, TVI's specifically want to hear from DBVI staff in the beginning of each school year.
- DBVI will incorporate opportunities for students being taught about their disability (submitted by CAP).
- DBVI will support youth to practice self-advocacy skills and how it impacts the employment environment (submitted by Vermont Family Network).
- SRC discusses importance of helping to incorporate braille study in IEP, DBVI counselor participation in IEP meetings can assist in this effort (VCIL initiates this discussion).
- AOE adds that anything that can help students can be included in the IEP
- VABVI serves 300 students, 20-25 students have braille written within the IEP. It can sometimes be a challenge to get the student a family to agree that Braille instruction is needed.

Goal 6. DBVI will continue to expand efforts to effectively serve employers through Creative Workforce Solutions (CWS).

No additional recommendations were made under goal 6.

Goal 7. DBVI will continue to seek opportunities to expand and/or improve services for underserved populations including individuals who need supported employment.

- DBVI coordinates with designated state agency (DSE) for students who meet the criteria of the DSE and has a separate partnership with CCS in Chittenden County.

No additional recommendations were made under goal 7.

Goal 8. Consumer satisfaction with DBVI services will be maintained or increase.

- Market Decisions research is being compiled for 2022-2023

No additional recommendations were made under goal 8.

**5. PROVIDE THE VR AGENCY'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS, INCLUDING AN EXPLANATION FOR THE REJECTION OF ANY INPUT AND RECOMMENDATIONS.**

List each recommendation/input followed by the VR agency response

DBVI agreed with all SRC recommendations as explained in Section a. 4.

## B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA).

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

### 1. THE VR SERVICES NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, INCLUDING:

#### A. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES AND THEIR NEED FOR SUPPORTED EMPLOYMENT;

### **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 calendar year 2021, 2022, 2023. The following summary of the CSNA is being used to develop many of our goals and strategies for PY 2024 and PY 2025.

#### **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; and Counselor input;
- State level statistics from other federal programs; WIOA, IEP, 504, Social Security,
- State and local data and reports;
- Stakeholder input: Surveys, focus groups, SRC meetings, interviews, Vermont Employer Awareness Summit, Customer—Centered Culture Focus Groups, and public hearings.
- Meetings and surveys with the statewide network of Teachers of the Visually Impaired.
- Statewide Customer Satisfaction and Needs Assessment Survey conducted by Market Decisions— The current survey began in December 2021 and the final report will be

complete at the end of March 2022. The full results and report will be included in the CSNA for CY 2021-2023.

- Review of Journal of Visual Impairment articles by DBVI staff, 2011 to 2023
- 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.
- Research and critical needs identified by Pathways to Partnership Grant lead partners including DBVI, the Center on Disability and Community Inclusion, University of Vermont, Vermont Developmental Disabilities Council, VCIL, Vermont Family Network, HireAbility and Agency of Education, Federal grant awarded by the Rehabilitation Services Administration October 2023.

## **Results**

### **Current Population Survey**

**Prevalence Rate** (Disability at the Vermont Population Level): In 2020, the percentage of a man and a woman, aged 18-64 who report a disability in Vermont is 13.7 percent.

**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 was 53% in 1981 and 24% in 2014. No current data is available.

**Employment Rate:** In 2021, the percentage of non-institutionalized Vermonters ages 18-64 years with who were employed full-time/full-year in the previous year was 38.1%.

Erickson, W., Lee, C., VonSchrader, S (2021). Disability Statistics from the 2018 American Community Survey (ACS). Ithaca, NY: Cornell University Yang-Tan Institute (YTI). Cornell University Disability Statistics website: [www.disabilitystatistics.org](http://www.disabilitystatistics.org) (Links to an external site.)

### **2021 Disability Status Report--Vermont**

#### **Summary of Overall United States and Vermont Data**

**Age--**In 2021, the prevalence of disability in the United States was:

- 13.0 percent for persons of all ages
- 5.8 percent for persons ages 5 to 15
- 7.6 percent for persons ages 16 to 20
- 10.9 percent for persons ages 21 to 64
- 23.9 percent for persons ages 65 to 74

- 46.1 percent for persons ages 75+

**Age**--In 2021, the prevalence of disability in the Vermont was:

- 13.4 percent for persons of all ages
- 4.4 percent for persons ages 5 to 15
- 12.7 percent for persons ages 16 to 20
- 11.0 percent for persons ages 21 to 64
- 19.5 percent for persons ages 65 to 74
- 43.6 percent for persons ages 75+

**Disability Type**--In 2021, the prevalence of the six disability types among persons of all ages in the United States was:

- 2.5% reported a Visual Disability
- 3.6% reported a Hearing Disability
- 6.6% reported an Ambulatory Disability
- 5.4% reported a Cognitive Disability
- 2.4% reported a Self-Care Disability
- 5.7% reported an Independent Living Disability

**Disability Type**--In 2021, the prevalence of the six disability types among persons of all ages in Vermont was:

- 2.1% reported a Visual Disability
- 4.4% reported a Hearing Disability
- 5.8 % reported an Ambulatory Disability
- 5.6% reported a Cognitive Disability
- 2.2% reported a Self-Care Disability
- 5.7% reported an Independent Living Disability

**Gender** - In 2021, 12.6 percent of females of all ages and 14.3 percent of males of all ages in Vermont reported a disability.

**Hispanic/Latino** - In 2021, the prevalence of disability among persons of all ages of Hispanic or Latino origin in the United States was 10% and the prevalence of disability among persons of all ages of Hispanic or Latino origin in Vermont was 4.7 percent.

**Race** - In 2021, in the United States, the prevalence of disability for working-age people (ages 21 to 64) was:

- 11.1 percent among Whites



- 13.8 percent among Black / African Americans
- 5.0 percent Asian
- 10.3 percent among persons of some other race(s)

**Race**--In 2021, in Vermont, the prevalence of disability for working-age people (ages 21 to 64) was:

- 11.0 percent among Whites
- 9.5 percent among Black /African Americans (Note in 2018 5.6 percent among Black / African Americans )
- 3.6 percent Asian (Note in 2018, 0.8 percent Asian)
- 13.9 percent among persons of some other race(s)

### **Populations in Households in Vermont**

Vermont's population of 643,077 people grew 2.8% over a decade from 2010 to 2020. Content provided by the US Census bureau for 2020.

Census Population Demographics for Vermont. <https://www.census.gov>

- Ages 15 to 19 = 42,255
- Ages 20 to 24 = 45,692
- Ages 25 to 29 = 37,764
- Ages 30 to 34 = 36,441
- Ages 35 to 39 = 36,243
- Ages 40 to 44 = 34,595
- Ages 45 to 49 = 37,960
- Ages 50 to 54 = 42,625
- Ages 55 to 59 = 47,190
- Ages 60 to 64 = 48,408
- Ages 65 to 69 = 41,633
- Ages 70 to 74 = 31,766

### **Number of Individuals who are minorities**

- Total population of Vermont =643,077
- White- 584,360
- Two or More Races=17,135
- Hispanic or Latino=9,208

- Asian=10,126
- Black or African=7,964
- American Indian=1,873
- Another Race=2,677
- Two or More Races= 17,135
- Native Hawaiian=98

### **Summary of Visual Disability Data in Vermont**

This CSNA references estimates for working age adults by the US Census bureau as well as data from the American Community Survey which provides us with specific data for visual disability.

#### **Working Age Adults**

Based on 2021 ACS data, DBVI estimates that there are approximately 4,960 Vermonters of working age (18-74) who are blind or severely visually impaired. DBVI estimates a conservative estimate of total numbers due to preliminary MMIS data review. DBVI provides RSA defined services to approximately 5.6% of these individuals annually (283 in SFY23).

**Visual Disability Total= 13,504. This represents 2.1% of 643,077 Vermont population**

**Ages 18-75 = 4,960** - Vermonters of working age who are blind or visually impaired.

American Community Survey 2021.

#### **Employment Rate**

In 2021, data from the American Community Survey references the following employment rates of non-institutionalized working-age people (ages 18 to 64) with disabilities in Vermont.

- In 2021, the employment rate of working-age people with disabilities in VT was 38.1 percent.
- In 2021, the employment rate of working-age people without disabilities in VT was 79.4 percent.
- The gap between the employment rates of working-age people with and without disabilities was 41.3 percentage points.

#### **Gap and Needs--Employment Rate--Visual Disability**

- In 2021, the employment rates of working-age Vermonters with a visual disability, ages 21 to 64, was 26.2%.
- In 2021 the employment rate of working-age Vermonters without disabilities, ages 21 to 64 was 60.6%.

- This illustrates a gap between the employment rates of working age Vermonters with and without a visual disability of 34.4 percentage points.
- In 2021 over half of working-age Vermonters with a visual disability, ages 18 – 64 were not employed in Vermont.
- There is also a specific need to connect individuals with multiple disabilities to the Developmental Disability Agencies to determine eligibility while students are still in high school. Vermont rules require that students meet the disability eligibility requirement and have a job before leaving high school to qualify for the waiver. DBVI staff work closely with IEP teams to make sure students with multiple disabilities are assessed for Developments Services eligibility while in high school. DBVI has recently underspent funds for student supported employment because of the efforts to connect high school students directly with the Designated agencies. This is an effective strategy to meet the supported employment needs of eligible students on the DBVI caseload.

### **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 2021 in Vermont, the percentage of working-age people with disabilities who were not working but actively looking for work was 8.2 percent.
- In 2021 in Vermont, the percentage of working-age people without disabilities who were not working but actively looking for work was 16.8 percent.
- The difference in the percentage of not working but actively looking for work between working-age people with and without disabilities was 8.6 percentage points.

### **Gap and Needs--Not Working but Actively Looking for Work--Visual Disability**

- In 2021, the percentage of working-age Vermonters with a visual disability who were not working but actively looking for work was 1.0 percent.
- The percentage of working-age Vermonters without disabilities who were not working but actively looking for work was 14.8 percent in the same year.
- The difference in the percentage of not working but actively looking for work between working-age Vermonters with a visual disability and without disabilities was 13.8 percentage points.
  - **Caution:** Estimate based on small sample size (less than 40 individuals).

### **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 2021, the percentage of working-age people with disabilities working full-time/full-year in Vermont was 18.8 percent.

- In 2021, the percentage of working-age people without disabilities working full-time/full-year in Vermont was 60.6 percent.
- The difference in the percentage working full-time/full-year between working-age people with and without disabilities was 41.8 percentage points.

### **Gap and Needs: Working Full-Time/Full-Year: -Visual Disability**

- In 2021, the percentage of working-age people with a visual disability working full-time/full-year in Vermont was 26.2 percent, and the percentage working full-time/full-year without disabilities was 60.6%.
- This marks a difference in the percentage working full-time/full-year between working-age Vermonters with a visual disability and without disabilities of 34.4 percentage points.

### **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 2021, the median earnings of working-age people with disabilities who worked full-time/full-year in VT was \$46,300.
- In 2021, the median earnings of working-age people without disabilities who worked full-time/full-year in VT was \$53,600.
- The difference in the median earnings between working-age Vermonters with and without disabilities who worked full-time/full-year was \$7,300 annually.

### **Gap and Needs--Annual Earning--Visual Disability**

- The difference in the median earnings between working-age people with a visual disability earned \$40,500 and people without a disability earned \$53,600 showing that people with a visual disability earned \$7,100 less annually than people without a disability.

\*Caution: Estimates for visual disability is based 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 2021, the poverty rate of working-age people with disabilities in VT was 32.4 percent.
- In 2021, the poverty rate of working-age people without disabilities in VT was 8.4 percent.
- In 2021, the difference in the poverty rate between working-age people with and without disabilities was 24 percentage points.

### **Gap and Needs—Poverty—Visual Disability**

- In 2021, the difference in the poverty rate between working-age people with a visual disability (10.6%) and without disabilities (8.4%) was 2.2 percentage points
- In 2021, approximately 1,934 out of 4,960 people with a visual disability who are working age live in poverty in Vermont.
- In 2021, the percentage of non-institutionalized persons ages 21-64 years with visual disability, in the Vermont who were living below the poverty line in 2021 was 39 percent.

### **Education Level**

- In 2021, in Vermont, age 21 to 64 years with a visual disability have an educational attainment of less than high school education = 656 (19.2% of 3,365)
- In 2021, in Vermont, age 21 to 64 years with a visual disability with a high school diploma or equivalent = 972 (28.9% of 3,365)
- In 2021 in Vermont age 21 to 64 with a visual disability with some college/associates degree = 892 (26.5% of 3,365)
- College Bachelor Degree or higher = 854 (25.4% of 3,365)

### **Gap and Needs—Education Level--Visual Disability**

- The majority of individuals with a visual disability do not get a college degree.

### **United States and Vermont Data -**

- Vermont DBVI met with Data Analyst from Disabilities, Aging and Independent Living and reviewed empirical data from researchers Flaxman, A. D. et al. 2021, in JAMA Ophthalmology.
- In the United States, recent empirical data from the Vision and Eye Health Surveillance System from the CDC suggest higher estimates of vision loss and blindness than were previously reported (Flaxman, A. D, et al. 2021).
- In the United States, consensus of definition of blindness and vision loss in youth and adult populations is needed to identify the scope of needs and to promote specific models (Flaxman, A.D, et al. 2021).
- In Vermont, DBVI will continue to work with Disabilities, Aging and Independent Living, Data Analyst to review empirical data and refine MMIS data for youth and older blind populations at the Medicaid claims level among other data sets.

Flaxman, A. D., Wittenborn, J. S., Robalik, T., Gulia, R., Gerzoff, R. B., Lundeen, E., Saaddine, J., & Rein, D. B. (2021). *Prevalence of Visual Acuity Loss or Blindness in the United States: A Bayesian Meta-analysis*. JAMA Ophthalmology.

### **Vermont MMIS Data -**

In July 2021, DBVI obtained Vermont MMIS Data for Annual Needs Assessment and Reporting. DBVI consultations with Data Analyst, Disabilities, Aging, and Independent Living (DAIL).

**Report Description:** This report includes data aggregated from the Vermont Medicaid Management Information System (MMIS) examining Vermont Medicaid claims with the primary diagnosis of one of five vision related disorders as defined by the ICD-10 criteria. Data in this report include claims with beginning dates of service from 07/01/2020 to 06/30/2021.

**Data Analysis Information:** Data were extracted from Gainwell's Claims Analysis View Universes using the web-based Business Intelligence tool (WebBI) on 11/24/2021 by Leslie C. Johnson. Limiting parameters for all data extracts include:

1. Dates of Service: 07/01/2020 to 06/30/2021
  2. Claim Status: 6 (paid claims)
  3. Recipient Date of Birth: less than or equal to 07/01/2006
  4. Provider Address Type: 04 (physical address)
  5. Diagnosis Codes: ICD-10 codes for primary diagnostic categories of Age-Related Macular Degeneration, Glaucoma, Diabetic Retinopathy, Cataract, Amblyopia/Strabismus, Refractive Errors, and Low Vision/Blindness (excluding diagnosis with one "normal vision" eye)
- **Data Analysis Information:** Data were extracted from Gainwell's Claims Analysis View Universes
  - **Data Analysis Method:** Raw data were aggregated using IBM's SPSS. Resulting analyses on pages 2-5 of the report show the number of total unique people for whom claims were submitted with primary diagnoses in the categories indicated at the state and county-levels. Cell sizes of less than 11 people are denoted as "<11" per CMS federal reporting guidelines.

#### **Diagnoses Identified as Top Associated with DBVI Programs/Services:**

- **Primary Diagnosis** of Age-Related Macular Degeneration, Glaucoma, Diabetic Retinopathy, Cataract, or Low/Vision Blindness: Total Unique People=5686
- **Primary Diagnosis** of Refractive Errors: Total Unique People=12254
- **Primary Diagnosis** of Low Vision (both eyes affected): Total Unique People 173

#### **Customer Satisfaction Data—Key Findings and Discussion**

##### **Statewide Survey**

Market Decision Research has been working with DBVI for over a decade to conduct its tri-annual customer satisfaction survey. The VT DBVI Consumer Satisfaction Survey is designed to allow consumers the opportunity to provide feedback about the services they are currently receiving or received in the past. The survey instrument for this research was developed jointly between the Vermont Department 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. It was modified to capture additional details and reflect services as they're provided under DBVI's current hybrid remote/in-person service model.

The current survey began in December 2021 and the final report was made available in March 2022. The original plan was to have the survey conducted in CY 2020, however, there were delays due to the timing of Covid-19. Many DBVI consumers were socially isolated during this time period and the decision was made to postpone the survey until 2021.

#### Positive survey trends:

Survey results are generally consistent with 2017 and prior years, but some areas saw notable improvements:

- 97% of VT DBVI consumers report overall satisfaction; the highest rate on record (up from 92% in 2017).
- 97% felt that staff treated them with dignity and respect (up from a low of 95% in 2017).
- 93% report that services met their expectations (continuing a slight upward trend seen in prior years).
- 96% said that staff were helped to achieve their DBVI goals (up from 94% in 2017).
- 91% felt that the services they received helped them become more independent (up from 88% in 2017).

#### Areas to watch:

Some survey items saw notable declines in 2021:

- 88% were satisfied with choice of available services (down from 92% in 2017 and 96% in 2015).
- 15% report experiencing a problem with VT DBVI services (up from 11% in 2017 and 8% in 2015).
- 56% of those who experienced a problem report the problem was resolved (down from 59% in 2017 and 82% in 2015).

The survey results do not identify any areas of immediate concern or critical need for improvement. According to the consumers of VT DBVI, their services meet expectations and are highly satisfactory. The most positive areas of experience, according to consumers, are:

- Likelihood to recommend VT DBVI
- Experience with DBVI Staff and Counselors
- Communications with DBVI Staff
- Experience with Services Provided by DBVI
- Outcomes and Meeting Goals
- Accessibility of the DBVI office

### Focus Groups:

Market Decisions Research worked with VT DBVI in 2021 to conduct a series of focus groups with DBVI staff, teachers of the visually impaired (TVIs), and members from the Vermont Rehabilitation Council. Three focus groups, each lasting approximately two hours, were conducted on December 16, 2021, January 7, 2022, and January 14, 2022. The groups were facilitated using Microsoft Teams. Each group was recorded and transcribed for analysis. These groups were conducted with the goal of exploring in detail barriers to services, communication topics, personal experience with DBVI, and what tools or services are needed in the future for consumers. Key findings include:

- Key Finding 1 – Communication: All groups agree the top qualities of strong client communication are partnership, individualization, consistency, and flexibility. Participants believe counselors and staff are adaptable with each client and the COVID-19 pandemic has created positive opportunities for new types of communication.
- Key Finding 2 – Barriers: The most common barriers to DBVI services are acceptance of disability, lack of public transportation, access to information, knowing where to start, awareness from the public, and stigmas associated with disabilities.
- Key Finding 3 – Tools and Needs: The most pressing needs talked about in the groups were transportation solutions, apprenticeship opportunities, mentoring, and DBVI working within the community.
- Key Finding 4 – Technology: Many agree that since the beginning of COVID-19, there have been new and exciting technology opportunities. Each group discussed the need for more education for clients regarding assistive and mainstream technology.
- Key Finding 5 – Client Motivation: The Council group say even though there are barriers, clients work hard and once they are ready, they work to the fullest capability. DBVI staff and TVI groups believe there are many reasons clients and students are not trying their best, including fear of losing benefits, insecurities in personal capabilities, negative past experiences with former employers, and enablement from family and the education system.

These survey results were presented to the State Rehabilitation Council at the June 2023 SRC Full Council & DBVI Annual Meeting. Following this presentation, Porter Knight from Productivity Vermont conducted a workshop on Communications & Customer Service. The focus was on productive communication as a relational skill, emphasizing the management of brain performance and personal commitments. Participants learned strategies to enhance customer service and build stronger connections. Key takeaways included the importance of letting go of attachment for prefrontal cortex development, the equation for happiness (connection + contribution - attachment), and the benefits of improved cognition through practicing attention, exemplified by meditation. Practical tools for effective list management, such as using action verbs and scheduling tasks on the calendar, were highlighted. Additionally, the workshop advised resisting constant email checking, emphasizing scheduling specific time for sorting and responding. Lastly, fluid task transitions were recommended for roles requiring diverse responsibilities. DBVI Leadership aligned the presentation with the core principles of



customer service, emphasizing the importance of fostering meaningful connections and actively listening to better comprehend consumer needs.

### **Pre—Employment Transition Skills Planning**

#### **Includes:**

- Statewide Survey of all Teachers of the Visually Impaired.
- Statewide survey sent to all students.
- Data-Mapping of Child Count data.
- Calculation of current Pre-ETS Expenditures and Forecasting of future needs.

### **Statewide Survey of all Teachers of the Visually Impaired in Vermont— Survey Results December 13<sup>th</sup> 2023.**

What needs do your students have in job exploration counseling?

Most Common Responses:

- Being exposed to a variety of job options
- Self-determination/advocacy skills
- Understanding how assistive technology devices and software applies to jobs
- an understanding of realistic job consequences.
- Job development skills that include resume development, interested inventories, job shadows, interviewing, and job shadows.
- More education around jobs: understanding of responsibilities and skills needed.
- Exploration of customized employment and supported employed options.

Key needs:

- “Transition aged students would benefit from job exploration counseling that profiles jobs and careers which adult DBVI clients have chosen and been successful in. Highlighting the vocational supports and strategies that helped them realize their goals would be a helpful illustration of what is possible when students access resources available to them”

In your experience, what skills do students need to be prepared for work experiences?

Most Common Responses:

- Problem solving skills
- Interpersonal skills
- Assistive technology skills
- Time management

- Organization skills
- Realistic expectations
- Social skills
- Self-advocacy skills

#### Key Needs

- “While certainly not needing comprehensive skills, students should be conversant with assistive technology experience as it relates to their vision needs. This includes basic end user computer skills. Oral and written communication skills are an important element for continued growth in interpersonal and social skills as they relate to the world of work, whether peer-to-peer co-worker relationships and customer relations.”

How are your students' strengths and weaknesses currently assessed in the area of work-based learning?

#### Most Common Responses:

- Observation by professionals
- LEAP and DBVI programs provide this information.
- Unclear.

#### Key Needs:

- “Strengths and areas of need are assessed through skills based inventories and anecdotal evidence provided by educational and pre-vocational service providers and support staff. Observations made by TVI visits also augment these assessments.”

What would help your students learn more about post-secondary options? Is there anything DBVI could do in order to help?

#### Most Common Responses:

- Provide more exposure and education around the various options.
- Resources with lists of different careers, tech programs, colleges, etc.
- Tours of local colleges, assistance with applications, and workplace visits
- More action around hand on experience with job shadows, interviewing, work-based learning.

#### Key Needs:

- “Escorting transition-aged clients to career and college fairs to facilitate access to such community events. Providing guidance on DBVI client ideas and impressions, plus providing reflective feedback to help clients crystallize and prioritize short term objectives and long-term goals could be of critical support.”

What skills do your students need to be prepared for post-secondary education?

Most Common Responses:

- Self-advocacy skills
- Technology skills
- Organization and time management skills
- Confidence building opportunities
- Work together with support team

Key Needs:

- “Similar to work-based needs, Awareness of and use of assistive technology solutions, solid communication skills, time and personal management skills, interpersonal and social skills. Certainly if attending centers of post-secondary education away from home and natural supports then Orientation & Mobility skills, transportation access skills and self-care & personal hygiene skills will be paramount.”

What do your students need to get ready for employment?

Most Common Responses:

- Socialization
- Hands on experiences
- Explore more job opportunities and work based learning experiences in multiple areas of work.
- Time management
- Technology skills
- Support employment options and exploration.

What job readiness skills do you think your students need to succeed in the workplace?

Most Common Responses:

- Supported employment and customized employment options
- Understanding of daily living skills in order to become employed.
- Time management skills
- Organization skills
- Technology skills
- Self-motivation
- Social skills

Key needs:

- “Job readiness would be closely related work readiness prerequisite skills. In addition to those being prepared and open to job training would be constructive. Being a team player and goal orientated are real difference makers. A conscientious and punctual manner go a long way towards encouraging employers to invest in and retain their hires.”

Is there anything you would like to see DBVI do with self-advocacy services?

Most Common Responses:

- Develop skills for finding student’s interests and jobs that are relatable
- Create a system that supports students with multiple impairments to have meaningful work experience
- This is a challenge for most students
- Connect with outside resources such as Green Mountain Self-Advocates

Key Needs:

- Yes, the need to review, understand and demonstrate the 12 self-advocacy skills for adults found at this link [https://theabilitytoolbox.com/self-advocacy- skills-disability-chronic-illness/](https://theabilitytoolbox.com/self-advocacy-skills-disability-chronic-illness/)

What services have been successful for your students? Why?

Most Common Responses:

- Technology at home
- Group living and employment model
- LEAP
- Job exploration that provides an opportunity to explore various types of employment
- Work-based learning experiences with ReSOURCE and Overlook Café.

Key Needs:

- “Arranged job shadowing and work experiences make a positive impact on transition-aged clients. Active facilitation in connecting VABVI/DBVI clients with prospective employers or providers of post-secondary education can help bridge challenges like a digital divide, an absence of structured family supports and having access to a counselor outside of the educational system and specifically versed in visual impairments and disabilities in general are valuable supports. Having access to funding streams and programs orientated towards individuals who are blind or visually impaired are vital for leveling the employment and training landscape.”

Where are there gaps in services?

Most Common Responses:

- More exposure to workplace visits
- Big gap in services for students with complex needs

- Transportation throughout the state of Vermont
- Student's schedule does not allow for more time to explore jobs
- Low expectations from school and family
- Not mandating the parents to have DBVI involved in their child's life
- Students are not prepared for after they graduate high school.

Key Needs:

- "More emphasis on access to affordable and reliable personal transportation seems to be a widespread challenge at times in spite of one's socio-economic status. Additional recreational & leisure opportunities are always welcome. Having standing "check-ins" with one's DBVI counselor might afford better assessment of how the milestones of transition-aged student's journey are being met as they progress from their early teenage years to adulthood in post-secondary life."

**Pre- Employment Transition- Survey Results from Students- December, 2023**

Youth Ages: 14-24

What are you most successful at school (high school or college) for you? Select up to 3

- 61% selected- Navigating the building and/or campus
- 61% selected- Academics (communicating w/ teachers, learning about new ideas, completing assignments and projects, attending class, etc.)
- 56% selected- Socializing with peers
- 44% selected- Advocating for use of accommodations
- 33% selected- Using assistive technology

What is the most difficult part of school (high school or college) for you? Select up to 3.

- 22% selected- Navigating the building and/or campus
- 11% selected- Academics (communicating w/ teachers, learning about new ideas, completing assignments and projects, attending class, etc.)
- 33% selected- Socializing with peers
- 33% selected- Advocating for use of accommodations
- 33% selected- Using assistive technology

Why is the above selection the most difficult part of school for you?

- Struggles to understand content
- I don't use a lot of assistive technology - I haven't found a lot of need for it. Typically when I'm in science class (chemistry) and doing labs I sometimes need to identify colors which is challenging as I'm color blind. I sometimes use a digital magnifier

- I would say in order to receive your accommodation you need to advocate for yourself. If not you will not get what you need.
- I don't really start conversations with my peers on my own. I usually wait for someone else to start the conversation or ask me something.
- It was the most difficult for me because my aid left me behind half of the time and u would have to make my way there my self through the crowd
- Working on school work and work itself makes me focused enough to get my work done and not really socialize.
- My school building has over 2500 students and everywhere is congested during passing times so it can be kind of hazardous for me to get around with all those people. As for social things I'm not the best at socializing because I usually have trouble thinking of what to say to people, especially when I can't see them or find them in my crowded school.
- I have trouble talking with people.
- I have social anxiety and generalized anxiety, so doing stuff like that just causes a lot of it for me.
- Depends on the amount of work received, time management with completing assignments
- I'm not exactly sure why this is, but I am generally lacking in navigation skills, especially in unfamiliar or not-very-familiar places.
- The other stuff listed above include my strengths because they are more impactful to doing well in school but it is harder to practice skills consistently that you won't be using right away all of the time. It is hard to prioritize between different things to work on, and then I may regress in one area if I take a break from one thing to work on another.
- Because sometimes it is hard to ask for help
- I don't have the confidence to do advocate for accommodations completely on my own and learning new ideas is difficult because I do not understand the new content until we get further into it.
- I sometimes don't have anyone to teach me how to use these technologies.
- None of these things are of a difficulty to me at school.
- Rely on teacher to advocate for him
- I would say these things are difficult for me because if I was in a college setting I would probably get lost and get very lost especially in a bigger setting. I would ask for help but, I have hard time advocating for myself. I would try and use my cane if needed or have a friend help me to classes and anywhere I need to go. When I was in high school it was a small school so I knew how to get around pretty good. I am very shy so I have a hard time interacting with other peers. They would probably have to start the conversation.

How would you rate your social confidence? (5 being very confident, 1 being not confident at all)

- 0% selected- Not confident at all -- you do not seek out meeting new people, you do not express interest in others, you have difficulty speaking clearly and at an appropriate volume and pace, you do not seek out social situations: 0%
- 11% selected- 2
- 50% selected- 3
- 28% selected- 4
- 11% selected- 5 Very confident -- you seek out meeting new people, you express interest in others, you speak clearly and at an appropriate volume and pace, you seek out social situations.

Please select as many post-secondary education options as you are interested in.

- 67% selected- College (associates degree, undergraduate degree)
- 5% selected- Technical school
- 11% selected- Apprenticeships
- 17% selected- Graduate school (after undergrad)
- 28% selected- None of the above

If you are interested in attending college, what kind of experience would you be most interested in having?

- 11% selected- Commuting to campus
- 66% selected- Living on campus
- 17% selected- Attending online classes
- 17% selected- N/A -- Not interested in college

What would help you achieve the above college experience? Please select as many as apply.

- 56% selected- Mobility
- 28% selected- Assistive Technology Instruction
- 61% selected- Independent Living Skills Instruction (time management, etc.)
- 50% selected- College Readiness Workshops (connecting with accommodations office, disclosing your disability, etc.)
- 28% selected- N/A -- Not interested in College

What is the most important thing to you at this moment of your life? Select up to 3.

- 44% selected- Health: Being active, cooking healthy meals, trying new activities

- 61% selected- Social Life: spending time with family and friends, participating in extracurricular activities, meeting new people
- 50% selected- Employment: Making money, gaining work experience, building a resume, job exploration, etc.
- 78% selected- School: Getting good grades, attending classes, searching and applying for post-secondary education options
- 50% selected- Independence: Making decisions, traveling independently, time management

Why is the above the most important thing to you at this moment in life?

- Getting through high school and graduating is most important
- I want to go to college where there is good public transportation, so independence is a priority for me. School is important to me because I like learning and I want to go to college. I go to a school where the teachers are very chill so I like school.
- All of them are very important for me. Having a disability has its ups and downs but I will challenge myself to be independent and successful in life.
- I want to increase my level of health, socialization and independence so I can grow and be proud of my accomplishments.
- I would like to make some friends and earn some money
- These choices are important to me because I would like to have control over what I do to have a better future.
- Right now I'm doing very well in school and making money from some jobs which gives me a lot more independence to do things for myself.
- School because I want good grades and graduation.
- I am almost a legal adult, so I would like to get a job to support myself. I need to do well in school to get that job. I also want to be fairly independent, not always relying on others.
- Has been able to overcome challenges and attends college. Has great people to support her, and loves her family and friends.
- School is my #1 priority right now. It's perhaps the most important thing I can do well right now to ensure a positive future for myself. Staying in good health is extremely important in that respect too. Also, I'm getting close to becoming an adult and so I need to start figuring out how to do things on my own, so independence is key as well.
- They are all important, but getting good grades while remaining well rounded will show colleges that I should be accepted for my high school achievements. Having these hard skills outlined will show that I must have good soft skills as well to obtain the opportunities I have.



- They are life goals and like to try new things
- I want to make sure that I am getting good grades in order to graduate and that I am staying active. I met new friends at the Carroll Center for the Blind this past summer and at the recent BESB weekend retreat. I spend lots of time with my family on the weekends. I am a part of the Interact club at Bristol Central and I also manage the girls basketball and volleyball team there.
- I want to have a good balance in life and be able to excel in multiple areas of life.
- Because I believe that the main priority is to graduate high school to open new job opportunities.
- Enjoys sports and wants to finish up high school and move on
- I chose these things because at the beginning of this year I was told I have type two diabetes.. So I want to try and do more for myself and feel and be more healthy. I want to be able to control it one day and not take any more shots and not worry about it. I also want to spend as much time with my family and friends, do new things together, go on new adventures together. I also want to be more independent and travel new places as I go on with my life.

What do you enjoy most about your life at this moment? Be specific.

- English class, reading an interesting book in class.
- Currently, my school life is going really well. I'm about to go to London to travel, and I have good grades right now.
- Being and spending time with my family. Study so I can have a future career. I am focus on my studies because it is important for me and my future family. Travel the world is something I would love for my future. Discovering new places, culture and tradition is something I would love to experience.
- I enjoy the fact that I have people that care about me and want what's best for me.
- I love my family and love being with them
- I enjoy the liberty I have and the different choices I could make.
- Right now I most enjoy having more free time to do things that are important to me. Last year I did a lot of things during the week outside of school and was always busy but this year has been more calm and I have been able to do other things with my time.
- My family because i love spending time with my family
- My GF. She is the most wonderful person I have ever met.
- Being able to navigate and live in the city. Experiencing independence.
- I very much enjoy taking taekwondo classes, and I also love working at the local library in my town and planning for the future.

- I enjoy how my life is well rounded and I'm in control of it more. I enjoy taking classes that I am enjoying more this year and applying to colleges which is a fun but crazy journey. On the weekends, I enjoy spending time with my friends and family while taking advantage of work or other social opportunities.
- Working for LEAP
- I enjoy hanging out with my friends at school during lunch and hanging out with my family.
- I enjoy being able to make meaningful connections with people through work, school and life.
- I enjoy socializing with new people and making new friends.
- Sports- playing and watching sports
- I enjoy having my own apartment and making it my own space. I enjoy getting to work with my TVI and O&M people. I enjoy working with my best friend and doing services done with her, being able to have someone take me places I need to go. I enjoy spending time with my family, friends, doggies, and my cat. I love going new adventures. These are some of the things I enjoy in my life tiht now.

Share about the best work experience you have ever had. Why was it the best?

- Getting to meet new people at ReSOURCE through LEAP
- The Overlook Cafe because it was an accessible workplace. Not every cafe I might work at will have those sets of accommodations for a blind person.
- Working as a camp counselor with kids that are age 6 and 7. This was my first ever job and I loved it. Taking the leadership role is extremely important to lead the little ones and teach them.
- I think the best work experience I had was LEAP and how it helped me connect me with other visually impaired students.
- I loved working for leap it was fun earning money and making a new friend
- The best work experience I've had, other than volunteering at church, is working with my peers at LEAP. Virtually, the work environment feels unique. It's can be a low energy day and still you'll feel good about learning, working, and socializing with others.
- The best work experience I have had was when I tutored a younger girl in Algebra because I helped her get better grades and made a very high hourly rate for my work.
- In person work because i like meeting new people.
- Working at resource, in the tech area. I really enjoy tinkering and testing it.
- Working at the Overlook Cafe because she enjoys cooking and is able to develop her communication and cooking skills.

- I would have to say working at the library. The work is interesting without being stressful, and the rest of the library staff is really supportive and quick to answer any questions.
- It has to be the LEAP program this summer. This was great to explore three workplaces in one including the cafe, thrift store and gardens while just being supported enough but not too much. Also, we got a sense of what it was like to live in college with dorms and doing leisure activities on the weekends.
- I really like all the work experiences because I learn new things
- I worked at the Bristol Boys and Girls Club at Cambridge park as a Youth Development Professional through the United Way Walsh Summer Work Experience Program. It was the best because I got to meet the kids, do story time and games with them, and join their activities!
- I really like the marketing summer program. It was the best because it helped me to be able to gain skills about marketing while also getting to use my creative side. The pace of the program was also great.
- Pro rally going on a trip across the country in an Rv with my family because it really gave me a time to spend with family.

Share about the best LEAP/DBVI Program you have participated in. Why was it the best?

- Spring retreat 2023, liked the escape room, fun to do something new and exciting
- I liked working at the Overlook because I enjoyed cooking. Learning how to make a burrito has come in really handy during E-Week at my school, where we go away for a week and do something totally different.
- I have not attended any because I live in Connecticut.
- I think I've liked all of what LEAP had to offer for me.
- It was the best because I made a new friend
- The best LEAP program I've attended would have to be their Content Creation session. I've learned about slogans, calls to action, and different marketing tactics also.
- My favorite LEAP program was the fall program because it was more in my skill set than the summer program and I liked making money by learning even while school was going on.
- The Fall retreat because it was nice seeing people i know.
- My 3-week work experience when I stayed at the college. It was fun living with people like me.
- Winter ski retreat because she "gets to show off her sweet snowboarding skills". helps her practice for the special Olympics.

- The AT program! Partly because it's the only one I've been in, but mostly because I learned so much and was blessed with awesome coworkers and very supportive supervisors.
- I partially answered this in the above question but I will elaborate. There is nothing like being in person for 3 weeks this summer which was just long enough to be meaningful but not take too much of my summer up by preventing me from other exploration. I also enjoyed starting a network for myself of students who have similar lived experiences that I do. I enjoyed the virtual program this fall but we were not able to do as much as the summer in the same amount of time due to uncontrollable time restrictions in addition to the fact that we were on Zoom for most programming.
- In all of them, I always learn something new
- The LEAP Work-Based Learning experience was the best. I got to learn about assistive technology and how to create a campaign!
- The regular work program was great. I think it was the best because it helped me build leadership skills while also helping me to collaborate with people more efficiently.
- All of them were the best because they taught me new things.
- LEAP robotics retreat
- I would say the best LEAP program was when I attended in the summertime. It was great getting to meet new people, do fun things like go saili, biking, going to a baseball game, going to the beach, working at a work site, and living independent, things like that.

What is the most difficult for you to accomplish at this moment in your life? Select up to 3.

- 33% selected- Health: Being active, cooking healthy meals, trying new activities
- 22% selected- Social Life: spending time with family and friends, participating in extracurricular activities, meeting new people
- 50% selected- Employment: Making money, gaining work experience, building a resume, job exploration, etc.
- 11% selected- School: Getting good grades, attending classes, searching, and applying for post-secondary education options
- 33% selected- Independence: Making decisions, traveling independently, time management

Why is the above the most difficult for you to accomplish at this moment in your life?

- Not great at working out
- Employment because my school and homework schedule doesn't really allow for me to have a job after school and on weekends - I don't have time.
- With being a full time student at college it affects my work lifestyle. Due to me not having a license or a car.

- I don't currently have a job. But I hope to work sometime in the future. I also hope to have the skills I need to be as independent as possible
- Independence. I like to be able to get out and go places by my self.
- It's not overly difficult but definitely needs slight tuning so I could be more productive.
- I am not the best socially as I said above. I am trying to improve my health by exercising but I do have rather poor eating habits sometimes.
- I'm not good with independence.
- Anxiety, as I said above, and struggling with motivation.
- She is currently doing a work experience, but wants to explore possible careers for the future.
- I have little to no experience navigating and living independently. Making decisions for myself is rather difficult for me as well.
- It's a domino effect. By not having transportation, this makes my parents and others who are sighted more part of the process than I want them to be because this enables unwanted involvement not only getting to the locations but then the experiences that are more stationary.
- Sometimes it is hard to get motivated
- I have not been successfully able to search for a job on my own yet. I am not completely independent with traveling. I sometimes take longer than I should to get ready for the day.
- School takes up a lot of time so sometimes those things go on the back burner.
- There is nothing I can't accomplish in life.
- Finishing work on time, time management, trying to navigate Jaws
- I would say the reason some of these are difficult for me is because it's hard being a type two diabetic, it's hard to lose weight and make sure your eating and controlling your sugar levels. It's also hard finding a job where I live in such a small community. It's also hard not knowing what I want to do for a job and a future career.

What are you most excited about for your future? Please select as many as apply.

- 50% selected- Going to college
- 0% selected- Going to trade/technical school
- 61% selected- Having a job
- 44% selected- Living on your own or with roommates
- 44% selected- Traveling
- 11% selected- Getting a guide dog

Which programs would you be most excited to participate in? Choose up to 4

- 67% selected- In-person work experience
- 78% selected- Virtual work experience
- 67% selected- Career/interest assessments
- 61% selected- Job Readiness training workshops (Skill Shops)
- 28% selected- Orientation & Mobility Instruction
- 50% selected- Assistive Technology Instruction

Gaps and Needs—Students

- The student survey shows the continues need for the LEAP program. The goals of LEAP help students with all of the areas identified in their self-assessment. They have identified a need to build confidence in order to prepare and compete for future employment. They identified the need for pre-employment skills training and work experiences. They express a desire to live independently and to have employment, recreation, and a social life. There are many quotes from students that share how LEAP has helped prepare them for all of these goals.

### **Consumer-Driven Event (Great Expectations—April 2023)**

DBVI hosted a statewide Technology Fair and educational sessions in Montpelier on April 14, 2023. Participants attended from all areas of the state and included people who are blind or low vision of all ages. The theme was “Reconnecting to the World of Work and Each Other.”

The day began with a keynote address from an ultra-marathon runner from Boston named, Kyle Robidoux. He is currently employed in the Boston Mayor’s office as the Assistant Director of Housing Stability. He has successfully completed five 100 mile ultra-marathons and nine Boston Marathons. His talk was very inspiring and included details about how he uses sighted guides as he competes as a runner who is blind. He also explained how goal setting and perseverance are skills he uses for marathon running and in his role as an employee for the city of Boston.

The keynote was followed by two educational sessions and time for hands-on demonstrations of assistive technology at the Tech Fair exhibit. The first educational session included a discussion from panelists who are blind talking about their employment experiences and sharing information about how they adapt to blindness in the workplace. The second session included roundtable discussions about “Connecting with the Ever-evolving Virtual World.” This issue is critical for people who are blind and has created some great opportunities for virtually connecting with family and co-workers and minimizing the need for extensive travel. The discussion also included the importance of connecting in-person to limit isolation which is a concern for many blind Vermonters.

The Tech Fair was open between the sessions and included many of the leading assistive technology providers in the New England area. Participants had the opportunity to experience product demos and hands-on tryout of the technology. The OrCam is exciting new assistive technology that got a lot of attention. The product uses Artificial Intelligence to read documents and identify objects to assist people who are blind.

The blind high school students stayed the rest of the weekend in the Montpelier area to learn job readiness skills. They also took a tour of the statehouse and visited local businesses. These students are part of DBVI's Learn, Earn, and Prosper (LEAP) program which is a Pre-employment Transition program.

### **Rural Youth Apprenticeship Development (RYAD)**

Currently there are a low number of participants who are blind or visually impaired enrolled in apprenticeship programs at a national level. There are many reasons and DBVI is committed to finding opportunities and a pathway forward.

On September 28-29, DBVI staff participated in a Learning Collaborative to promote apprenticeship opportunities for youth who are blind or visually impaired. The Rural Youth Apprenticeship Development Project (RYAD) hosted its first in-person partnership meeting. The project promotes the development and advancement of apprenticeship programs for youth with disabilities in underserved rural communities. The five participating state disability agencies and partners shared updates and implementation strategies. They also shared ideas about how to identify and engage key partners and support employers and youth through the apprenticeship process. The DBVI Team meets monthly with RYAD staff from UMass Boston for technical assistance and guidance for implementing our strategic plan for youth apprenticeship opportunities. Each month a list of action items is developed to move the initiatives forward. Apprenticeship opportunities has been identified by DBVI staff and the SRC as a need and priority.

### **Recent Journal of Visual Impairment and Blindness Literature Review 2021 to 2023 indicates the following employment, transition, post-secondary education and transportation needs of individuals who are blind and visually impaired:**

#### **Employment**

Crudden, A., & McKnight, Z. S. (2022). Skills Associated With Job Retention Among Persons With Visual Impairments. *Journal of Visual Impairment & Blindness*, 116(5), 668-677.  
<https://doi.org/10.1177/0145482X221131822>

- Crudden & McKnight (2022) explore the association between job-related skills and the employment status of individuals with visual impairments who have a competitive employment history, focusing on data from a national survey. Findings indicate that individuals with professional licensure or certificates are more than twice as likely to be employed compared to those without these qualifications. Employed participants were also less likely to require job-related training. The study suggests the importance of encouraging individuals with visual impairments to pursue job skills training and professional licensure or certification aligned with their career goals. The implications for practitioners include the recognition that even those with work experience may benefit from additional job skills training, and support may be needed for individuals with visual impairments to obtain professional credentials. Careful career planning is emphasized for positive employment outcomes, involving research into the credentials associated with specific employment goals.

McDonnall, M. C., Cmar, J. L., & McKnight, Z. S. (2022). Beyond Employment Rates: Self-Employment and Other Categories of Work Among People With Visual Impairments. *Journal of*

Visual Impairment & Blindness, 116(5), 729-735.

<https://doi.org/10.1177/0145482X221128831>

- This study utilized data from the American Community Survey (ACS) to examine the class of worker among employed individuals with visual impairments, with a particular focus on the self-employed category. The U.S. government classifies workers into nine categories based on the type of ownership of the employing organization, encompassing private for-profit, private not-for-profit, government, and self-employed individuals. The study revealed that people with visual impairments were more likely to be self-employed than those without visual impairments, with approximately 9.7% of individuals with visual impairments falling into the self-employed category. Self-employed individuals with visual impairments differed in characteristics such as gender, race, education, and receipt of Social Security Disability Insurance (SSDI) compared to those in other class of worker categories. The study also examined earnings, finding that self-employed men with visual impairments had higher mean earnings than men in other employment categories, but both self-employed men and women had lower median earnings than their counterparts in other classes of worker. The findings suggest the importance of further research to explore the experiences, challenges, and opportunities for self-employed individuals with visual impairments.

McDonnall, M. C., Cmar, J. L., & McKnight, Z. S. (2022). Beyond Employment Rates: Earnings of People With Visual Impairments. *Journal of Visual Impairment & Blindness*, 116(4), 526-532. <https://doi.org/10.1177/0145482X221121830>

- This study investigates the earnings of employed individuals with visual impairments, comparing them by gender, visual impairment, and education. Using data from the 2019 American Community Survey, the study finds that women with visual impairments earn 77.9% of what men with visual impairments earn in terms of annual earnings, with an 85.6% hourly gender pay gap. Both men and women with visual impairments have lower earnings than their counterparts without visual impairments, with the gap being larger for men. Higher education is associated with higher earnings for all groups, and women with visual impairments benefit more from educational advancement than women without visual impairments. The study suggests that, although education improves employment likelihood and earnings, it doesn't entirely close the earnings gap between people with and without visual impairments. Limitations include self-reported earnings data and a lack of information on the type or level of visual impairment. Further research on occupational fields and additional factors is recommended.

Steverson, A., & Crudden, A. (2023). Predictors of Job Satisfaction for People With Visual Impairments. *Journal of Visual Impairment & Blindness*, 117(2), 148-161. <https://doi.org/10.1177/0145482X231168889>

- Steverson & Crudden examine the job satisfaction of individuals with visual impairments, a topic underexplored in existing research. Using standardized measures, the study analyzes data from 195 employed participants, focusing on relationships with colleagues and supervisors, advancement opportunities, and employee demographics as predictors of job satisfaction. Findings reveal that high job satisfaction is associated with positive perceptions of treatment by colleagues, supervisor support, and certain demographic factors. Underemployment is linked to lower job satisfaction, emphasizing the importance of achieving vocational potential. The study suggests promoting social interactions at work, training colleagues and supervisors on working



with individuals with visual impairments, and ensuring vocational programs align with participants' interests and abilities to enhance job satisfaction.

Makkawy, A., & Long, S. (2021). Visual Impairment in the Virtual Workplace: Exploration, Experience, and Interpretation. *Journal of Visual Impairment & Blindness*, 115(4), 299-309. <https://doi.org/10.1177/0145482X211028396>

- This study employs interpretive phenomenology to explore the experiences of individuals with visual impairments in the virtual workplace, addressing the growing relevance of virtual work in employment. Through an online questionnaire and Applied Thematic Data Analysis, three primary themes emerged: being visually impaired can define a person in the workplace, technology can make things unequal, and being creative is important for success. Theoretical and applied implications emphasize the social aspects surrounding workplace navigation, including communication about access, advocacy for accessibility, and the role of assistive technology within cultural and societal employment norms. Accessibility is viewed as both a technical and social challenge, crucial for current and future workplaces heavily reliant on technology.

McDonnall, M. C., & Antonelli, K. (2022). Changing Employers' Implicit Attitudes About the Competence of People Who Are Blind. *Journal of Visual Impairment & Blindness*, 116(3), 361-372. <https://doi.org/10.1177/0145482X221105512>

- This experimental study investigated the impact of a one-hour meeting between vocational rehabilitation (VR) professionals and hiring managers on implicit attitudes towards the competence of blind individuals in the workforce. The study involved 57 hiring managers from a financial services company in the southern United States and utilized a 4 (group) × 3 (time) experimental design. Results showed a significant decrease in Implicit Association Test-Blind & Visually Impaired (IAT-BVI) scores following the meeting, indicating that brief interactions with VR professionals can mitigate employers' implicit bias about the competence of blind individuals. While the vision status of the VR professional did not significantly influence this change, further analysis revealed a notable decrease in IAT-BVI scores among hiring managers who interacted with the blind VR professional, emphasizing the potential impact of exposure to competent blind individuals on implicit attitudes. The study suggests that extensive communication by VR professionals about the capabilities of blind individuals can enhance employers' implicit attitudes.

McDonnall, M. C., & Tatch, A. (2021). Educational Attainment and Employment for Individuals with Visual Impairments. *Journal of Visual Impairment & Blindness*, 115(2), 152-159. <https://doi.org/10.1177/0145482X211000963>

- McDonnall & Tatch (2021) investigate the relationship between educational attainment and employment rates for individuals with visual impairments using national labor market data from the American Community Survey over a 10-year period (2008-2017). While higher education is generally associated with better employment outcomes, the study reveals substantial disparities in employment rates based on educational levels for individuals with visual impairments compared to those without disabilities. The employment gap narrows as educational attainment increases, emphasizing the importance of higher education for individuals with visual impairments. The study also highlights a significant disparity in college degree attainment between individuals with visual impairments and those without disabilities,

urging professionals and vocational rehabilitation agencies to encourage postsecondary education for better employment opportunities among the visually impaired. Despite a positive association between education and employment, a persistent employment gap exists for college-educated individuals with visual impairments compared to their counterparts without disabilities, suggesting the need for further research into the reasons behind this disparity.

## **Transition**

Cmar, J. L., & Steverson, A. (2021). Job-Search Activities, Job-Seeking Barriers, and Work Experiences of Transition-Age Youths With Visual Impairments. *Journal of Visual Impairment & Blindness*, 115(6), 479-492. <https://doi.org/10.1177/0145482X211059182>

- Cmar & Steverson aimed to depict the job-seeking and work experiences of transition-age youths with visual impairments by analyzing follow-up data from a quasi-experimental job-search intervention conducted from 2016 to 2019. The 88 participants, divided into intervention and comparison groups, reported engaging in various job-search activities such as resume preparation and job applications, but these were performed infrequently. Many faced barriers during their job search, and few found paid employment. Participants had moderate levels of preparation for overcoming job-seeking barriers and received parental support. Both intervention and comparison groups showed similar results on most measures, emphasizing the challenges faced by youths actively seeking employment. The study suggests that feedback on job-seeking approaches, application materials, and interview skills, along with ongoing support, could benefit youths with visual impairments in their job search. Explicit discussions about different types of work activities may help them understand the distinctions between short-term work experiences and paid jobs.

Tuttle, M., & Carter, E. W. (2022). Examining High-Tech Assistive Technology Use of Students With Visual Impairments. *Journal of Visual Impairment & Blindness*, 116(4), 473-484. <https://doi.org/10.1177/0145482X221120265>

- This study investigates the use of "high-tech" assistive technology (AT) by students with visual impairments, aiming to understand how it is employed in their educational experiences. The survey, involving 51 students, explores personal and device characteristics, device usage, AT assessment, and instruction. Results reveal that students predominantly use commercially available AT to access printed materials, with some variations observed between elementary and secondary students. The alignment between device instruction and usage is highlighted. The discussion emphasizes the versatility of high-tech AT in meeting diverse needs, underscoring the importance of individualized AT selection and services. The implications for practitioners suggest educators should consider AT for various student needs, encourage device use at home, reflect on their instruction methods, and pursue professional development in this area.

Cmar, J. L., & Steverson, A. (2021). Job-Search Activities, Job-Seeking Barriers, and Work Experiences of Transition-Age Youths With Visual Impairments. *Journal of Visual Impairment & Blindness*, 115(6), 479-492. <https://doi.org/10.1177/0145482X211059182>

- This study investigates the job-seeking and work experiences of youths with visual impairments, using follow-up data from a longitudinal research project. The findings emphasize the importance of early work experiences in predicting future employment for individuals with visual impairments. Notably, school-sponsored work was not found to be related to future

employment outcomes, while finding jobs independently predicted better results. Job-seeking is described as an intentional and dynamic process, and various barriers for individuals with visual impairments are identified, including discrimination, transportation issues, and inaccessibility. Job-search facilitators include goal setting, personal networks, constructive feedback, and job-search training. The study explores participants' job-search activities, barriers, outcomes, volunteer and work experiences, and parental support. The study underscores the need for tailored interventions addressing the unique challenges faced by youths with visual impairments in their pursuit of employment.

Barnhill, B. (2021). Raising Expectations and Improving Transition Outcomes for Students Who Are Deafblind. *Journal of Visual Impairment & Blindness*, 115(6), 585-589. <https://doi.org/10.1177/0145482X211061201>

- Barnhill (2021) explores the transition outcomes of individuals who are deafblind, drawing parallels to the experiences of Laura Bridgman, the first deafblind student at Perkins School for the Blind in the 19th century. Despite the advancements in special education since Bridgman's time, post-school outcomes for deafblind individuals remain challenging. The research identifies predictors of success, such as paid work experiences in high school, parental expectations, and vocational rehabilitation services. The study emphasizes the need for improved transition planning and heightened expectations for individuals who are deafblind. It introduces a three-part plan developed by the Utah Deaf-Blind Project to enhance post-school outcomes, focusing on increased collaboration among stakeholders, deeper understanding of the student's needs, and greater access to quality transition services. The article concludes by providing resources for professionals working with deafblind students to ensure meaningful transitions to adult life.

## **Transportation**

Zebchazy, K. T., Rosenblum, L. P., & Thompson, K. M. (2022). The Impact of COVID-19 on Transportation of Adults With Visual Impairments. *Journal of Visual Impairment & Blindness*, 116(6), 794-805. <https://doi.org/10.1177/0145482X221143143>

- The study, conducted with approval from the American Foundation for the Blind Institutional Review Board, aimed to explore the impact of the COVID-19 pandemic on transportation concerns among adults aged 18 and older in the United States who self-reported being blind or having low vision. The researchers disseminated an accessible online survey through collaborating organizations, receiving responses from 1,921 participants. The survey included Likert-scale concern statements and open-ended questions regarding transportation, health care, and other related aspects. The constant comparison method was employed to analyze responses, identifying 10 main themes and subthemes. These included concerns about support networks, financial considerations, medical needs, safety, social-emotional impact, personal transport changes, technology, inaccessible solutions, COVID impact on lifestyle, and systemic social issues. Respondents expressed worries about disruptions in transportation services, financial constraints, safety in public spaces, and the impact of the pandemic on their overall well-being. The study emphasized the need for inclusive transportation planning, accessibility in technology, and policy changes to address the specific challenges faced by individuals with visual impairments, both during crises like the pandemic and in normal circumstances. The limitations of the study included a lack of diversity in the sample and

potential biases in survey questions. The findings underscored the importance of considering the unique needs of the visually impaired in transportation and disaster planning efforts.

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, and to provide mentoring opportunities to youth and adult populations. Of concern to the Statewide Rehabilitation Council and constituency groups is the need improve access and create new pre-apprenticeship and apprenticeship opportunities for youth who are blind and visually impaired.

DBVI has strong partnerships with Developmental Services and Mental Health providers for individuals who need supported employment. Eligible consumers can access programs through Developmental Services agencies and Vermont JOBS programs through Mental Health. DBVI consumers who are not found eligible for these programs, can access natural supports as long term supports provided by employers with guidance from DBVI rehabilitation staff. DBVI strives to have all individuals participate in trial work experiences using supported employment when appropriate.

#### B. INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES AND INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

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:

- Interpretation and translation service available to all AHS staff.
- Tools for working with Limited English Proficient clients.
- Specialized training for communicating across cultures and communicating effectively through an interpreter.
- The Diversity, Equity and Inclusion group has been meeting across state government, and DBVI is an integrated partner within the work of this group.
- DBVI State Rehabilitation Council has formed a policy revision group and will update DBVI policies to better reflect the needs of diverse backgrounds in 2022.

DBVI staff are dedicated to ongoing professional development that includes training for cultural competency and non-bias service delivery in vocational rehabilitation programs. Specific needs of individuals include the opportunities for career pathways and services to support these goals. Opportunities for credential attainment and educational and vocational training are encouraged and supported.

DBVI staff are actively involved in the Diversity, Equity, and Inclusion workgroup for the agency. This group will continue to identify best practices for the agency service delivery. DBVI staff have also joined a recently formed committee called Justice, Equity, Diversity, and Inclusion (JEDI). This department wide committee will form strategies for diverse populations.

The CSNA data shows 3 categories of individuals who are unserved or underserved.

### **Aging population**

Vermont is the 2<sup>nd</sup> oldest average age population in the country. Vermont DBVI is located within the Department of Disabilities, Aging and Independent Living (DAAIL). The mission of the department is to make Vermont the best state in which to grow old or live with a disability – with dignity, respect and independence. 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 to help these individuals stay in the workforce as they learn new skills to adapt to their vision loss.

### **Deaf-blind population**

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 lessen 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.

DBVI did receive a 2-year grant from the Administration for Community Living to start an SSP program. FFY 24 will be the second year of the project and DBVI will be seeking future funding. There is strong support and a high level of satisfaction from people who are accessing the service.

### **Rural youth apprenticeship**

Vermont is a rural state and youth who are blind and visually impaired are underserved in the areas of pre-apprenticeship and apprenticeship statewide. DBVI encourages youth throughout 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. There is a need to build strong partnerships with partners, to develop new apprenticeship models throughout the state and expand the successful LEAP model to reach rural areas of the state. One example of an underserved population is the Northeast Kingdom of the state. This area is very rural and has very few jobs.

### C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE 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.

- Goal 1: Ensure that people in Vermont have easy access to education, training, and services that support attainment of their career and financial goals.
- Goal 2: Ensure that everyone – including women, Veterans, minorities, people with disabilities, and other underrepresented groups - can contribute and thrive in high demand careers that will directly impact Vermont's success over the next decade - housing, broadband access, climate resiliency, transportation infrastructure, childcare, education, and healthcare.
- Goal 3: Increase assistance to Vermonters to encourage high school completion, earn additional qualifications like industry-recognized certificates, participate in registered apprenticeships, or pursue post-secondary degree program.
- Goal 4: Integrate continuous improvement practices into the operations of the workforce development system, its core partners and education and training providers, so the system can effectively serve as many individuals and businesses as possible.
- Goal 5: Meet the needs of Vermont's employers by proactively engaging education institutions, youth, young adults, and college students at key transition points, to increase their awareness of the many career entry and advancement opportunities around the state.
- Goal 6: Ensure employers have the tools they need to navigate labor shortages by linking them to on-the-job training programs, technical assistance, information on best practices in job design, hiring, compensation, and emerging expectations that workers have of their workplace.
- Goal 7: Adapt the public workforce system's access points to ensure hyper local and virtual components are available to meet the needs of jobseekers of every generation and background.
- Goal 8: Align data collections across the workforce system so that data can be more effectively and efficiently used to inform decisions, to identify gaps in service delivery, to uncover gaps in training and credentialing, and to foster equity and accessibility within the public workforce system and among the core partner programs.

The needs of individuals served by other components of the workforce system include small numbers in a small state. Most individuals who are blind receive their primary vocationally related services from DBVI. Recent partnerships and opportunities are increasing and DBVI is providing expertise about blindness to help these programs become more accessible. The intent of WIO is working and these program partnerships are making it possible for blind participants to access these opportunities.

### D. YOUTH WITH DISABILITIES, INCLUDING STUDENTS WITH DISABILITIES AND THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES. INCLUDE AN ASSESSMENT OF THE NEEDS OF

INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER IDEA.

The 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. Sixteen 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

#### DBV 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 2023--As of September 30, 2023:

- \$267,000 (15% reserve requirement + carry over/re-allotment)
- \$57,700 was spent on staff time and associated expenses
- \$90,000 for Coordination In contracts (LEAP contract)
- \$120,000 was spent on the 5 required Pre-ETS Transition Service Areas.
- \$4,444 Average Cost Per Student for the 5 required Pre-ETS Services (based on 27 students).

Calculation: Agency 15% Reserve Requirement= \$267,000; Number of students served=27; Total Pre-ETS Required Activities= \$120,000 divided by 27 students equals an Average Cost Per Student= \$4,444; Total Pre-ETS Coordination Activities= \$147,000; Total Pre-ETS Expenditures= \$267,000; Amount Available for Authorized Activities= \$0

#### Projections for FFY 2024 and 2025:

- \$267,000 (15% reserve requirement + carry over/re-allotment)
- \$57,700 was spent on staff time and associated expenses
- \$90,000 for Coordination In contracts (LEAP contract)
- \$120,000 was spent on the 5 required Pre-ETS Transition Service Areas.
- \$4,000 Average Cost Per Student for the 5 required Pre-ETS Services (based on 30 students).

Calculation: Agency 15% Reserve Requirement= \$267,000; Number of students served=27; Total Pre-ETS Required Activities= \$120,000 divided by 30 students equals an Average Cost Per



Student= \$4,000; Total Pre-ETS Coordination Activities= \$147,000; Total Pre-ETS Expenditures= \$267,000; Amount Available for Authorized Activities= \$0

A statewide estimate of students exiting/graduating high school at the end of SY 2024 is 18 students. This number fluctuates significantly from year to year in our small state. In SY 2023 only 5 students graduated. Currently there are 13 students in 9<sup>th</sup> grade, 8 students in 10<sup>th</sup> grade, and 11 students in 11<sup>th</sup> grade.

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 Assistant 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.

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.

In 2021, Vermont DBVI was selected as a partner with the Institute for Community Inclusion UMASS Boston, Rural Youth Apprenticeship Development Grant. DBVI's overall goal is to address the challenge of access to apprenticeships for Vermont youth who are blind and

visually impaired through key partnerships with the Agency of Education, Division of Vocational Rehabilitation, Department of Labor and other partners.

- DBVI goals: Expand opportunities for students to have work-based learning in their home communities as part of an expanded menu of LEAP options.
- Expand Virtual opportunities for students to learn and connect.
- Expand school year retreats to build skills for work readiness training.
- Expand the Learn, Earn and Prosper (LEAP) pre-apprenticeship model as an opportunity for youth to gain skills in employment, independent living and pre-apprenticeship.

The specific needs for students outlined in the CSNA include more opportunities for apprenticeship, career mentoring, proficiency with assistive technology, building industry credentials, and building the pre-ETS core skills.

Other important initiatives related to the assessment of student needs: From May 19- July 7, 2023 DBVI led the effort to convene the Pathways to Partnership Grant Initiative Planning Committee and application teams. DBVI submitted the successful Federal grant application to the Rehabilitation Services Administration by July 7, 2023. Critical needs identified by HireAbility and DBVI and lead partners include:

- *Lack of customized employment.* The Workforce Innovation and Opportunity Act (WIOA) places increased responsibility on to collaborate with schools in creating competitive integrated employment and customized employment opportunities. Under WIOA, students ages 14-24 must explore community employment through DBVI/DVR services.
- *Lack of self-advocacy skills and leadership goals for youth with disabilities in transition plans.* According to the OSERS's *Transition Guide (2020)* students with strong self-advocacy skills who understand and fully participate in the development of their IEP and Summary of Performance have better transition outcomes.
- *Lack of consistent school-based employment models.* Vermont schools fund school-based employment initiatives (funded by IDEA, general education work-based learning and proficiency-based graduation requirements) but lack consistent models to facilitate access and have been hit hard by the critical shortage area in special education personnel.
- *Workforce development needed for underserved, rural, diverse, and other hard to reach communities.* Rural communities are underserved needing more flexible and mobile offerings to establish strong connections with employers and innovative programming.
- *Connections with employers.* Only a few Vermont LEAs contract with community service providers to support competitive integrated employment. School-based youth employment specialists funded by HireAbility/DVR are available to only four out of 52 districts.
- *Financial Literacy.* Vermont's ability to develop the knowledge, skills, and values of financial literacy for youth with disabilities is inconsistent.

- *Peer mentorship.* While Vermont boasts both a vibrant Center for Independent Living and one of the leading statewide self-advocacy organizations in the country, limited peer mentor opportunities are available to youth with disabilities.
- *Interagency coordination.* Vermont's experience holds that successful transitions for youth with disabilities happen at an interagency level and with the support of partners. VT-P2P partners will improve the IDEA transition outcomes of indicators 13, 14 and the summary of performance for all students with disabilities.

## 2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

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.

Surveys with TVI's and State partners indicate that improved relationships with technical education centers and the development of apprenticeship models may further DBVI's ability to achieve the results our consumers expect.

### C. GOALS, PRIORITIES, AND STRATEGIES

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of Section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107 of the Rehabilitation Act. VR agencies must—

1. DESCRIBE HOW THE SRC AND THE VR AGENCY JOINTLY DEVELOPED AND AGREED TO THE GOALS AND PRIORITIES AND ANY REVISIONS; AND

Based on the DBVI/SRC Tri-Annual Comprehensive Needs Assessment completed in CY 2021, CY 2022, and CY 2023, DBVI and the SRC have established goals, strategies targets in response to the new mandates and requirements included in the Workforce Innovation and Opportunities Act (WIOA). DBVI and the SRC established goals and priorities related to the implementation of the WIOA Common Performance Measures. All DBVI goals and priorities are established within the Division's long-established strategic themes for all participants of the DBVI program that include:

- Economic Independence.
- Blindness Related Adaptive Skill Building (Assistive Technology; Low Vision; O+M; Blindness Rehabilitation Evaluation and Teaching).
- Delivering DBVI services well and assisting individuals to become better off.
- Expanding program growth and partnerships.

2. IDENTIFY MEASURABLE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS AND THE BASIS FOR SELECTING THE GOALS AND PRIORITIES (E.G., CSNA, PERFORMANCE ACCOUNTABILITY MEASURES, SRC RECOMMENDATIONS, MONITORING, OTHER INFORMATION). AS REQUIRED IN SECTION 101(A)(15)(D), (18), AND (23), DESCRIBE UNDER EACH GOAL OR PRIORITY, THE STRATEGIES OR METHODS USED TO ACHIEVE THE GOAL OR PRIORITY, INCLUDING AS APPLICABLE, DESCRIPTION OF STRATEGIES OR METHODS THAT—

A. SUPPORT INNOVATION AND EXPANSION ACTIVITIES;

B. OVERCOME BARRIERS TO ACCESSING VR AND SUPPORTED EMPLOYMENT SERVICES;

C. IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POST-SECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES); AND

D. IMPROVE THE PERFORMANCE OF THE VR AND SUPPORTED EMPLOYMENT PROGRAMS IN ASSISTING INDIVIDUALS WITH DISABILITIES TO ACHIEVE QUALITY EMPLOYMENT OUTCOMES.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

The goals and strategies established by DBVI and the SRC are as follows:

Goals:

1. DBVI will align services to support consumers in achieving the WIOA Common Performance Outcome Measures.

2. DBVI will increase the percentage of consumers earning more than minimum wage at closure.
3. DBVI will increase consumer opportunities to participate in post-secondary education and training and gain industry recognized credentials.
4. In partnership with VDOL and Community Partners, DBVI will create more opportunities for DBVI consumers to participate in DOL programs.
5. DBVI will improve the outcomes for students and youth.
6. DBVI will continue to expand efforts to effectively serve employers through HireAbility Workforce Partners (Creative Workforce Solutions).
7. DBVI will continue to seek opportunities to expand and/or improve services for underserved populations including individuals who need supported employment.
8. DBVI will continue to track consumer satisfaction with the program's services through the Tri-annual consumer satisfaction survey.

Strategy 1: DBVI will implement a series of initiatives to align staff practices, services and assignment of resources to meet the WIOA Common Performance Measures. Goals 1, 2, 3, and 4.

In order to maximize DBVI outcomes under the WIOA Common Performance Measures, DBVI will implement or continue to implement the following:

- DBVI will track the three leading indicators which are:
- Leading Measure One: The use of career assessment tools to support exploration of higher wage and higher skill options.
- Leading Measure Two: The involvement of master's level certified blindness instructors to strengthen consumer adaptive skills in completing their employment goal.
- Leading Measure Three: Assistive technology evaluation or training to assist consumer with their employment goal.
- All DBVI staff will be trained to do vocational assessments and use assessments as a career planning tool.
- 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.
- Business Account Managers (BAMs) will understand the career paths in the businesses they serve.
- DBVI will explore training opportunities at schools for the blind to learn how they are using vocational assessments (feedback provided by SRC).
- DBVI will explore the Job Accommodation Network as a tool for exploring assistive technology needs with participants (SRC).

- DBVI will develop relationship with Griffin-Hammis learn more about customized employment opportunities and career assessments (SRC).

Strategy 2: Coordinate efforts with the Vermont Department of Labor (VDOL) and the Agency of Education (AOE) to ensure that blind and visually impaired individuals have access to employment training and other components of the workforce system. Goals 2 and 4.

As noted in the Unified Section of the plan, DBVI will be working closely with DVR, VDOL and AOE to ensure DBVI consumers have access to all the workforce development opportunities available in their communities. DBVI will be implementing strategies to make this happen including the following:

- DBVI will meet regularly with VDOL to facilitate coordination of services.
- DBVI, DVR, AOE and VDOL will implement systems to track and manage co-enrollment in each other's programs.
- DBVI will explore virtual access to DOL programs.
- DBVI, with the support of DVR, AOE, and the RYAD learning collaborative will develop stronger partnerships with the local Technical Educational Centers, Adult Basic Education programs, AmeriCorps, and Community College of Vermont.
- DBVI will implement a plan for staying connected with all DOL partners of the AJC.
- 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 work with HireAbility Workforce Partners local teams, Business Account Managers, and DOL to obtain employment needs of companies and then match DBVI customers with specific training.
- DBVI will invite DOL and AOE to a staff meeting to discuss collaboration ideas.
- DBVI will explore training opportunities with DOL to learn about dual enrollment opportunities (SRC).
- DBVI will continue to explore apprenticeships opportunities with HireAbility and DOL. DBVI will connect with BAMs to determine businesses that would benefit from apprenticeship model (SRC)

Strategy 3: Expand employer outreach and engagement efforts through HireAbility Workforce Partners to effectively meet the needs of employers. Goals 1 and 6.

HireAbility Workforce Partners is the primary employer outreach and engagement infrastructure for DVR and DBVI. HireAbility Workforce Partners, and in particular the Business Account Managers, have been a very effective approach to engaging employers and developing employment opportunities for DBVI consumers. DBVI will expand these efforts through the following strategies:

- Seek opportunities to coordinate employer engagement with the Vermont Department of Labor.
- Build on and expand employer events such as job fairs, employer breakfasts and business recognition events designed to engage employers.
- DBVI will explore creative marketing strategies with BAMs and workforce partners to outreach to employers who may be struggling to hire (SRC).

Strategy 4: Explore strategies to assist DBVI consumers to retain or advance in employment. Goals 1, 2, 3 and 4.

- DBVI will develop and implement a systematic approach to follow up with consumers after job placement. The intent will be to re-engage the consumer at key points to determine:
  - If they need or want more support to retain their employment?
  - If they want assistance with career development and training in their current employment?
  - If they want to pursue further career development with a different employer or in a different field?
- The follow up will occur at key points after initial job placement. The first contact will be immediately after initial job placement through a congratulations letter and follow up call from the VR counselor.
- The second contact will occur at 60 days post placement. The final contact will occur at three months post-employment closure. The hope is that this systematic follow up will both help consumers retain employment and identify opportunities for career advancement.
- DBVI will identify training and certificates for participants to engage in that may lead to career advancement (SRC).

Strategy 5. Continue to explore strategies to develop and expand services for underserved populations including individuals who require supported employment through partnerships, grant and funding opportunities. Goals 2 and 7.

- DBVI will create an inclusive outreach plan that includes consumers and providers.
- Develop a set of outreach materials to be used at events across the state including outreach to minorities and underserved populations.
- Educate providers about the importance of timely referrals.
- Outreach to developmental disabilities services and mental health agencies that typically do not refer 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.
- Coordinate with DVR Transition Counselors, and the Teachers of the Visually Impaired to increase and expand services for transition students. Create some documents that explain what DBVI can offer.
- Create a statewide system to track all visually impaired students as they graduate high school.
- DBVI will continue to support efforts of Vancro's Support Service Provider Program which serves Deafblind Vermonters (SRC).
- DBVI will explore collaborative outreach efforts with the Vermont ABLE library to expand outreach to individuals throughout Vermont (SRC).

Strategy 6: Improve Outcomes for Students and Youth. Goal 5.

- 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 DVR 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 expand pre-employment transitional services offered in the Learn, Earn and Prosper (LEAP) Program to meet the needs of students and families and therefore increase enrollment participation.
- DBVI will support the efforts of ReSource's OSEP grant entitled "LEAP Connect" which will provide assistive technology, and college/career readiness training for transition students who are blind and visually impaired starting as early as sixth grade.
- DBVI will lead initiatives in the Vermont Pathways to Partnership grant which focuses on improving transition outcomes for students with disabilities.

Strategy 7: 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." Goals 1 and 6.

- Create products to bring and teach employers to understand the assistive equipment
- Create a network of ambassadors who demonstrate their assistive technology or white 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.
- 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.
- Offer Simulations to demonstrate “what is it like to be blind?”

Strategy 8. DBVI will create Consumer Driven Events to assist individuals as they prepare for employment. Goals 1 and 2.

- 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.
- DBVI will explore a calendar for DBVI participants which outlines events throughout the year (SRC).
- DBVI will research the possibility of creating virtual employment groups for DBVI consumers (SRC).

Strategy 9: DBVI will create opportunities for access to information.

Goals: 4 and 8.

- 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?”
- Find ways to improve the process for the accessibility of online job applications.

Strategy 10: DBVI will address transportation challenges. Goals: 7 and 8.

- DBVI will work with VTRANS to learn more about their “Go Vermont” website that helps people connect with all the available transportation options in their area.
- 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.
- 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 11: DBVI will improve communication with customers regarding expectations for DBVI services. Goals: 8.

- 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.
- DBVI will examine and develop language for successful closure that celebrates successful status for consumers in the VR and IL programs.
- DBVI will examine feasibility to pilot post closure status for the Independent Living program in collaboration with state partners such as VABVI.

Strategy 12: DBVI will provide technology training for people who need to prepare for a job or succeed at a current job. Goals: 1 and 2.

- DBVI will create a consumer listserv that will be used to share technology solutions for access and work and in the community.
- 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, and Adobe documents so they can do their job in the most efficient way.

Strategy 13: DBVI will implement strategies designed to enable DBVI customers to access higher wage employment through short-term training. Goals: 1, 2, 3, and 4.

- 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.
- DBVI will work to meet goals outlined in Rural Youth Apprenticeship Development grant and participate in RYAD learning collaborative.

#### A. Support Innovation and Expansion Activities:

Innovation and Expansion funds have been used to support initiatives in employment related initiatives in the State Plan for Independent Living (SPIL) submitted by the Statewide Independent Living Council (SILC). The DBVI Director actively participates in SILC activities and helps to coordinate employment related initiatives in the SPIL and DBVI Goals and Priorities.

One area of overlap is related to people who are deaf and blind. The SILC and DBVI have both identified this as an underserved group. Both entities are working together to develop strategies to meet these needs. Another area of mutual interest is transportation. This is essential for employment and requires collaboration and creativity in a rural state.

#### B. Overcome barriers to accessing VR and supported employment services:

DBVI has a long and successful history of collaboration with the larger General DVR 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 making 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 Developmental Service Agency to provide specialized job development services.

C. Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment, and pre-employment transition services);

DBVI uses several strategies to address the needs of transition aged youth. It begins with outreach to all students who are blind or visually impaired. Before school begins each year, DBVI Counselors meet with the Teachers of the Visually Impaired for all high schools in their region. They review the student list and determine 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. There are now many virtual pre-ETS experiences and hybrid opportunities due to the pandemic. See section D for more updates regarding DBVI transition services.

D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

DBVI will continue to use the Workforce Partners 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 of 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 leads to good jobs. DBVI consistently ranks above the national blind agency average for wages and number of hours worked. This result is directly connected to college and vocational training.

#### PY 2022 WIOA Performance Measures In Vermont (for DVR and DBVI)

- Measurable Skills Gains were 56.7% and the national average was 48.7%.

- Employment Rate Second Quarter after Exit was 56.8% and the national average was 37.6%.
- Median Earnings Second Quarter after Exit was \$6,153 and the national average was \$5,130.
- Employment Rate Fourth Quarter after Exit was 55.4% and the national average was 52.8%.
- Credential Attainment Rate was 53.2% and the national average was 37.6%.

The strategies to improve these measures include a commitment to a career pathway. DBVI reinforces with each consumer that our services can help them build a career. They can work with us to obtain industry credentials and advance in their current careers. They are also encouraged to seek post-secondary education or vocational training while working with DBVI. Some consumers start with progressive employment and try different jobs of interest through a work experience. This helps them learn about jobs they like or don't like and helps them make decisions about future education and training. Each of these strategies leads to job retention, higher wage jobs, new skills, and industry credentials.

#### D. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

##### 1. PROGRESS IN ACHIEVING THE GOALS AND PRIORITIES IDENTIFIED FOR THE VR AND SUPPORTED EMPLOYMENT PROGRAMS;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

Goal 1. DBVI will align services to support consumers in achieving the WIOA Common Performance Outcome Measures.

##### Measures

- Employment retention six months post closure.
- Employment retention twelve months post closure.
- Median earnings six months post closure.
- Credential attainment rate.
- Measurable skills gains.
- Employer engagement.

##### PY 2022 WIOA Performance Measures In Vermont (for DVR and DBVI)

- Measurable Skills Gains were 56.7% and the national average was 48.7%.

- Employment Rate Second Quarter after Exit was 56.8% and the national average was 37.6%.
- Median Earnings Second Quarter after Exit was \$6,153 and the national average was \$5,130.
- Employment Rate Fourth Quarter after Exit was 55.4% and the national average was 52.8%.
- Credential Attainment Rate was 53.2% and the national average was 37.6%.

DBVI is a strong supporter of the WIOA Common Performance Measures. The new measures support consumers in their career goals and promote higher wages and more sustainable employment. The WIOA measures are extremely lagging, meaning most of the desired outcomes occur well after services end. For example, the measure of median earnings occurs two full quarters after case closure. As a result, the measures are not very useful in guiding the work of DBVI staff on a day-to-day basis. DBVI decided to establish the following leading measures:

- Leading Measure One: The use of career assessment tools to support exploration of higher wage and higher skill options.
- Leading Measure Two: The use of blindness adaptive skill evaluation and training.
- Leading Measure Three: The use of blindness assistive technology evaluation and training.

PY 2021 and PY 2022 Update:

- The percentage of case closures that had career assessment tools to support exploration of higher wage and higher skill options was 18% in PY 2021 and 5% in PY 2022.
- The percentage of case closures that had blindness adaptive skills training from the Vermont Association for the Blind and Visually Impaired was 67% in PY 2021 and 58% in PY 2022.
- The percentage of case closures that received Assistive Technology Evaluation and Training was 67% in PY 2021 and 58% in PY 2022

Targets for the Lead Indicators:

- 25% of cases will include use of career assessment tools to support exploration of higher wage and higher skill options.
- 60% of cases will include blindness adaptive skill evaluation and training.
- 60% of cases will include blindness assistive technology evaluation and training.

Strategies that contributed to the achievement of this goal included:

- DBVI is dedicated to assembling a highly skilled team that revolves around participants and their specific vocational goals. This comprehensive support encompasses various professionals, including Vision Rehab Therapists (VRTs), Certified Orientation & Mobility Specialists (COMS), an Assistive Technology Evaluator, and an Assistive

Technology Trainer. This collaborative approach consistently contributes to elevated success rates in these leading measures.

- DBVI continues to involve most consumers in services to build adaptive blindness skills and assistive technology skills. Having these skills helps consumers obtain and to keep employment.
- DBVI continues to use progressive employment opportunities to help consumers learn about the types of employment they like and don't like This can also be a way to demonstrate skills that lead to employment.
- DBVI continues to help consumers on a career path by advancing in their current jobs of starting new employment with new credentials, education, or special training.
- DBVI continues to build relationships with training partners such as National Industries of the Blind (NSITE) to identify training opportunities leading to industry recognized credentials, in addition to maintaining longstanding relationships with community and State colleges that provide post-secondary education opportunities for DBVI participants.

Factors that continue to impede implementation include:

- DBVI attributes the decline in assessment rates between PY 2021 and PY 2022 to the far-reaching effects of the COVID-19 pandemic. Acknowledging the inherent accessibility barriers of traditional career assessments, DBVI remains committed to seeking alternative approaches. To more effectively evaluate the transferable skills and interests of participants, DBVI will explore hands-on assessments through work experiences and progressive employment opportunities. Additionally, collaborative efforts with schools for the blind will be undertaken to gain insights into the accessibility of existing assessment tools.
- Transportation continues to be a major barrier for career advancement and high paying jobs. The highest paying careers are in Chittenden County and DBVI consumers cannot get there and do not want to relocate.
- DBVI is actively seeking virtual job opportunities as a strategy to have work from home opportunities, although a consistent and stable internet connection is a barrier to many individuals accessing these opportunities.

Goal 2. DBVI will increase the percentage of consumers earning more than minimum wage at closure.

Measures:

- The percentage of DBVI consumers with earnings less than 110% of minimum wage at employment closure.
- The percentage of DBVI consumers with earnings greater than 110% of minimum wage at employment closure.
- The percentage of DBVI consumers with earnings greater than 150% of minimum wage at employment closure.

Targets:

- DBVI consumers earning less than 110% of minimum wage at employment closure will be 20% or lower.
- DBVI consumers earning 110% or greater of minimum wage at closure will be 50% or higher.
- DBVI consumers earning 150% or greater of minimum wage at closure will be 50% or higher.

PY 2021 and 2022 Update:

- The percentage of DBVI consumers with earnings less than 110% of minimum wage at employment closure was 17% in PY 2021 and 23% in PY 2022.
- The percentage of DBVI consumers with earnings greater than 110% of minimum wage at employment closure was 83% in PY 2021 and 77% in PY 2022.
- The percentage of DBVI consumers with earnings greater than 150% of minimum wage at employment closure was 67% in PY 2021 and 50% in PY 2022.

Strategies that contributed to the achievement of this goal included:

- DBVI supports consumers in higher wage goals through a strong, collaborative relationship with Workforce Development Partners such as Vermont Association for Business, Industry, and Rehabilitation (VABIR) and ReSource.
- DBVI supports a dual-customer design to serve both the needs of the DBVI consumer and the employer.
- DBVI consumers who continue their post-secondary education have higher wage employment.
- Consumers who participate in progressive employment, vocational training, and industry credentials have higher wage employment.

Factors that continue to impede implementation include:

- Vermont currently has limited apprenticeship opportunities that are accessible to blind and visually impaired individuals. DBVI will continue to explore apprenticeship opportunities through participation in the Rural Youth Apprenticeship Development (RYAD) Learning Collaborative.
- Many Vermont companies have limited opportunity to advance in a specific role. In some cases, advancement requires that a person switch to a bigger company.
- Lack of proficiency in basic computer skills is a persistent barrier to individuals entering and advancing in the career force.

Goal 3. DBVI will increase consumer opportunities to participate in post-secondary education and training and gain industry recognized credentials.

Measure:



- Number of individuals achieving PSE credential attainment.

Targets:

- Number of individuals achieving PSE credential attainment will be 10.
- The number of individuals engaged in PSE credential training will be 30.

PY 2021 and 2022 Update:

- The number of individuals achieving PSE credential was 5 in PY 2021 and 6 in PY 2022.
- The number of individuals engaged in PSE credential training was 18 in PY 2021 and 19 in PY 2022.

Strategies that contributed to the achievement of this goal included:

- DBVI empowers individuals to pursue post-secondary education by collaborating with Teachers for the Visually Impaired (TVI). This strategic partnership facilitates early enrollment of students in high school, allowing DBVI counselors and team members to actively guide and support them in exploring a diverse range of post-secondary education opportunities.
- DBVI involves partners that can support consumers with adjustment and timing to pursue their post-secondary education goals.
- Involving students in the Learn, Earn, and Prosper program has helped students learn pre-employment skills and become motivated to pursue careers and additional education and vocational training.

Factors that continue to impede implementation include:

- Building industry recognized credentials continues to be a challenge. Many of the opportunities are not accessible for people who are blind. This goal requires creative solutions and finding partners who can provide accessible training opportunities. DBVI is actively looking for accessible credential building opportunities that are available virtually.
- Accessible opportunities available in the state tend to lack an industry-recognized credential upon completion of the training program.

Goal 4. In partnership with VDOL and Community Partners, DBVI will create more opportunities for DBVI consumers to participate in training programs.

DOL programs can offer DBVI consumers the opportunity to earn money while receiving necessary training to achieve a credential and higher wage employment.

Measure:

- DBVI consumers will enroll in DOL and other training programs.

Targets:

- The number of DBVI consumers enrolled in a DOL programs will be 4.

- The number of DBVI consumers enrolled in other training programs will be 40.

PY 2021 and 2022 Update:

- The number of individuals with DOL involvement was 6 in PY 2021 and 6 in PY 2022.
- The percentage of case closures that had services from the Vermont Association of Business, Industry and Rehabilitation was 31% in PY 2021 and 25% in PY 2022

Strategies that contributed to the achievement of this goal included:

- VABIR Employment Consultants create progressive employment opportunities that support DBVI consumers in finding competitive integrated employment.
- DBVI continues establish relationship with DOL initiatives.

Factors that continue to impede implementation include:

- Typically partner programs are not fully 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 5. DBVI will continue to implement highly effective Pre-Employment Transition Services (Pre-ETS) for students statewide.

Measures:

- DBVI will expand services overall to youth. The percentage of population served who were under age 22 at entry into DBVI services will increase.
- DBVI will increase the number of students participating in pre-ETS services.

Targets:

- The percentage of population served under age 22 at entry into DBVI services will be 25% or higher.

PY 2021 and 2022 Update:

- The percentage of population served who were under age 22 at entry into DBVI services has grown from 17% of people served in SFY 2014 to 27% of people served in SFY 2020 and remains substantial at 22% in SFY 2023.
- LEAP FFY 2023 Total Training Hours: 2,310
- Work-Based Learning Training hours (both in-person & virtual): 1,914
- Work Readiness Training & Self-Advocacy, Social and Leadership Instruction (both in-person & virtual): 315
- Orientation and Mobility with a COMS (both in-person & virtual): 72
- Independent Living Skills with a CVRT (both in-person & virtual): 58

The percentage of population served who were under age 22 at entry into DBVI services has dipped slightly from its recent average of 25% of people served. In SFY2023, 22% of people served had entered DBVI services before the age of 22.

Strategies that contributed to the achievement of this goal included:

- The Learn, Earn, and Prosper Program continues to expand. In addition to the summer residential program, LEAP now includes job readiness skills training throughout the school year and year-round virtual pre-ETS training.
- Through collaboration with the LEAP Program, DBVI is committed to providing high-quality pre-ETS services which focuses on creating a menu of transition services to blind and visually impaired youth.
- DBVI staff participate in the pre-ETS community of practice to learn best practices and collaborate with other states.
- DBVI staff meet regularly with the Teachers of the Visually Impaired in their region to learn about the pre-ETS needs of students on their mutual caseloads and to discuss referral of new students.

Factors that continue to impede implementation include:

- In FFY2023, overall training hours decreased by 209 hours. This decrease was mainly due to the fact that the residential program did not host an Intern in summer of 2023. Interns engage in programming close to eight weeks, full time and with a focus on their career interest. We did not have a student this past summer of that age or skill to engage in that level of programming. We hope to welcome Interns back next summer.
- The percentage of population served who were under age 22 at entry into DBVI services has dipped slightly from its recent average of 25% of people served. In SFY2023, 22% of people served had entered DBVI services before the age of 22. Vermont DBVI serves a small state with a low incidence disability. Due to this, DBVI anticipates that the number of students will fluctuate year to year.
- Some families are reluctant to have their student participate. The Teachers of the visually impaired are very helpful to encourage participation. Once students take the first step and try and event, they continue to be involved.

Goal 6. DBVI will continue to expand efforts to effectively serve employers through Workforce Partners.

The Business Account Managers (BAMS) are the primary employer engagement staff for DVR/DBVI. DVR/DBVI measures employer engagement through the following metrics:

- New Employer Contacts: These are defined as new contacts with employers who have never engaged with DVR/DBVI.
- Employer Activities: These are defined as engagement activities with employers who have an ongoing relationship with DVR/DBVI.

- **Employer Opportunities:** These are defined as specific participant opportunities such as a job opening, training opportunity, work-based learning opportunity, company tour or informational interview.
- **Caseload Driven Outreach:** Caseload driven outreach is defined as labor market outreach directly related to participants on counselors' current caseloads. Business Account Managers are tasked with directing two-thirds of their activities to caseload needs.

PY 2022 Update:

- New Employer Contacts: 1,573
- Employer Activities: 3,587
- Employer Opportunities: 2,194
- Caseload Driven Outreach: 776

Targets:

- New Employer Contacts: 1,600
- Employer Activities: 3,700 distinct engagement activities
- Employer Opportunities: 2,400 distinct participant opportunities
- Caseload Driven Outreach: 900 distinct participant opportunities

Strategies that contributed to the achievement of this goal included:

- The Business Account Managers are the main contact with businesses. They build the relationship and help match the employers needs with the skills of our DBVI consumers. This single point of contact has worked very well, and businesses appreciate that they are not being contacts by many different agencies.

Factors that continue to impede implementation include:

- Some businesses need very specific highly skilled employees that are not always on our caseloads. It works best when the employer has positions and are willing to provide on-the-job training or apprenticeships.
- Some businesses lack education on accommodations that serve the blind and visually impaired.

Goal 7. DBVI will continue to seek opportunities to expand and/or improve services for underserved populations including individuals who need supported employment.

DBVI recognizes that there continues to be populations of Vermonters with disabilities that are unserved or underserved in the state. These include, but are not limited to:

- Individuals with developmental disabilities who do not meet the developmental services system eligibility criteria or system of care priorities.
- Individuals with other severe disabilities, including individuals who are deaf-blind who need supported employment.

DBVI will partner with DVR to explore opportunities to expand or improve services to address the unmet needs of these groups. This includes exploring new partnerships or expanding existing partnerships with other agencies, funding sources and stakeholders.

Measures:

- Number of individuals served who identified as minorities.
- Number of individuals served who received supported employment services.
- Number of individuals served with a disability impairment of "Deaf-blindness."

Targets:

- Number of individuals served who identified as minorities will be 10%.
- Number of individuals served who received supported employment services will be 5.
- Number of individuals served with a disability impairment of "Deaf-blindness" will be 3.

PY 2021 and 2022 Update:

- There was 1 individual served in PY 2021 and no individuals served in PY 2022 who received supported employment services.
- There were 3 individuals served in PY 2021 and 2 individuals served in PY 2022 with a disability impairment of "Deaf-blindness."
- There were 11% (30 individuals) of the caseload who identified as minorities in PY 2021 and 12% (34 individuals) in PY 2022.

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.
- 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.
- DBVI partners which programs serving youth with developmental disabilities such as Project Search and College Steps.

Factors that continue to impede implementation include:

- DBVI recognizes the need to expand relationship with local Designated Services Agencies and focus on training and capacity building to deliver high quality supported employment services.
- 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.

- 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.
- DBVI recognizes that education to families about the supported employment process can be confusing and overwhelming. More focus should be placed on ensuring families have a full understanding of the application process and services provided.

Goal 8. Consumer satisfaction with DBVI services will be maintained or increase.

Measure:

- The survey instrument includes many questions to determine overall satisfaction with DBVI services and many subcategories of reporting that are used for program improvement.

Target:

- In the next Consumer Satisfaction Survey, at least 95% of respondents will report that they are satisfied with the DBVI vocational rehabilitation program.

PY 2021 and 2022 Update:

The most recent customer satisfaction preliminary results of the 3-year statewide random survey of all participants in the DBVI Vocational Vision Rehabilitation program. The current survey began in December 2021 and the final report was made available in March 2022.

- 97% of VT DBVI consumers report overall satisfaction; the highest rate on record (up from 92% in 2017).
- 97% felt that staff treated them with dignity and respect (up from a low of 95% in 2017).
- 93% report that services met their expectations (continuing a slight upward trend seen in prior years).
- 96% said that staff were helped to achieve their DBVI goals (up from 94% in 2017).
- 91% felt that the services they received helped them become more independent (up from 88% in 2017).

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.

- DBVI is focused on providing staff with continued education and training for continuous improvement.

Factors that continue to impede implementation include:

- The most common challenge for complete consumer satisfaction is effective communication. Consumers who exit the program without employment often site difficulties with communication. In many cases this is related to expectations that are outside of the DBVI program.
- Co-occurring factors such as homelessness, mental health, or addiction can have an impact on the ability to effectively communicate throughout an individual's involvement with DBVI services.

### **Overall Program Results and Highlights**

This year DBVI held several White Cane events in each of the DBVI regions. The intent was to educate the public about White Cane Safety Awareness. The white cane is a symbol of strength and independence, used by people who are blind as they travel independently. Many members of the public and community leaders usually attend and participate in a simulated walk in the community facilitated by an Orientation and Mobility instructor to increase the awareness of what it is like to travel with the white cane.

The DBVI events were held this year in Barre, Burlington, Rutland, and Springfield. Each event included an experiential walk through each town and guest speakers who discussed specialized technology used by people who are blind. Participants included many individuals who are blind or visually impaired and several town officials who wanted to learn ways to promote safe travel for people who are blind in their town.

The Vermont Association for the Blind and Visually Impaired (VABVI) was granted permanent additional funding of \$100,000 from the State to assist in reducing the social isolation of older Vermonters by providing additional instruction in through training Speech, Magnification, Access, Technology, Reading and Telecommunications (SMART). Historically, through the previous two rounds of temporary COVID Relief Funding (CRF), about 90% of all clients who completed these services, reported feeling less socially isolated and better off for having received SMART Services. Of those who did not report a change in their feelings of social isolation, the causes were due to extenuating circumstances not related to their vision or receipt of the training. Clients who received benefit were able to accomplish at least one or more tasks, such as video conferencing with their doctor, video/teleconferencing with the Peer Assisted Learning Session (PALS) Groups, communicating with family and friends through various modes of technology, having groceries delivered, and more.

DBVI also partnered and assisted with the DVR HireAbility Vermont Transition Core Teams Virtual Conference. This statewide event brought together Transition Core Teams from schools and employment service providers to share ideas about how to assist students with disabilities with their employment goals.

DBVI staff work towards continuous improvement by listening to the voice of customers and using that information and data to improve performance. An updated DBVI State Plan with new goals and strategies was completed and approved by the State Rehabilitation Council in

February 2022 and can be found at <https://dbvi.vermont.gov/resources/publications>. The next state plan is due in March 2024. Please also visit the success story link on DBVI's website at [www.dbvi.vermont.gov](http://www.dbvi.vermont.gov) to see examples of people reaching their goals.

The federal Workforce Innovation and Opportunity Act (WIOA) requires DBVI to use 15% of its federal grant award to provide Pre-Employment Transition Services (Pre-ETS) creating an opportunity for DBVI to expand Pre-ETS services in the core areas:

- Job exploration counseling.
- Work-based learning opportunities.
- Counseling on post-secondary educational opportunities.
- Workplace readiness training.
- Instruction in self-advocacy.

DBVI has been successful in expanding Pre-ETS services for students who are blind or visually impaired by providing work-experiences, internships, and job readiness training to build skills necessary for career development. Learn, Earn, and Prosper (LEAP) is a program developed by DBVI to achieve these goals. Students participate in a slate of different options year-round to learn job readiness and self-advocacy skills, and to engage in work-based learning experiences. LEAP's in-person and residential programming returned in 2022 after Vermont lifted COVID restrictions. LEAP also continued its year-round virtual programs. Virtual programs have become a significant access point for participants and families who are not yet ready for a residential experience. Check out DBVI's new LEAP video.

### **DBVI Future Directions:**

DBVI believes the best path forward for people with visual impairments includes a solid foundation in technology. DBVI staff stay current to help customers achieve their employment and independence goals. For example, several new apps are including artificial intelligence This allows blind users to use the camera in the smart phones to identify objects, read text, identify colors, and provide information about products in the store.

DBVI continued with the third year of a Rural Youth Apprenticeship learning collaborative with a focus on creating apprenticeship opportunities in a rural state. This was a competitive process and other states include Arkansas and Wyoming. The learning opportunities are facilitated by the team from University of Massachusetts - Boston in their Rural Apprenticeship Development program. It is a 5-year grant with the goal of creating apprenticeship opportunities for people who are blind in Vermont.

### **Program Overview for Students:**

The LEAP Program provides blind or visually impaired students and young adults, ages 14-24, the opportunity to gain skills to be independent, confident, and productive. As a workforce development program delivering Pre-Employment Transition Services, LEAP provides work-based learning experiences, internships, and workshops with the outcome of increased employability.



LEAP offerings focus on work-based learning experiences, job readiness skills and self-advocacy instruction, including effective written and verbal communication, partner and teamwork, cooperation, independent problem-solving, professionalism, supporting others, disability understanding and disclosure, goal setting, use of accommodations, leadership, assertiveness, and mobility.

In 2023, LEAP partnered with Vermont Center for Independent Living (VCIL), Big Heavy World, ReSOURCE's Administration Department, Vermont Digger, Vermont Story Lab, Amanda Rodda (TVI and math/computer science educator based in Washington), Burlington Media Factory, the Overlook Cafe, ReSOURCE, and Vermont Garden Network to provide internships and work-based learning experiences.

LEAP connected students with experts and professionals in their fields from across the country. Students engaged in a diverse array of virtual trainings and professional speaker retreats. Many of these speakers were blind or visually impaired themselves and shared their successes in their careers.

## **Recent Developments and Accomplishments**

### OSEP Grant Funding

In August 2023 LEAP was awarded a 5-year grant from the Office of Special Education Programs (OSEP). This grant's intention is to provide assistive technology and college and career readiness training for secondary students with sensory disabilities. It is intended to increase collaboration between students and transition networks, and increase vocational, college, and technology skills in transition aged students - starting as young as sixth grade.

LEAP is utilizing funding from OSEP to develop "LEAP Connect." This endeavor will integrate Assistive Technology training curriculum into all of our existing programming and develop brand new programs to offer additional opportunities to a wider range of students. New activities will include a mentoring program, work readiness training programs for 6th-9th grades, Assistive Technology training, and more. See "Future Directions" for further details.

## **LEAP Programs in 2023**

### Year-round Virtual Work-Based Learning Opportunities

Students completed work-based learning projects during each season to develop independence, professionalism, and leadership skills. Programs were four to eight weeks, and students received hourly wages.

Experienced LEAP Supervisors supported participants through daily supervision and weekly team meetings. Weekly meetings offered participants a chance to celebrate success, share updates, demonstrate learning, access resources, and receive feedback.

- Narrative Writer & Content Creator - Fall 2022: Narrative Writer project participants met for weekly work sessions led by Becky Holt, executive director of the Vermont Story Lab, where they discussed elements of developing a strong personal narrative and writing techniques for telling their unique stories of advocacy and disability disclosure. Participants completed weekly tasks to develop their skills and create an end product of a story to be posted on LEAP's social media accounts. Several students elected to

participate in two additional weeks of video content creation led by Gin Ferrara and Ross Ransom of the Burlington Media Factory. Students used tools such as microphones, cameras, and editing apps, to create a video telling their story in a 1–2-minute video.

- VT Digger Internship - Winter 2022: One student worked with VT Digger’s Underground Workshop, a collaborative network of high school and college age journalists, to develop, write, and publish an article. The student interviewed multiple Vermont residents who are blind and visually impaired to learn about their experiences with public transportation in the state. The student worked closely with the Underground Workshop’s staff and peer editors to develop and review their article. Check out the article here: <https://vtdigger.org/2023/04/09/blind-vermonters-share-their-challenges-with-public-transit-and-the-struggle-for-independence/>
- Interview Guide Creator - Spring 2023: Participants met for weekly work sessions led by Becky Holt, and worked collaboratively to develop a job interview guide, full of tips and best practices. The guide was used in LEAP's Summer Residential Program to help students gain confidence and prepare for mock interviews. Participants received instruction and discussed key pieces of interviewing for a job, such as identifying hard and soft skills, researching the position prior to the interview, and arriving on time. Participants also had the opportunity to complete weekly bonus assignments, where they shared insight on their experiences with visual impairment, self-advocacy, and more. These were posted on LEAP’s social media.
- Marketing Content Developer – Summer 2023: Participants met for twice weekly work sessions led by Becky Holt, Gin Ferrara and Ross Ransom. Participants worked collaboratively to develop a LEAP marketing campaign that focused on sharing students’ LEAP experiences and promoting the variety of opportunities LEAP offers. Participants received instruction and discussed components of creating a marketing campaign, such as developing a slogan, defining the message, and drafting thoughtful interview questions. Check out the videos are students made! An interview with K, an interview with R, and an interview with A.
- App Developer: Amanda Rodda, a TVI, computer science, and math educator based in Washington, led twice weekly work sessions for App/Game Design and Development. Participants learned coding skills, including the coding language Quorum, and the elements of designing an engaging and educational game. Participants worked in small groups to plan their game and write their code. Each group conducted a client needs survey with LEAP Program Staff to understand what they wanted the final product to accomplish. Based on this feedback, the participants designed a game to teach new students how to complete their hiring paperwork and track their hours worked. Play one of the games here! (Use Control+R to start the game).
- Virtual SkillShops - Fall 2022, Spring 2023, Summer 2023: Three to six workshops, offered weekly, accompanied each season of work-based learning programs. Workshops included (and continue to include):
- Mobility lessons with a Certified Mobility Instructional Specialist (COMs);
- Independent living skills with a Certified Vision Rehabilitation Therapist (CVRT).

- Culinary Camp: Students learn to make simple recipes at home with a CVRT.
- Speaker Retreats: Students connected with professionals from around the country who are blind or visually impaired.
- Virtual social gatherings that mirrored aspects of residential programming such as Coffeehouse Talent Night; Friday Round Up, where students shared weekly successes; and weekly Dine-Ins, where students socialized via Zoom.
- Welcome to the Working World: workshops focused on professional skills including email writing, job interviews, disability disclosure, and resume writing.
- Disability Disclosure: Students learn about the values and challenges of disability disclosure in school and professional settings. Students heard from professionals about their experiences disclosing their visual impairment and drafted disclosure statements.
- Self-Advocacy workshops: Workshops focused on developing self-advocacy skills by hearing from peers and professionals, participating in self-determination activities, and developing an understanding the importance of self-advocacy in school, work, and recreation.
- ABLE Library/National Library Service: Representatives from the ABLE library shared about the services available through the National Library Service.

In February 2023, LEAP students had the opportunity through Inclusive Arts Vermont to attend a virtual tour of several pieces of art created by blind and visually impaired artists. Students also received a package of tactile items representing each art piece. The virtual tour included audio descriptions of each art piece, guided discussion and interpretation of each piece, and the chance to network with peers and Vermont artists.

### In-Person Programming

Weekend Retreats – Fall 2022, Winter 2023, Spring 2023: In Fall 2022, LEAP participants celebrated White Cane Awareness Day and learned about disability disclosure by participating in workshops and networking with community members. Participants joined community members to participate in a White Cane Walk on Church Street in downtown Burlington, followed by a discussion about their experiences being visually impaired.

A Vermont student shared: “Waking up every day and trying is a choice. We all have the option to choose if we use our accommodations to navigate the world.”

Participants’ family members joined for a panel about disability disclosure where professionals who are blind and visually impaired shared about their experiences with disclosure.

In Winter 2023, LEAP returned to the USABA’s annual Ski & Snowboard Festival at Pico Mountain following a two-year hiatus. Freezing temperatures didn’t stop participants from enjoying a weekend with Vermont Adaptive Ski & Sports (VASS) guides and other event participants. Participants challenged themselves to rock climb, ski, and snowboard – some of them for the first time ever! Two participants skied from the summit of Pico Mountain!

When they weren’t hitting the slopes, participants engaged in networking challenges to make new connections and develop their relationships.

In Spring 2023, LEAP headed to Montpelier for a team-building themed weekend. Participants joined DBVI and VABVI's Great Expectations and Tech Fair event, where they were able to network with a wide variety of professionals who are blind and visually impaired, as well as service providers. Throughout the weekend, the group explored downtown Montpelier, visiting the State House and local businesses. The group worked together as a team to break out of a board game themed escape room at the Greatest Caper. They also designed and created a collaborative mural with Burlington-based art teacher, Beth Starger.

### Year-Round Community Internships

In partnership with the Overlook Café and ReSOURCE Burlington, LEAP supported three participants who engaged in year-round work experiences.

With support from LEAP and work-site staff, the participants learned about food preparation, kitchen cleaning, and maintenance at the Overlook, and customer service, processing donations, cash register skills, and more at ReSOURCE. All participants developed soft skills, including effective and professional communication, time management, uniform standards, and teamwork.

One student's family shared that his work at ReSOURCE contributed to his self-confidence and independence as he learned to navigate his schedule and transportation needs.

### Residential Work Experiences - Summer 2023

Participants in the Residential Work Experience program lived and worked together in Burlington for three weeks this past summer. They worked up to 32 hours/week at either a ReSOURCE store location or the Overlook Café. Participants became essential members of the worksite teams, assisting with daily operations, customer service, and meaningful projects.

At the ReSOURCE stores, participants worked across all departments to process and price donations, repair items, shelve items, maintain department organization, and provide assistance to customers. At the Overlook Café, participants prepared meals for customers, maintained kitchen cleanliness in line with Department of Health standards, and rang up customers using the adaptive talking register.

One day a week, participants engaged in personal-professional development workshops, including résumé writing, job interviewing, mock interviews, an information session with UVM's accommodations office, and a tour of the UVM campus.

Participants also built a community and gained independent living skills, sharing space in a St. Michael's College residence hall. Throughout the program, participants attended multiple workshops with a COMs and VRT, including group and individual mobility lessons, cooking workshops, and independent living skills workshops where they learned how to do dishes and use the laundry machines. Participants maintained their living space, prepared shared meals together, and completed individual and group chores. They developed mobility skills by commuting to work and activities via the bus, rideshares, and on foot. Participants also engaged in recreational activities including biking, kayaking, rock climbing, bowling, and shopping.

Adam\* attended the residential program this summer after working in the ReSOURCE store as a trainee and attending weekend retreats over the past two years. Despite some initial homesickness, Adam pushed himself to stick with it. For the first time, he managed his schedule

independently, packed lunches for himself, cooked dinner, and shared responsibility with his peers to maintain their living spaces.

Adam's mom shared, "What Adam's dad and I found is that LEAP improved his independence, time-management, and daily living skills such as meal prep and laundry. Before, we didn't think he could do things like that independently, but now we know he can because he did it at LEAP."

### Residential Internships - Summer 2023

Residential interns completed internships at an organization that aligned with their career and personal interests. Interns were placed at ReSOURCE's Administration office, Big Heavy World, and the Vermont Center for Independent Living.

Residential interns were responsible for managing their own schedules and projects and commuting to work independently. With support from LEAP, they engaged in meaningful and relevant work at their partner organizations, as well as enjoying the recreational opportunities LEAP offered. The interns lived at St. Michael's College and acted as excellent role models for the younger students.

Carter\* returned for his second summer as a Residential Intern. He leveraged the connections he made with the Burlington music scene the previous year to schedule shows throughout the summer, including the Burlington Discover Jazz Festival. Carter also shared about his internship, "I appreciated being able to work at VCIL both summers. I like the idea of sticking with the same organization and supervisor in order to showcase myself in different capacities. The work I did at VSO the first summer informed my work at Big Heavy World – I was more familiar with the Burlington music community, so I could walk into a room with more knowledge and create more music connections."

### **Future Directions:**

#### OSEP Grant Activities

With Grant funding from the Office of Special Education (OSEP), LEAP will introduce a variety of new activities for Vermont students. All programs will incorporate training in Assistive Technology. LEAP will introduce a mentoring program, Individualized Technology Plans, LEAP Start (for students in 6th to 9th grade), specific AT curriculum for SkillShops and retreats, and AT on Demand.

To implement these new activities, LEAP is developing partnerships with a range of exciting collaborators including iSight Rehab, the American Printing House for the Blind (APH), and the University of Massachusetts, Boston. LEAP will begin to pilot these programs next year and is excited to share more details about these new activities as they are developed.

#### The Return of Intro to LEAP

Prior to the COVID pandemic, LEAP welcomed students not yet ready for the full residential program to stay in a college dorm for 3-5 days and engage with community projects and volunteer opportunities around Burlington. In the summer of 2024, LEAP will once again offer Intro to LEAP.

Intro to LEAP gives students a first look at what a work experience through LEAP could look like and introduces them to the skills associated with living independently in a college dormitory.

Intro to LEAP is an excellent first step for students who may be unsure about engaging with LEAP's longer residential program and gives them the chance to meet our staff, engage with the community, live independently, and have fun!

### Results

2023 Hours

Total Training Hours, LEAP 2023: 2,359.39

Work-Based Learning Training hours: 1,914.39

Work Readiness Training & Self-Advocacy Instruction: 315.00

Orientation and Mobility with a COMS: 72.00

Independent Living Skills with a CVRT: 58.00

In FFY2023, overall training hours decreased by 209 hours. This decrease was mainly due to the fact that the residential program did not host an Intern in summer of 2023.

Intern's engage in programming close to eight weeks, full time and with a focus on their career interest. We did not have a student this past summer of that age or skill to engage in that level of programming. We hope to welcome Interns back next summer.

### **Success Stories**

Watch Our New Videos!

LEAP partnered with Burlington Media Factory and Vermont Story Lab to create new videos to showcase our virtual programming and the BEP Program's Overlook Cafe.

LEAP Virtual Programs

Overlook Cafe

Lena\* completed her first paid work experience at the Overlook Café shortly after turning 14. For two weeks, she supported café operations by cleaning the dining space, operating the cash register, and preparing recipes for daily specials. Her goal was to learn how to operate the cash register. She also gained confidence and worked toward independently completing transactions. Lena's mom shared this insight with LEAP staff: "WOW, what a great experience this has been for Lena so far. She's elated every day with all the skills she's learning. It's clear that even in this short period of time, she's feeling a big sense of capability and independence."

Lucas\* used his Community Internship as an opportunity to develop his mobility skills. With training from a Certified Orientation and Mobility Specialist, Lucas learned bus and walking routes from his mom's work to the Overlook Café and ReSOURCE Burlington, as well as to the Saint Michael's College dorm where Residential Program participants were staying. One day, Lucas got off the bus one stop early, and he didn't recognize the area of campus he was on. He shared with LEAP staff that while he was initially anxious, he took a deep breath and remembered back to his O&M training. He identified campus landmarks, successfully problem-solved, and independently located the dorm.

Anna\* graduated high school in the spring of 2023 and joined LEAP for her second Residential Program over the summer. She was eager to return to the Overlook Café and continue developing skills she learned last summer. Anna took responsibility for the café's coffee bar and learned to brew coffee independently. She took initiative to ensure the area was well-stocked and tidy and was proud of her role in supporting the café's daily operations. This fall, Anna has continued working at the café two days a week. She is challenging herself to provide high-quality customer service by learning to use the cash register independently and preparing orders efficiently.

Mia\* started with LEAP when she was 14 years old, and quickly honed her customer service and time-management skills. Throughout high school, she worked at a local Price Chopper, and joined LEAP for weekend retreats in which she took on leadership opportunities to support her peers. Mia graduated high school in the spring of 2023 and started culinary school in the fall.

### **Quotes from 2023 LEAP Students:**

Virtual work-based learning students discussed LEAP's "personality" in a breakout session during the summer 2023 program. Below are some of the thoughts they shared:

1. LEAP is "welcoming," a place "to conquer your first-job fears."
2. LEAP is "community where you feel safe and accepted," and a "friendly work environment."
3. LEAP is where you "Learn independence and have fun."
4. LEAP is where you "Make connections. Make friends."
5. "Do it! It teaches you new skills, you work with people who are blind and visually impaired and earn money."

### **2. PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR, REFLECTING ACTUAL AND NEGOTIATED LEVELS OF PERFORMANCE. EXPLAIN ANY DISCREPANCIES IN THE ACTUAL AND NEGOTIATED LEVELS; AND**

Vermont's DVR and DBVI programs also received data for the first time on all five WIOA Common Performance Measures and how we compared to national averages. This data shows that:

- Vermont DBVI/DVR consumers are achieving all outcomes at a higher rate than the national average on all five performance measures.
- The employment rate two quarters post exit moved from 51.1% in SFY 2020, to 53.3% in SFY 2021 and 2022, and 56% in SFY 2023.
- The median earnings two quarters post exit was below the national average in SFY 2020 to being above it in SFY 2021 and has continued to rise since from \$3,901 in SFY 2020, \$4,630 in SFY in 2021, \$5,213 in SFY 2022, and \$6,153 in SFY 2023.
- See Goal #1 above for Performance Measures that are specific to the DBVI program.

Based on the data gathered and discussions with the State Rehabilitation Council and DBVI, the following are the key findings of the CY 2021, CY 2022, and CY 2023 DBVI Comprehensive Needs Assessment.

- DBVI needs to create apprenticeship opportunities.
- DBVI needs to identify and implement strategies to increase consumer hourly wages at closure.
- DBVI consumers need opportunities to gain industry recognized credentials in skilled professions.
- DBVI must develop strategies to meet and exceed the outcome targets under the Common Performance Measures.

The WIOA Common Performance Measures significantly change the way DBVI is measured. The emphasis on career development, credential attainment, and measurable skills gains, will require DBVI to consider changing current practice. As previously noted, DBVI will be looking at strategies to increase wages and assist consumers in obtaining industry recognized credentials. In addition, DBVI will continue to help consumers develop a career path.

<b>MEASURE</b>	<b>NATIONAL AVERAGE SFY 20</b>	<b>VERMONT RESULTS SFY 20</b>	<b>NATIONAL AVERAGE SFY 21</b>	<b>VERMONT RESULTS SFY 21</b>	<b>NATIONAL AVERAGE SFY 22</b>	<b>VERMONT RESULTS SFY 22</b>
MEASURABLE SKILLS GAINS	31.4%	49.3%	43.3%	49.0%	43.0%	57.3%
EMPLOYMENT RATE 2 QUARTERS POST EXIT	51.3%	51.1%	48.6%	53.3%	52.5%	53.3%
EMPLOYMENT RATE 4 QUARTERS POST EXIT	43.6%	49.7%	44.0%	48.3%	48.0%	52.0%
MEDIAN EARNINGS 2 QUARTERS POST EXIT	\$4,005	\$3,901	\$4,280	\$4,630	\$4,776	\$5,213
CREDENTIAL ATTAINMENT	NA	NA	23.2%	42.5%	30.8%	42.5%

**3. THE USE OF FUNDS RESERVED FOR INNOVATION AND EXPANSION ACTIVITIES (SECTIONS 101(A)(18) AND 101(A)(23) OF THE REHABILITATION ACT) (E.G., SRC, SILC).**

Innovation and Expansion funds have been used to support employment related initiatives as outlined in the State Plan for Independent Living (SPIL) submitted by the Statewide



Independent Living Council (SILC). The DBVI Director actively participates in SILC activities and helps to coordinate employment related initiatives in the SPIL and DBVI Goals and Priorities.

One area of overlap is related to people who are deaf and blind. The SILC and DBVI have both identified this as an underserved group. Both entities are working together to develop strategies to meet these needs. Now implementing the Support Service Program which are helping individuals who are deaf and blind to access the community and employment settings. Another area of mutual interest is transportation. This is essential for employment and requires collaboration and creativity in a rural state.

E. SUPPORTED EMPLOYMENT SERVICES, DISTRIBUTION OF TITLE VI FUNDS, AND  
ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED  
EMPLOYMENT SERVICES.

1. ACCEPTANCE OF TITLE VI FUNDS:

(A) VR agency requests to receive title VI funds.

2. IF THE VR AGENCY HAS ELECTED TO RECEIVE TITLE VI FUNDS, SECTION 606(B)(3) OF THE  
REHABILITATION ACT REQUIRES VR AGENCIES TO INCLUDE SPECIFIC GOALS AND  
PRIORITIES WITH RESPECT TO THE DISTRIBUTION OF TITLE VI FUNDS RECEIVED UNDER  
SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED  
EMPLOYMENT SERVICES. DESCRIBE THE USE OF TITLE VI FUNDS AND HOW THEY WILL BE  
USED IN MEETING THE GOALS AND PRIORITIES OF THE SUPPORTED EMPLOYMENT  
PROGRAM.

DBVI realizes that it serves customers with the most significant disabilities who at times require vocational support beyond the scope of DBVI's standard services. DBVI receives a grant award of \$6,000 from RSA of Title VI, Part B funds to provide supported employment 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 after the person is employed. DBVI coordinates with the Division of Vocational Rehabilitation (DVR) to provide the majority of supported employment services. 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 will utilize internal controls to meet the requirements for reserving and expending 50 percent for youth, meeting the required match, and not exceed the administrative cap of 2.5 percent for administration.

3. SUPPORTED EMPLOYMENT SERVICES MAY BE PROVIDED WITH TITLE 1 OR TITLE VI  
FUNDS FOLLOWING PLACEMENT OF INDIVIDUALS WITH THE MOST SIGNIFICANT  
DISABILITIES IN EMPLOYMENT. IN ACCORDANCE WITH SECTION 101(A)(22) AND SECTION  
606(B)(3) OF THE REHABILITATION ACT, DESCRIBE THE QUALITY, SCOPE, AND EXTENT OF  
SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST  
SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES;  
AND THE TIMING OF TRANSITION TO EXTENDED SERVICES.

DBVI works closely with DVR and the Designated Agencies, sixteen non-profit community-based member agencies offer care to Vermonters affected by developmental disabilities, mental health

conditions, and substance use disorders to assess individuals on the DBVI caseload who are eligible for supported employment services. Each DBVI Counselor has the necessary information to contact the assessment coordinator at the Designated Agencies in their region. DBVI Counselors also participate as part of IEP teams that consider eligibility for supported employment services through the Designated Agencies. These collaborative efforts make it possible for DBVI staff to coordinate evaluations for eligibility and timely referrals as part of the IEP process with the Local Education Agencies. DBVI Counselors make sure that staff from the appropriate DA is involved in the IEP meetings if they have not already been included by the LEA.

In some cases DBVI and DVR will have a dual case open and provide different services depending on the primary disability. This is also discussed at IEP and other team meetings. The key for DBVI staff is to create strong connections with the LEA, DVR, and DA(s) in their region and to discuss the needs and eligibility of individuals who will benefit from supported employment services. The DBVI Director also has direct access to the supported employment coordinator for the larger umbrella Department and often meets with her for updates in the Developmental Disabilities system and to receive guidance about individual situations.

For these collaborations, DBVI uses Title I funds for pre-placement assessment and training activities; and Title VI B for post placement supported employment services. Extended services for youth with the most significant disabilities for up to four years until age 25 and up the maximum of four years are provided when appropriate. Individual Medicaid waiver funds are used to provide the ongoing support.

4. SECTIONS 101(A)(22) AND 606(B)(4) OF THE REHABILITATION ACT REQUIRE THE VR AGENCY TO DESCRIBE EFFORTS TO IDENTIFY AND ARRANGE, INCLUDING ENTERING INTO COOPERATIVE AGREEMENTS, WITH OTHER STATE AGENCIES AND OTHER APPROPRIATE ENTITIES IN ORDER TO PROVIDE SUPPORTED EMPLOYMENT SERVICES. THE DESCRIPTION MUST INCLUDE EXTENDED SERVICES, AS APPLICABLE, TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THE PROVISION OF EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES IN ACCORDANCE WITH 34 C.F.R. § 363.4(A) AND 34 C.F.R. § 361.5(C)(19)(V).

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 agreements with the Vermont Developmental 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.

## F. ANNUAL ESTIMATES

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 C.F.R. § 361.29(b), annual estimates must include the following projections:

1. ESTIMATES FOR NEXT FEDERAL FISCAL YEAR—

A. VR PROGRAM; AND

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**The VR Program;**

**Current Narrative:**

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
NA	283	283	\$550,000	0

B. SUPPORTED EMPLOYMENT PROGRAM.

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Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
NA	8	8	\$6,000	0

**G. ORDER OF SELECTION**

1. PURSUANT TO SECTION 101(A)(5) OF THE REHABILITATION ACT, THIS DESCRIPTION MUST BE AMENDED WHEN THE VR AGENCY DETERMINES, BASED ON THE ANNUAL ESTIMATES DESCRIBED IN DESCRIPTION (F), THAT VR SERVICES CANNOT BE PROVIDED TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR AND ARE DETERMINED ELIGIBLE FOR SERVICES.

\* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

The VR agency is not implementing an order of selection and all eligible individuals will be served.

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—

A. THE JUSTIFICATION FOR THE ORDER

DBVI does not have an order of selection.

B. THE ORDER (PRIORITY CATEGORIES) TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES ENSURING THAT INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

DBVI does not have an order of selection.

C. THE VR AGENCY'S GOALS FOR SERVING INDIVIDUALS IN EACH PRIORITY CATEGORY, INCLUDING HOW THE AGENCY WILL ASSIST ELIGIBLE INDIVIDUALS ASSIGNED TO CLOSED PRIORITY CATEGORIES WITH INFORMATION AND REFERRAL, THE METHOD IN WHICH THE VR AGENCY WILL MANAGE WAITING LISTS, AND THE PROJECTED TIMELINES FOR OPENING PRIORITY CATEGORIES. NOTE: PRIORITY CATEGORIES ARE CONSIDERED OPEN WHEN ALL INDIVIDUALS IN THE PRIORITY CATEGORY MAY BE SERVED.

DBVI does not have an order of selection.

3. HAS THE VR AGENCY ELECTED TO SERVE ELIGIBLE INDIVIDUALS OUTSIDE OF THE ORDER OF SELECTION WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT?

No

#### H. WAIVER OF STATEWIDENESS.

The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with Section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 C.F.R. § 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 C.F.R. § 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."

Not Applicable.

#### I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT.

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the State VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

1. ANALYSIS OF CURRENT PERSONNEL AND PROJECTED PERSONNEL NEEDS INCLUDING—

A. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

B. THE NUMBER AND TYPE OF PERSONNEL THAT ARE EMPLOYED BY THE VR AGENCY IN THE PROVISION OF VOCATIONAL REHABILITATION SERVICES, INCLUDING RATIOS OF QUALIFIED VOCATIONAL REHABILITATION COUNSELORS TO CLIENTS;

C. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES IN 5 YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.

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Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Blind Services Director	1	1	1
Blind Services Assistant	1	1	1

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Director			
Blind Services Program Manager	1	1	1
LEAP Program Manager	1	1	1
Blind Services Program Coordinator	1	1	1
Senior Rehabilitation Counselor	1	1	1
Rehabilitation Counselor II	2	2	2
Rehabilitation Counselor I	0	0	0
Rehabilitation Associate II	1	1	1
Rehabilitation Associate I	1	1	1
Adaptive Technology Coordinator	1	1	1

D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

1:57

The Vermont Division for the Blind and Visually Impaired (DBVI) operates in the Department of Disabilities, Aging, and Independent Living (DAIL) in the Agency of Human Services (AHS). DBVI employs 11 Full Time Equivalent (FTE) staff positions. DBVI is organized to allow a structure for advancement based on increased professional abilities, knowledge, leadership, improved services, and outcomes and is headed by the Division Director.

In FFY 2022 DBVI served 258 clients and FFY 2023 served 283 clients. DBVI has sufficient staff to meet the vocational rehabilitation needs of clients. DBVI has four regional offices. DBVI has five VR counselors that will serve 283 clients, averaging 57 consumers per counselor.

Two Rehabilitation Associates along with the Blind Services Program Coordinator have divided administrative responsibilities to support the vocational rehabilitation and independent living programs in the northern and southern regions of the state. The Blind Services Program Coordinator also provides administrative support to grants, contracts and supported employment.

A Rehabilitation counselor was promoted to DBVI Program Manager in FY2023 to support data management and quality assurance. A second Rehabilitation counselor was promoted to Blind Services Assistant Director in FY2023 to support grant management and personnel. Both

positions continue to maintain their Rehabilitation Counselor duties in addition to added responsibilities.

A Rehabilitation Associate was promoted to Blind Services Program Coordinator in FY2023. The position continues to provide administrative support and serve the independent living program in the Springfield regional office.

A LEAP Program Manager position was added in FY2020 to provide increased capacity to serve Pre-ETS students year round and to support DBVI's Business Enterprise Program.

Technology services are provided by the Blind Services Assistive Technology Coordinator and a contracted professional Rehabilitation Technology expert. The Assistive Technology Coordinator provides AT training services for clients for the entire state. DBVI has two Employment Consultants contracted through VABIR (Vermont Association of Business Industry and Rehabilitation) serving the Burlington and Montpelier regional offices.

DBVI maintains a high level of performance. The current personnel structure is designed to ensure DBVI clients are well served, including those with significant disabilities, students and adults requesting vocational rehabilitation services. DBVI is proud of its quality customer service and ability to quickly establish eligibility and develop service plans.

**E. PROJECTED NUMBER OF INDIVIDUALS TO BE SERVED IN 5 YEARS:**

330

**2. DATA AND INFORMATION ON PERSONNEL PREPARATION AND DEVELOPMENT, RECRUITMENT AND RETENTION, AND STAFF DEVELOPMENT, INCLUDING THE FOLLOWING:**

**A. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM; THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.**

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One Associate Counselor completed an M.S. in Counseling with a concentration in Rehabilitation Counseling through the University of Southern Maine's (USM) online, distance learning program funded by an RSA long-term training grant to USM in August 2021.

One Rehabilitation Counselor II with a master's degree completed the Vision Specialist Certificate Program through Mississippi University in October 2021.

One Rehabilitation Counselor with a master’s degree completed the four required core rehabilitation courses in 2022.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates

**B. THE VR AGENCY’S PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL, WHICH ADDRESSES THE CURRENT AND PROJECTED NEEDS FOR QUALIFIED PERSONNEL; AND THE COORDINATION AND FACILITATION OF EFFORTS BETWEEN THE VR AGENCY AND INSTITUTIONS OF HIGHER EDUCATION AND PROFESSIONAL ASSOCIATIONS TO RECRUIT, PREPARE, AND RETAIN PERSONNEL WHO ARE QUALIFIED, INCLUDING PERSONNEL FROM MINORITY BACKGROUNDS AND PERSONNEL WHO ARE INDIVIDUALS WITH DISABILITIES.**

DBVI recruits qualified personnel through The University of Southern Maine, Assumption College, University of Massachusetts, and Springfield College who have received a master’s degree in Rehabilitation Counseling. These graduates meet the highest standard of education for this field. DBVI also recruits qualified personnel in related fields such as Social Work, Special Education, School Guidance and Mental Health Counseling from other New England colleges. These graduates are considered for counseling vacancies if they are willing to complete the four core rehabilitation courses. DBVI recruits professionals with expertise in vocational rehabilitation and knowledge of visual diagnoses and the implications of visual disability.

DBVI advertises openings through the State recruitment system and through local newspapers, college placement services, and on-line job posting platforms. State personnel policies require DBVI to consider qualified applicants on the Reduction in Force list before other applicants. The state of Vermont is an equal opportunity employer and there is an emphasis on recruiting and hiring individuals with disabilities and minority backgrounds to ensure a diverse staff.

Rehabilitation Associates and Associate Counselors are recruited with a strong preference given to those with bachelor’s degrees and a commitment to blind services. Rehabilitation Associates or Associate Counselors with a bachelor’s degree are encouraged to take the required four CSPD master’s level courses and/or pursue master’s degrees in preparation for retention and promotion. DBVI supports staff members who want to obtain advanced degrees or certifications through flexible work schedules and approved time off.

New staff participate in comprehensive orientation and training that covers information appropriate to serving individuals who have vision loss as well as policy and procedure. Training addresses the implications of vision loss and services such as orientation and mobility, vision rehabilitation, and low vision services. In addition, training and consultation occurs with our rehabilitation technology consultant on an ongoing basis.



DBVI ensures a high standard of qualified personnel with training directed toward an expertise for working with people with visual impairment. DBVI supports staff professional development and provides opportunities for job advancement through a career ladder within the division.

DBVI consistently receives high ratings as a great place to work in Vermont, has professional development opportunities, and offers comprehensive benefit plans that help with the recruitment and retention of qualified employees.

C. DESCRIPTION OF STAFF DEVELOPMENT POLICIES, PROCEDURES, AND ACTIVITIES THAT ENSURE ALL PERSONNEL EMPLOYED BY THE VR AGENCY RECEIVE APPROPRIATE AND ADEQUATE TRAINING AND CONTINUING EDUCATION FOR PROFESSIONALS AND PARAPROFESSIONALS:

I. PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

II. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO VR AGENCY PROFESSIONALS AND PARAPROFESSIONALS AND FOR PROVIDING TRAINING REGARDING THE AMENDMENTS TO THE REHABILITATION ACT MADE BY THE WORKFORCE INNOVATION AND OPPORTUNITY ACT.

i. Staff development opportunities are provided regularly throughout the year to ensure staff receive appropriate and adequate training in assessment, vocational counseling, job placement and rehabilitation technology in relation to visual impairment. DBVI's mission is 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".

Training for counselors focuses on the essentials of a comprehensive vocational assessment through webinars and in-person training. Staff are trained in the administration and interpretation of vocational assessments, both traditional and online. DBVI staff are trained in the Virtual Job Shadow, an interactive career exploration and career planning platform. Skillful interviewing also serves as a form of assessment. DBVI staff receive introductory and advanced training in Motivational Interviewing.

Introductory and advanced Motivational Interviewing training is offered to DBVI staff through DVR. Motivational Interviewing is used by many vocational rehabilitation agencies to effectively engage consumers. It is a person-centered approach with a focus on client choice, self-efficacy, and autonomy. Staff also participate in webinars, seminars, and workshops that provide knowledge and skill development in other vocational counseling approaches.

Staff development related to job placement is provided through various modalities. DBVI staff are actively involved with the State of Vermont regional workforce partner coalitions, a collaboration of Agency of Human Services funded employment programs. These coalitions promote cooperative employer relationships and meet regularly to provide information on job placement and vocational training opportunities for consumers. DBVI staff have access to regional DVR/DBVI funded Business Account Managers that provide knowledge of the local

labor market and who connect counselors and clients directly to employers for progressive employment opportunities. DBVI maintains relationships with local, regional and national organizations that provide training and employment for the blind and visually impaired (i.e. NSITE, Accessible Web). These organizations provide staff training on an ongoing basis.

DBVI staff receive annual training on current and emerging technologies for the blind and visually impaired through the DBVI Assistive Technology Consultant, VABVI staff, technology providers, and at the annual technology fair.

Annual training is provided by VABVI's adult services coordinator and instructor at UMASS Boston to learn about vision diagnoses and how they impact individuals, to increase awareness of functional limitations, and to identify accommodations to enhance visual function.

Every year each DBVI employee meets with the division director to discuss their Individual Development Plan (IDP). Meetings focus on how each employee can contribute to DBVI's mission, 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 receives 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 and are encouraged and supported to participate in continued education and training. Increased knowledge and responsibilities can lead to salary increases through step grades as determined by the Director and Department of Human Resources.

DBVI continues to expand vocational services for transition aged students and young adults. DBVI partners with the DVR Transition Program Director; VABVI Teachers of the Visually Impaired; DOL Youth Program Manager; and the AOE Program Coordinator to learn about services that support youth vocational development. DBVI staff provide training on adaptive skill instruction, orientation and mobility, vision rehabilitation and low vision services to agency partners. Collaborative initiatives are developed to provide the Pre-ETS core vocational services for students.

DBVI staff help to create and participate in the annual Statewide Interagency Core Team Event. Counselors are active members of regional Core transition teams and attend meetings and events to network with area transition providers and learn about their services. DBVI counselors are active in attending and providing vision rehabilitation information at IEP team meetings for students ages 14-21.

DBVI has greatly enhanced services for transition age consumers through development of the LEAP program. The program involves DBVI (provider of consumers, funding source), Vermont Youth Conservation Corps (infrastructure, staff), Resource (jobs, staff), Linking Learning to Life (follow-up, e-mentoring), VABVI (independent living and O&M trainings, transition staff) and the Gibney Family Foundation (funding). The LEAP summer residential program provides youth with work-based learning opportunities, employment, community service and independent living skill development in an urban setting. The LEAP program also offers in-person and virtual programming throughout the academic year to provide youth with continued vocational and independent living skill development.

The annual Great Expectations, Voices and Choices for the Future event is a collaborative effort by consumers, DBVI, VABVI, and VABIR. The purpose of this event is to increase employment

and job seeking skills, promote positive mentoring, provide networking opportunities, develop self-advocacy and self-reliance, and obtain feedback from clients to improve services. Great Expectations is theme based and consumer driven. The 2022 event was “Reconnecting to the World of Work and Each Other”.

DBVI allows for flexible work schedules, provides training assistance, supports state, regional, national, and online learning opportunities for staff to acquire the knowledge necessary to maintain professional standards. DBVI disseminates information on training opportunities, conferences, professional journals, and online resources. DBVI partners with the DVR Staff Development Training Coordinator to ensure inclusion in professional development opportunities offered within the State of Vermont Learning Management System (SOV LINC).

ii. DBVI staff regularly participate in training and review current research and publications through the National Research and Training Center on Blindness and Low Vision (NRTC) through Mississippi State University.

DBVI uses the C3 management model developed by Robin Lawton. This model supports a strong belief and process for a “Customer Centered Culture”. This method helps DBVI to identify the "voice of the customer". DBVI continues to use the process of assessing customer satisfaction and organizational performance with the knowledge obtained through extensive training and consultation from Robin Lawton. DBVI has incorporated this model of management into service delivery and organizational process. C3 training has been provided to the SRC, VABVI and DBVI staff.

The main dimensions of the model: 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 outcomes first, processes last, satisfy strategic objectives as well as operations, improve product knowledge. 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. C3 provides a method to measure successful outcomes based on the "voice of the customer".

In 2023 DBVI conducted town meetings statewide using C3 to allow a process for hearing the voice of the customer. DBVI collected and analyzed information that will be used in the development of DBVI’s strategic planning and service delivery. C3 training and consultation with Robin Lawton have provided staff with the tools and methodology to improve customer satisfaction and provide a higher level of service.

Using strategies from C3, DBVI created “Your Guide to Employment Services”. The guide is given to consumers during the initial interview and contains customer friendly language that explains who we are, our process, includes client success stories and describes the types of services that a person can expect from participating in the employment program. The guide provides information to increase communication and clarity by using common language. DBVI uses input from 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 also uses the Franklin Covey management system. “The 7 Habits of Highly Effective People” has been incorporated into the DBVI team culture to enhance effectiveness, responsibility, personal growth, and vision. The team approach uses a win-win philosophy, which helps to increase understanding and communication.

Using this both “The 7 Habits of Effective People” and the “Customer Centered Culture” management systems have resulted in teams that are effective in analyzing, improving, and providing services for people who are visually impaired.

The DBVI Division Director meets annually with the four regional teams throughout the state and assistive technology teams to discuss and review DBVI’s mission and vision, annual goals, and accomplishments.

**STAFF INDIVIDUAL PROFESSIONAL DEVELOPMENT:**

**Agency and Division committees:** AWARE Help Desk; AWARE Governance Team Committee; Connections Team Committee; DAIL Merit Committee.

**State committees:** State Rehabilitation Council; Governor’s Committee of Employment for People with Disabilities (GCEPD); Youth Advocacy Council Steering Committee; Interagency Core Team planning committee; Vermont Coalition of Disability Rights, Pathways to Partnership Planning Committee (RSA federal grant).

**Collaboratives:** Rural Youth Apprenticeship Development Advisory Council; Institute for Community Inclusion UMASS, Learning Collaborative; Rural Youth Apprenticeship Development (RYAD) Learning Collaborative; Customer Satisfaction Workgroup; DAIL Core Competency Pilot.

**Trainings:** Vermont Agency of Human Services Leadership Academy; HIPPA; Diversity; Ethics; Records and Information Management; Civility and Unconscious Bias; Preventing and Addressing Sexual Harassment in the Workplace; Suicide and Vision Loss Training; Understanding ADA; AOE, Assistive Technology training; Blindness and Mental Health Webinar; Pre-ETs Blindness Community of Practice webinar; Communication and Productivity Training; Creating Accessible Documents; DocuSign training.

**Conferences:** NEAER Conference; Statewide Interagency Core Team Supported Employment Summit; National Council of State Agencies for the Blind (NCSAB); Youth Advocacy Summit; National Symposium on Rehabilitation Counseling; CAP Training: Diverse Teams – Riding the Roller Coaster of Difference; Performance Evaluation Quality Assurance (PEQA) Conference.

3. DESCRIPTION OF VR AGENCY POLICIES AND PROCEDURES FOR THE ESTABLISHMENT AND MAINTENANCE OF PERSONNEL STANDARDS CONSISTENT WITH SECTION 101(A)(7)(B) TO ENSURE THAT VR AGENCY PROFESSIONAL AND PARAPROFESSIONAL PERSONNEL ARE ADEQUATELY TRAINED AND PREPARED, INCLUDING—

- A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.

A. DBVI follows the same standard used by the Division of Vocational Rehabilitation (DVR) 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 the highest priority to counselors with a master's degree in rehabilitation counseling and have received certification as a rehabilitation counselor (CRC).

The second level of priority is to hire counselors with master's degrees in counseling or related fields and are required to take the four core rehabilitation courses to comply with the CSPD requirements.

The third level priority is for DBVI to hire counselors with bachelor's degrees and support their graduate degree training through the RSA training grant.

Though not required by the Division or RSA, counselors are supported to become Certified Rehabilitation Counselors (CRC).

Presently 100% of DBVI Rehabilitation Counselors meet the CSPD standard.

All new employees are required to attend orientation and DBVI service training provided by staff that covers policy and procedures, the vocational rehabilitation process, effective case management, and all other aspects of vocational rehabilitation services. The Vermont Association for the Blind and Visually Impaired (VABVI) staff provides training on vision rehabilitation and orientation and mobility. In addition, new staff are scheduled to meet with the rehabilitation technology specialist to learn about adaptive technology and how it can enhance job opportunities for consumers. They also meet with professionals from VABIR (Vermont Association of Business Rehabilitation and Industry) to learn about job development and placement services.

B. DBVI ensures that personnel have a 21st century understanding of the evolving labor force and the needs of individuals with visual impairment through 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 training with DOL, DVR and the AOE is designed to address the needs of adults and students with vision impairment.

DBVI staff have completed training on Pathways to Promising Careers. DBVI collaborates with the DOL's Labor Planning and Youth Employment program managers and has access to resources of the DOL's 12 regional job centers.

Training is arranged annually for staff to learn about the evolving labor market to assist clients with visual disabilities in their career development. DBVI actively partners with DOL to learn

about apprenticeship programs and on-the-job training opportunities for clients to enter higher wage occupations.

DBVI works closely with the Vermont Association of Business Industry and Rehabilitation (VABIR) to learn about and connect with local employers and progressive employment opportunities.

Counselors maintain knowledge of local and regional vocational training and post-secondary educational opportunities that provide training for clients in high demand, high wage, and high growth careers.

#### 4. METHOD(S) THE VR AGENCY USES TO ENSURE THAT PERSONNEL ARE ABLE TO COMMUNICATE IN APPROPRIATE MODES OF COMMUNICATION WITH OR IN THE NATIVE LANGUAGE OF APPLICANTS OR ELIGIBLE INDIVIDUALS WHO HAVE LIMITED ENGLISH SPEAKING ABILITY.

The Division for the Blind operates under the State of Vermont Agency of Human Services. The Agency of Human Services has a Limited English Proficiency (LEP) policy that provides services to individuals who have limited English speaking ability. This policy applies to all Agency Departments, offices, and employees. The LEP policy provides individuals with language assistance as may be needed to ensure meaningful access to our programs. Departments ensure people seeking services understand which services and benefits are available and how they may access them. The LEP policy information provides resources and links dealing with written, face-to-face and over the phone communication with individuals for whom English is not the primary language. DBVI is able to use an agency contract for phone and written translation of almost any language in the world. DBVI also makes use of VANCRO, a resource to obtain interpreters of ASL for those consumers who are deaf or DeafBlind. For individuals who have dual sensory loss of vision and hearing, Vermont is piloting a program to provide Support Service Providers (SSP) to assist people to access the community and get information in their preferred communication style.

#### 5. AS APPROPRIATE, DESCRIBE THE PROCEDURES AND ACTIVITIES TO COORDINATE THE DESIGNATED STATE UNIT'S COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT WITH PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT.

DBVI works in partnership with the Vermont Agency of Education (AOE), Division of Vocational Rehabilitation (DVR), and the Vermont Department of Labor (DOL). The development of the Combined State Plan ensures compliance with the Workforce Innovation Opportunity Act (WIOA). The plan ensures students with disabilities between the ages of 14-21 receive comprehensive and unduplicated services in the five core Pre-Employment Transition services in job exploration, work-based learning experiences, workplace readiness training, instruction in self-advocacy and planning for post-secondary education or training.

DBVI is a partner on the Regional Core Transition teams in the State of Vermont. DBVI counselors work closely with DVR Youth Transition Counselors, Teachers of the Visually Impaired, VABIR Employment Consultants, DOL Youth Employment Specialists, Secondary school guidance counselors and case managers to ensure that students on IEPs are receiving Pre-Employment Transition Services and participating in activities as required in WIOA.

DBVI provides funding for student participation in the LEAP summer and year-round programming. Students who are visually impaired and at risk can work with counselors through Vermont Jobs Program. Students and their families can also receive advocacy and education through the Vermont Family Network and Vermont Center for Independent Living (VCIL).

#### J. COORDINATION WITH EDUCATION OFFICIALS.

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

##### 1. DESCRIBE PLANS, POLICIES, AND PROCEDURES FOR COORDINATION BETWEEN THE DESIGNATED STATE AGENCY AND EDUCATION OFFICIALS RESPONSIBLE FOR THE PUBLIC EDUCATION OF STUDENTS WITH DISABILITIES, THAT ARE DESIGNED TO FACILITATE THE TRANSITION OF THE STUDENTS WITH DISABILITIES FROM THE RECEIPT OF EDUCATIONAL SERVICES IN SCHOOL TO THE RECEIPT OF VOCATIONAL REHABILITATION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES.

The 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. DBVI created a partnership called the Connections Team in 2008. 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 DVR to sponsor an annual conference that brings all of the regional core teams together.

DBVI policy required and IPE to be developed no later than 30-days after eligibility and before a student graduates. The provision of pre-ETS services can begin and age 14 and until a student reaches their 22<sup>nd</sup> birthday.

2. DESCRIBE THE CURRENT STATUS AND SCOPE OF THE FORMAL INTERAGENCY AGREEMENT BETWEEN THE VR AGENCY AND THE STATE EDUCATIONAL AGENCY. CONSISTENT WITH THE REQUIREMENTS OF THE FORMAL INTERAGENCY AGREEMENT PURSUANT TO 34 C.F.R. § 361.22(B), PROVIDE, AT A MINIMUM, THE FOLLOWING INFORMATION ABOUT THE AGREEMENT:

A. CONSULTATION AND TECHNICAL ASSISTANCE, WHICH MAY BE PROVIDED USING ALTERNATIVE MEANS FOR MEETING PARTICIPATION (SUCH AS VIDEO CONFERENCES AND CONFERENCE CALLS), TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES AND OTHER VOCATIONAL REHABILITATION SERVICES;

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY PERSONNEL FOR STUDENTS WITH DISABILITIES THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS (IEPS) UNDER SECTION 614(D) OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT;

C. THE ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES;

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES. OUTREACH TO THESE STUDENTS SHOULD OCCUR AS EARLY AS POSSIBLE DURING THE TRANSITION PLANNING PROCESS AND MUST INCLUDE, AT A MINIMUM, A DESCRIPTION OF THE PURPOSE OF THE VOCATIONAL REHABILITATION PROGRAM, ELIGIBILITY REQUIREMENTS, APPLICATION PROCEDURES, AND SCOPE OF SERVICES THAT MAY BE PROVIDED TO ELIGIBLE INDIVIDUALS;

E. COORDINATION NECESSARY TO SATISFY DOCUMENTATION REQUIREMENTS SET FORTH IN 34 C.F.R. PART 397 REGARDING STUDENTS AND YOUTH WITH DISABILITIES WHO ARE SEEKING SUBMINIMUM WAGE EMPLOYMENT; AND

F. ASSURANCE THAT, IN ACCORDANCE WITH 34 C.F.R. § 397.31, NEITHER THE SEA NOR THE LOCAL EDUCATIONAL AGENCY WILL ENTER INTO A CONTRACT OR OTHER ARRANGEMENT WITH AN ENTITY, AS DEFINED IN 34 C.F.R. § 397.5(D), FOR THE PURPOSE OF OPERATING A PROGRAM UNDER WHICH YOUTH WITH A DISABILITY IS ENGAGED IN WORK COMPENSATED AT A SUBMINIMUM WAGE.

A. A staff member of the AOE-- Student Support Services Division meets regularly with the DBVI Director and Assistant Director. This person has responsibilities at AOE as a Postsecondary Transition Specialist for Students with Disabilities. This allows for ongoing communication about AOE initiatives which are also archived on a Technical Assistance and Professional



Development website for Transition Services at Special Education Resources for Special Educators and Administrators | Agency of Education ([vermont.gov](http://vermont.gov)). He is also a member of the DBVI State Rehabilitation Council. This website includes many webinars and documents related to Secondary Transition including:

- Writing Quality Transition IEPs:
- A Transition Guide for Postsecondary Education and Employment;
- Transition Assessment Planning; and
- Guidance for Creating Transition Goals.

To facilitate the process of consultation and technical assistance; DVR, DBVI, and AOE implemented a State Core Team for interagency planning and policy development. The State Core Team meets at least quarterly and more frequently if needed. The State Core Team includes:

- The AOE Special Education Director,
- The AOE Post-Secondary Transition Coordinator,
- The DAIL/DVR Director,
- The DAIL/DBVI Assistant Director, and
- The DAIL/DVR Transition Director

The interagency team coordinates training and technical assistance activities for LEAs related to the transition of students with disabilities from school to post-school activities including pre-employment transition services and vocational rehabilitation services. Training and technical assistance activities may include:

- Joint consultation with an individual LEA to address a specific local need.
- Co-sponsorship of local core transition teams including LEAs, DVR, DBVI and local community rehabilitation providers.
- Jointly sponsored regional and statewide trainings.
- Sponsorship and support of the annual core transition conference.
- Consultation and technical assistance that may be provided through alternative means such as webinars, conference calls and video conferences.

B. The AOE Postsecondary Transition Specialist is a member of the DBVI SRC and provides regular updates about AOE initiatives and guidance related to Transition Planning for students with disabilities. Recent discussions have focused on Indicator 13, Indicator 14, and Summary of Performance. DBVI Counselors participate on IEP teams to enhance the quality of the IEPs. They also are involved to make sure there is a plan for students to meet their post-school goals which are measured by Indicator 14 one year after high school graduation. DBVI counselors also help students to add important information about strengths and accommodation needs on their

Summary of Performance information that is used for post-school training and employment success.

**C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;**

The Memorandum of Agreement was signed by WIOA parties, AOE, HireAbility, DBVI on 10/9/2018 and outlines the following roles, responsibilities including financial responsibilities.

**HireAbility/DBVI Responsibilities**

HireAbility and DBVI are the Designated State Units for the public vocational rehabilitation program in the State of Vermont. In this role HireAbility and DBVI will:

- Provide Local Education Agencies (LEA) with access to Pre-Employment Transition required services for potentially eligible students:
- Work-based learning experiences which may include in-school or after school opportunities, or experiences outside the traditional school setting
- Job exploration counseling
- Workplace readiness training to develop social skills and independent living
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education
- Self-advocacy training
- Provide vocational rehabilitation and school-to-work transition services for youth

determined eligible for HireAbility or DBVI services with an approved Individual Plan for Employment (IPE), including but not limited to:

- Vocational assessment
- Counseling and consultation around the development of the Individual Plan for Employment (IPE) that is coordinated with the IEP or 504 plan
- Vocational counseling and guidance
- Job placement services
- Other paid services that are part of an approved IPE

**Financial Responsibility**

**HireAbility/DBVI Responsibility**

To the extent funds are available, HireAbility/DBVI are responsible for paying for Pre-Employment Transition Services for potentially eligible students. In addition, and to the extent funds are available, HireAbility/DBVI are responsible for paying for vocational rehabilitation

and school-to-work transition services for students and youth determined eligible for HireAbility or DBVI services with an approved Individual Plan for Employment (IPE).

#### LEA Responsibility

LEAs are responsible for paying for any transition services that are considered 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:

- The Purpose of the Service - Is the purpose of the service primarily related to an educational outcome or an employment outcome?
- 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 HireAbility or DBVI.

#### Eligibility

Is the student with a disability eligible for transition services under IDEA?

Because the definition of “student with a disability” for the HireAbility and DBVI programs includes an individual with a disability for the purposes of Section 504 of the Rehabilitation Act, it is a broader definition that it is under IDEA. HireAbility 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 special education or related services necessary for providing a free appropriate public education to students with disabilities.

Since Vermont does not permit sub-minimum wage employment there was no need to address 511 in this agreement.

#### D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

The HireAbility Transition Counselors and DBVI counselors will maintain contact with school personnel in each LEA to ensure early identification of students who are in special education or are either receiving or eligible for 504 services. This identification may occur as early as freshman year and includes HireAbility/DBVI involvement in IEP/Transition Team meetings and in 504 plan meetings, as requested by the school staff, student or family. DBVI counselors will also identify potentially eligible students through the Vermont Association for the Blind and

Visually Impaired educators located in LEAs statewide. As part of outreach efforts HireAbility and DBVI will provide the following at minimum:

- A description of the purpose of the HireAbility or DBVI program
- The eligibility requirements for the HireAbility or DBVI program
- The application procedures
- Participation in statewide and local youth-focused conferences
- The scope of services that may be provided

HireAbility and DBVI will provide brochures and other materials to schools to be shared with students with disabilities and their families. Additionally, local core transition teams and other partners will provide the HireAbility Transition Counselors and DBVI counselors with a forum to discuss the projected number of students who will need transition services from HireAbility and/or DBVI and how best to collaborate and support these students.

Outreach activities by HireAbility and DBVI, may include:

- Sharing the HireAbility transition outreach materials or DBVI pamphlet with Special Education staff, students, and their families.
- Conducting HireAbility and DBVI orientation sessions in the school for Special Education staff, students and their families, to explain VR eligibility and services.
- Participation in local Core Transition Teams, in which members of local agencies working with youth collaborate around best practices and share resources.
- Developing ways to identify students at risk for dropping out of school

The DBVI counselor and the TVIs in their region meet at the beginning, middle, and end of the year to discuss students on their caseload. All 52 high schools in Vermont have a TVI assigned to the school for regular visits to meet with students who are blind or visually impaired in that school. An initial evaluation and screening is available to all students who are blind or visually impaired in the state. This information is shared with DBVI counselors who follow-up with each TVI in their region to make sure that all students and families receive a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals. TVI's are partially funded by AOE.

E. Vermont does not have any subminimum wage employment.

F. Vermont does not have any subminimum wage employment.

#### K. COORDINATION WITH EMPLOYERS

In accordance with the requirements in Section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

## Current Narrative:

DBVI collaborates with General Vocational Rehabilitation in efforts to establish relationships with Vermont businesses. This 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/DBVI 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/DBVI 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/DBVI 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.

### **Caseload Driven Outreach:**

Caseload Driven outreach is defined as labor market outreach directly related to consumers on counselors' current caseloads. Business Account Managers are tasked with directing two-thirds of their activities to caseload needs.

### **IMPLICATIONS FOR DVR/DBVI CUSTOMERS**

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.

### **Transition services, including pre-employment transition services, for students and youth with disabilities.**

#### **Current Narrative:**

As noted in the prior section, the Business Account Managers are a major resource to the DBVI Counselors, 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 DBVI counselors. The local employment teams coordinate outreach to employers across DVR/DBVI programs. This coordinated approach maximizes the impact of DVR/DBVI employer outreach and reduces duplicate contacts with employers.

#### L. INTERAGENCY COOPERATION WITH OTHER AGENCIES

In accordance with the requirements in Section 101(a)(11)(C) and (K), describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

##### 1. STATE PROGRAMS (DESIGNATE LEAD AGENCY(IES) AND IMPLEMENTING ENTITY(IES)) CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

DBVI participates on the Advisory Board for the Vermont Assistive Technology Program. DBVI also collaborates with the AT Specialists to exchange information about new technology. We are informed about statewide initiatives and share expertise about blindness.

##### 2. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

The agency does not have a collaborative agreement but assists any individuals seeking agricultural careers.

##### 3. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH;

For out-of-school youth, DBVI does coordinate services with WIOA partners including AOE and Vermont Adult Basic Education. DBVI has regular meetings with these partners.

##### 4. STATE USE CONTRACTING PROGRAMS;

State of Vermont does not have a State Use procurement policy.

##### 5. STATE AGENCY RESPONSIBLE FOR ADMINISTERING THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT (42 U.S.C. 1396 ET SEQ.);

As Divisions within the Department of Disabilities, Aging and Independent Living (DAIL), DVR and DBVI have entered an Intergovernmental Agreement with the Department of Vermont Health Access (DVHA). 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 DDS.
- 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 DDS 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

##### 1. Funding of Time-Limited Supported Employment Services

Except for youth with most significant disabilities, who may also receive extended services, DAIL/DVR/DBVI funding of supported employment is time-limited for a period of not more than 24 months unless a determination is made that a longer period of time is necessary based upon the individual's needs. 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 the following services with Title I funds prior to placement on a job and with either Title I or Title VI funds following placement:

- - 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

##### 2. Funding for Extended Supports



Except for youth with (*most*) significant disabilities (*who may also receive extended services*), 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:

### **DHVA Global Commitment Funding of Employment Services**

#### 1. 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.

#### 2. 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.

#### 3. 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.

### 6. STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES;

DVR and DBVI are housed within the same department as the Developmental Disabilities Services Division (DDSD). 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 DDS are committed to implementing supported employment services through the blending and braiding of VR Title I and Title VI-B funding with DDS 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**

##### 1. Funding of Time-Limited Supported Employment Services

Except for youth with the most significant disabilities who may also receive extended services, 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

##### 2. 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.

## DDSD Responsibilities

### 1. 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.

### 2. 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.

### 7. STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES; AND

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 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 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**

#### **1. 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

#### **2. 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.

#### **3. 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**

### **1. 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.

### **2. 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.

### **3. 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.

## **8. OTHER FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS OUTSIDE THE WORKFORCE DEVELOPMENT SYSTEM.**

DBVI Counselors collaborate with the statewide network of Teachers of the Visually Impaired at the Vermont Association for the Blind and Visually Impaired (VABVI). VABVI is a non-profit organization and is funded by AOE and Local Education Agencies to provide statewide services. Each DBVI counselor meets regularly with the TVI(s) in their region to discuss students transition needs. DBVI and VABVI leadership meet monthly to discuss ways to collaborate and communicate about important issues. The VABVI adult service providers for Rehabilitation Teaching and O+M are contracted on a fee-for-service basis to provide adaptive training that is needed at Work-Based learning sites. This partnership with VABVI TVI(s), Rehabilitation Teachers, and O+M Specialists is statewide and connects all visually impaired students to DBVI Counselors to address transition and adaptive skill needs.

For out-of-school youth, DBVI does coordinate services with WIOA partners including AOE and Vermont Adult Basic Education. DBVI has regular meetings with these partners.

## **9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.**

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.

## **ASSURANCES**

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner, that

it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

**The VR agency must select the “Edit” button to review and agree to the VR State plan Assurances.**

The State Plan must include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.
3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:
3.a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.
3.b. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
3.c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.
3.d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).
3.e. as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.
3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
3.h. the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.

The State Plan must include
3.i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
3.j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
3.k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.
3.l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).
3.m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:
4.a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.
4.b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.
4.c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
4.d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
4.e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.
4.f. comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act.
4.g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
4.h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation



The State Plan must include
Act.
4.i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs.
4.j. with respect to students with disabilities, the State:
4.j.i. has developed and will implement,
4.j.i.A. strategies to address the needs identified in the assessments; and
4.j.i.B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113).
4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5. Program Administration for the Supported Employment Title VI Supplement to the State plan:
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
6. Financial Administration of the Supported Employment Program (Title VI):
6.a. The designated State agency assures that it will expend no more than 2.5 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)(H) and (I) of the Rehabilitation Act.
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to

The State Plan must include
supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.
7. Provision of Supported Employment Services:
7.a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
7.b. The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

Do you attest that these assurances will be met?

Yes

#### VOCATIONAL REHABILITATION (BLIND) CERTIFICATIONS

States must provide written and signed certifications that:

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY TITLE IV OF WIOA[1], AND ITS STATE PLAN SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT;

[1] Public Law 113-128.

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Vermont Agency of Human Services

2. IN THE EVENT THE DESIGNATED STATE AGENCY IS NOT PRIMARILY CONCERNED WITH VOCATIONAL AND OTHER REHABILITATION OF INDIVIDUALS WITH DISABILITIES, THE DESIGNATED STATE AGENCY MUST INCLUDE A DESIGNATED STATE UNIT FOR THE VR PROGRAM (SECTION 101(A)(2)(B)(II) OF THE REHABILITATION ACT). AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (DESIGNATED STATE AGENCY OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT)[2] AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[3], THE REHABILITATION ACT, 34 CFR 361.13(B) AND (C), AND ALL APPLICABLE REGULATIONS[4], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE TO STATES UNDER SECTION 111(A)

OF THE REHABILITATION ACT ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

ENTER THE NAME OF DESIGNATED STATE AGENCY

Vermont Agency of Human Services, Division for the Blind and Visually Impaired

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY, OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT, AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[5], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[6], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER TITLE VI ARE USED SOLELY FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES AND THE ADMINISTRATION OF THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

4. THE DESIGNATED STATE UNIT OR, IF NOT APPLICABLE, THE DESIGNATED STATE AGENCY HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE VR PROGRAM IN ACCORDANCE WITH 34 CFR 361.13(B) AND (C);

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE

UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Jenney Samuelson, Secretary VT Agency of Human Services

8. THE (ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND THE SUPPLEMENT FOR SUPPORTED EMPLOYMENT SERVICES;

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Secretary VT Agency of Human Services

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.

[1] PUBLIC LAW 113-128. [2] ALL REFERENCES IN THIS PLAN TO "DESIGNATED STATE AGENCY" OR TO "THE STATE AGENCY" RELATE TO THE AGENCY IDENTIFIED IN THIS PARAGRAPH. [3] NO FUNDS UNDER TITLE I OF THE REHABILITATION ACT MAY BE AWARDED WITHOUT AN APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN IN ACCORDANCE WITH SECTION 101(A) OF THE REHABILITATION ACT. [4] APPLICABLE REGULATIONS, IN PART, INCLUDE THE EDUCATION DEPARTMENT GENERAL ADMINISTRATIVE REGULATIONS (EDGAR) IN 34 CFR PARTS 76, 77, 79, 81, AND 82; 2 CFR PART 200 AS ADOPTED BY 2 CFR PART 3474; AND THE STATE VR SERVICES PROGRAM REGULATIONS AT 34 C.F.R. PART 361. [5] NO FUNDS UNDER TITLE VI OF THE REHABILITATION ACT MAY BE AWARDED WITHOUT AN APPROVED SUPPORTED EMPLOYMENT SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN IN ACCORDANCE WITH SECTION 606(A) OF THE REHABILITATION ACT. [6] APPLICABLE REGULATIONS, IN PART, INCLUDE THE CITATIONS IN FOOTNOTE 4, AS WELL AS SUPPORTED EMPLOYMENT PROGRAM REGULATIONS AT 34 C.F.R. PART 363.

[1] Public Law 113-128.

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

CERTIFICATION SIGNATURE

**To review and complete the Certification section of the VR portion of the State plan, please select the “Edit” button.**

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Signatory information	Enter Signatory information in this column
<b>Name of Signatory</b>	Jenney Samuelson
<b>Title of Signatory</b>	Secretary VT Agency Human Services
<b>Date Signed</b>	February 20, 2024

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan’s approval (section 116(b)(3)(A)(iv) of WIOA).

**Effectiveness in Serving Employers**

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to

report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	56.5%	56.5%	57.0%	57.0%
Employment (Fourth Quarter After Exit)	55.5%	55.5%	56.0%	56.0%
Median Earnings (Second Quarter After Exit)	\$6,500	\$6,500	\$6,600	\$6,600
Credential Attainment Rate	53.0%	53.4%	54.0%	54.0%
Measurable Skill Gains	55.0%	57.0%	55.0%	57.5%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - VOCATIONAL  
REHABILITATION

**EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES**

OMB Control Number 1894-0005 Expiration 02/28/2026

**Section 427 of the General Education Provisions Act (GEPA)** (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

**GEPA Section 427 Form Instructions for State Applicants**

**State applicants must respond to the following four questions:**

1. Describe how your entity’s existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

***Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.***

*GEPA 427 - Form Instructions for Application Package*

***State applicants must respond to four questions.***

***The first of four questions is:***

*Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.*

DBVI's mission promotes inclusivity and provides equal opportunities for all individuals who are blind or visually impaired, regardless of their background or circumstances. DBVI's policies emphasize the importance of equitable access to services. DBVI is committed to removing barriers that hinder participation and ensuring that all individuals have the support they need to succeed in the DBVI vocational rehabilitation program.

DBVI is a division of the Vermont Agency of Human Services, AHS policies include:

- Nondiscrimination and grievance
- Accessible and inclusive communication
- Serving individuals with limited English proficiency
- Trauma informed services

DBVI also participates in the JEDI Committee. The Committee's Mission is to pursue justice, equity, diversity, and inclusion (JEDI) for the people we serve to build a better Vermont.

The JEDI Committee serves as a network of staff across Divisions to help build consistency in the Equity practices we employ. This group is sponsored by Senior Leadership, with support and facilitation by an elected Chair and Vice-Chair.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE  
EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER  
BENEFICIARIES?

***Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.***

GEPA 427 - Form Instructions for Application Package

***State applicants must respond to four questions.***

***The second of four questions is:***

*Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?*

Potential barriers to equitable access and participation may include transportation problems, disabilities, language barriers, or lack of awareness about available resources. Geographical limitations may also be a challenge for some individuals in fully engaging with the program.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH  
BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR  
ACTIVITY?



**Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.**

*GEPA 427 - Form Instructions for Application Package*

**State applicants must respond to four questions.**

**The third of four questions is:**

*Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?*

To address these barriers, DBVI will implement some new strategies. This includes offering accommodations for individuals who are blind or visually impaired to have options for participating virtually, providing language support services, conducting outreach and awareness events to reach underserved communities, and establishing partnerships with local organizations to facilitate access to DBVI programs.

**4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?**

**Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.**

*GEPA 427 - Form Instructions for Application Package*

**State applicants must respond to four questions.**

**The final of four questions is:**

*What is your timeline, including targeted milestones, for addressing these identified barriers?*

The DBVI timeline for addressing these identified barriers is as follows:

- PY 2024: Conduct a review of identified barriers from previous customer satisfaction surveys.
- PY 2024: Begin implementation of strategies, including outreach efforts.
- PY 2025: Monitor progress and make adjustments as needed based on feedback and tri-annual customer satisfaction survey.
- PY 2025: Evaluate the effectiveness of interventions and make recommendations for sustaining equitable access and participation long term.

**GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - SUPPORTED EMPLOYMENT EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES**

**Section 427 of the General Education Provisions Act (GEPA)** (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

### **GEPA Section 427 Form Instructions for State Applicants**

#### **State applicants must respond to the following four questions:**

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
4. What is your timeline, including targeted milestones, for addressing these identified barriers?

- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
- Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
- Applicants are not required to have mission statements or policies that align with equity to apply.
- Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
- Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

**Section 427 of the General Education Provisions Act (GEPA)** (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

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The JEDI Committee serves as a network of staff across Divisions to help build consistency in the Equity practices we employ. This group is sponsored by Senior Leadership, with support and facilitation by an elected Chair and Vice-Chair.

DBVI remains committed to serving individuals with the most severe disabilities including those requiring supported employment through strong partnerships with HireAbility, Developmental Service agencies, mental health agencies, and organizations serving the blind and visually impaired. DBVI works with school teams and teachers for the visually impaired to ensure a smooth transition to competitive integrated employment include supported employment for individuals with the most significant needs.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

**Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.**

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3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

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4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

**Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.**

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- PY 2024: Conduct a review of identified barriers from previous customer satisfaction surveys.
- PY 2024: Begin implementation of strategies, including outreach efforts.
- PY 2025: Monitor progress and make adjustments as needed based on feedback and tri-annual customer satisfaction survey.
- PY 2025: Evaluate the effectiveness of interventions and make recommendations for sustaining equitable access and participation long term.

## VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyser Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program— and also submit relevant information for any of the eleven partner programs it elects to include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. <sup>24</sup> If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

[24] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

### TRADE ADJUSTMENT ASSISTANCE (TAA)

There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Has the state incorporated TAA into the sections indicated above?

Yes

## JOB FOR VETERANS' STATE GRANTS

(OMB Control Number: 1293-0017)

### **Components of the Jobs for Veterans State Grants State Plan**

Jobs for Veterans State Grants (JVSG) recipients must provide a four-year state plan as a condition for the receipt of annual funding in accordance with 38 U.S.C. § 4102A(c). This plan must include responses to each of the components below.

#### **A. DESCRIBE HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING, AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG PROGRAM (I.E., VIRTUALLY AND IN-PERSON).**

Vermont is dedicated to serving all veterans throughout the state by connecting them to the education and training necessary 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. The state is also committed to increasing awareness of available veterans' services among the WIOA partners to ensure that there is "no wrong door" for a veteran seeking employment. All case managers and counselors will have a clear understanding of both available services and how to refer appropriately.

Individuals enter the workforce development system in one of two ways: by visiting a Vermont Department of Labor (VDOL) One-Stop Career Center or through the online Vermont JobLink (VJL) registration system. Regardless of the entry point, customers, whether they are veterans or a spouse of a veteran, are asked to self-identify their veteran status to ensure they can take full advantage of the available services to veterans.

On a priority of service basis, an AJC staff member determines the eligible person's purpose for registering. Once the veteran or other eligible person is identified, the AJC Staff member conducts an initial assessment using a customized intake questionnaire. By determining if the veteran or other eligible person has a significant barrier to employment (SBE), via self-identification, or if they are a member of another special priority group. If a determination is made that the client is a veteran with a SBE or meets other special criteria, they are referred to the DVOP or consolidated position (CP) for further assessment and Individualized Career Services. Those veterans determined not to possess a SBE are provided career services and training as needed by the AJCC staff on a priority of service basis.

After veteran status is determined, individuals are asked to provide more detailed information on an intake and intensive services determination form. If they respond affirmatively, they are immediately informed of their priority of service status and entitlement to priority of service. This includes all priority of service employment, training and placement services and applicable eligibility requirements for those programs and services. These training services may be provided through the referral from the DVOP to apprenticeship opportunities, on-the-job training, VR&E program WIOA programs and other job placement services. That may include a referral to the LVER, CP or business outreach member once the client is job placement ready.

If it is determined the individual does not have a significant barrier to employment, 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

One-Stop Career Center staff connect them immediately with a Disabled Veteran's Outreach Program (DVOP) and CP from the Jobs for Veterans State Grants program (JVSG). If a DVOP or CP is unavailable to see the individual immediately, then non-JVSG staff may provide immediate services if applicable, until the DVOP or CP is available and able to provide services.

The DVOP or consolidated position (CP) may serve eligible veterans and spouses who attest to experiencing a significant barrier as defined in VETS most recent guidance (VPL-03-14 Change 2) provide individual career services and facilitate placements to meet the employment needs of Vermont's eligible veterans and eligible persons. The DVOP/CP helps to identify appropriate job opportunities for the Veteran's employment goals and assist the veteran in developing a cover letter and a resume that target those jobs. As part of the orientation, the veteran will discuss their work search strategies, complete an individual employment plan (IEP) and establish the next appropriate step in their career plan. Vermont has two full-time and one half-time DVOP specialists who serve Vermont's eligible Veterans and eligible persons. We plan to have a DVOP (Rutland, VT) become a consolidated position within the first year of the plan.

All DVOP, CP and LVER staff are trained on all services and placement strategies available to veterans, through the National Veteran Training Institute, national and state conferences and training sessions. DVOP and CP provides information-sharing and capacity building for the AJC. The LVER staff offers training to One-Stop partners who can be referral sources when a veteran applies for services through their programs. Currently, veterans working with a vocational rehabilitation counselor are referred to the DVOP and CP for additional services and support. LVERs and CP also working with vocational rehabilitation's employment consultants, explore potential employers on behalf of the veteran, to leverage contacts of both. By offering trainings on DVOP, CP and LVER services to our WIOA partners, we hope to increase both visibility of the program and referrals for services from our veteran services staff members through the One-Stop system.

**B. LIST THE POPULATIONS TO BE SERVED BY DISABLED VETERANS' OUTREACH PROGRAM (DVOP) AND CONSOLIDATED POSITION STAFF, INCLUDING THE ELIGIBILITY CRITERIA FOR REFERRAL FOR DVOP SERVICES.**

In accordance with the Jobs for Veterans Act and VPL 03-14 Change 2, the responsibility of serving veterans defined as most in need falls primarily on grant funded DVOP/Consolidated staff, will continue to case manage Veterans who have significant barriers to employment in accordance with VETS guidance. Under this plan, stated in VPL 03-14, VPL 03-14 Change 1 and Change 2, VPL 07-14, VPL 03-19 or most current guidance, service priority for JVSG staff will be targeted in accordance with VETS policies. One-stop partner programs will be included in service delivery planning and referrals as appropriate. DVOPs will provide individual career services and in-depth case management to an eligible veteran as defined in 38 U.S.C. 4101(4) and 4211(4) or eligible spouse as defined in 38 U.S.C. 4101(5) who is determined to have a SBE or within the additional populations shown below:

- Veterans with service-connected disabilities,
- Veterans between the ages of 18-24,
- Veterans who recently separated military service with unemployment of 27 or more weeks in the last 12 months,

- Homeless veterans,
- Veterans who have been subject to any stage of the criminal justice process,
- Veterans lacking a high school diploma or equivalent certificate,
- Low-income veterans (as defined by WIOA Section 3 (36)),
- Transitioning service members in need of individualized services, or involuntarily separated as outlined in VPL 07-14
- Wounded warriors in military treatment facilities and their family caregivers,
- Vietnam era veteran

C. DESCRIBE THE ROLES AND RESPONSIBILITIES ASSIGNED TO DISABLED VETERANS' OUTREACH PROGRAM (DVOP) SPECIALISTS, LOCAL VETERANS' EMPLOYMENT REPRESENTATIVE (LVER) STAFF, AND CONSOLIDATED DVOP/LVER POSITIONS BY THE STATE. THESE MUST BE CONSISTENT WITH 38 U.S.C. 4103A AND 4104.

The role of the DVOP and consolidated position (CP) is to serve veterans deemed most likely to face significant barriers to employment and in the most in need of individualized career services. The role of the LVER and CP specialist is to explore employment opportunities for veterans. For veterans who do not face significant employment barriers, labor exchange staff provide basic career services that non-veteran customers might access under Wagner-Peyser. When appropriate, DVOP, CP and labor exchange staff provide these services to a veteran simultaneously (e.g. labor exchange staff might be offering a resume building workshop that a veteran would be invited to attend). These are services typically sought by more "job ready" individuals.

D. DEMONSTRATE THE MANNER IN WHICH DVOP, LVER AND CONSOLIDATED DVOP/LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEMS OR AMERICAN JOB CENTER (AJC). THIS DEMONSTRATION SHOULD SHOW ACTIVE ENGAGEMENT BETWEEN JVSG AND OTHER AJC STAFF, SUCH AS THROUGH PARTICIPATION IN STAFF MEETINGS AND CROSS-TRAINING OPPORTUNITIES.

Vermont's One-Stop Centers are seamlessly integrated with all WIOA Title I, Wagner-Peyser, JVSG staff and key workforce partner services. Integrated also means that initial services provided to eligible veterans are occasionally provided by staff other than DVOP or Consolidated positions (CP). DVOP CP and LVER staff working in One-Stop Career Resource Centers and are part of the local workforce team. They have a regular opportunity to highlight veterans' services, both internally and with other WIOA partners. DVOP, CP and LVER staff are experts in employment of veterans and are regularly consulted by other staff with questions about the best approach to take in a case.

The regional manager at the AJC incorporates the JVSG staff within the AJC by conducting weekly staff meetings to ensure collaboration, information sharing among programs within the AJC to ensure integration is seamless and transparent to the client. The DVOP and CP work with all the staff within the AJC to get the client job ready. The LVER, CP and business outreach member passes information from the local business partners to the client and staff to facilitate/improve employment opportunities for the client.



The initial assessment identifies the “job readiness” of the veteran if they meet eligibility criteria for DVOP services, standard career services are provided on a priority basis by local One-Stop Career Center staff. If individualized case services are appropriate, an IEP is developed, and the veteran is assisted directly by the DVOP/CP or referred to supportive services as appropriate. In all cases, staff ensure that covered persons are aware of their entitlement to priority of service, all employment, training and placement services available under priority of service and applicable eligibility requirements for those programs or services.

As an example of integration, a veteran in need of additional training or education to be more employable moves through the eligibility determination and enrollment process. The veteran’s primary case manager may become a WIOA Title I funded staff member or community partner that will provide additional case management rather than a DVOP/CP specialist. This integration applies to other One-Stop partners, including Vermont’s Vocational Rehabilitation program, adult education and literacy partners, state colleges and universities, and the Senior Community Services Employment Program (SCSEP).

At the state level, and working throughout the system, key partnerships exist with the Veterans Administration (VA) hospitals, counseling centers and veteran housing coalitions. The VA is often represented at local VDOL sponsored veteran events (job fairs, information sessions).

DVOP and CP specialists conduct outreach to VA hospitals and centers regularly. VDOL provides a LVER manager as the Individualized Services Coordinator for the Veteran Readiness and Employment Program (VR & E). This individual interacts with VAs state and federal VR & E coordinators, while helping to direct DVOP specialists on what services are needed to help individual veterans referred to them. The VR & E/ISC team conducts meetings and training sessions for DVOP, CP and LVER staff and additional training on the VR & E regulations and reporting requirements.

A second key partnership exists with attendance of both JVSG and non-JVSG staff at the annual National Association of State Workforce Agencies (NASWA) Veterans Conference. This conference offers the opportunity for state staff to learn about innovations in services to veterans, new training, and employment initiatives, as well as hearing from national experts in the field of veterans’ employment. Attendees also learn how other states integrate veterans’ services and coordinate employer engagement activities with other WIOA partners.

Outreach and linkage to veterans most in need of individualized case management services is an ongoing priority. Local DVOP or CP specialists have direct contact and coordination with homeless veteran shelters (HVRP grantees) to provide direct services and training program opportunities leading to gainful employment and self-sufficiency. Included in these outreach efforts are broad based marketing and promotion of veteran oriented events, job fairs and education and training programs.

Increasing relationships with the business community is a priority for the LVER and CP staff. Working with employment consultants and job placement staff from WIOA partner agencies, LVER and CP staff ensure that their activities are not conducted in a vacuum but are rather coordinated with other employer engagement efforts within the broader workforce development context. LVER and CP staff will continue to utilize available tools such as the Work Opportunity Tax Credit (WOTC), SkillBridge, and Hilton Honors Program to support Veterans and the employers who hire them.

The LVER and CP staff highlight relocation and remote worker incentives available through state initiatives. With an aging workforce, declining birth rates and little in-migration of workers, the state is facing a critical shortage of workers in every sector. Recruitment of new workers is a priority for the state and VDOL serves as an initial point of contact for workers who are interested in relocating to Vermont. Veterans have been identified as one of the key groups to target for these efforts. VDOL staff have been working with the Transition Assistance Program (TAP) at Fort Drum, NY to attend quarterly career fairs where service members who are nearing the end of their service. Service members have the opportunity to meet with businesses and learn about training programs to help determine next steps for themselves and their families. Veteran staff often uses SkillBridge as a means to encourage these individuals transitioning service members to move to Vermont, as we know employers are very interested in hiring former service members. Increasing the number of veterans moving to Vermont is a priority for the state.

E. DESCRIBE THE STATE'S PERFORMANCE INCENTIVE AWARD PROGRAM TO ENCOURAGE INDIVIDUALS AND/OR EMPLOYMENT SERVICE OFFICES TO IMPROVE AND/OR ACHIEVE EXCELLENCE IN THE PROVISION OF SERVICES TO VETERANS, INCLUDING:

1. THE NOMINATION AND SELECTION PROCESS FOR ALL PERFORMANCE INCENTIVE AWARDS TO INDIVIDUALS AND/OR OFFICES;

**Eligibility Criteria:** Veterans Service Performance Awards will be granted to individuals and VDOL's local One-stop offices to recognize exceptional service to veterans or for specific activities or initiatives that promote successful employment of veterans. Nominations must detail the activities that meet this aim and may also descriptions of how the nominee achieved one or more of the following:

1. System improvements that result in improved services to veterans and other eligible individuals under JVSG,
2. Outstanding case management on behalf of a JVSG participant,
3. Exceptional effort expended to assist a homeless veteran, formerly incarcerated veteran, or other hard to place JVSG participant,
4. Activities led to improve performance, reduce time or cost, or promote collaboration around service to veterans,
5. Outstanding outreach or placement efforts on behalf of veterans and JVSG participants,
6. Extraordinary community relations efforts to increase the awareness of veterans' issues, or
7. Development of a program, for which the impact may not be directly measurable, (i.e. resume skills building program), targeted to support veterans.

**Overview:** Cash incentive Award Program: This award is administered in accordance with VPL 01-24, attachment 5 and VPL 03-23 or the most recent guidance from USDOL-VETS. The objective of the JVSG cash incentive award program, known as the Veterans Service Performance Incentive Award Program, is to recognize, promote and reward exceptional performance in the provision of service to veterans within the context of statutes and

regulations. The award program will create an awareness and continuous level of interest in the importance of providing intentional, high-quality outreach and services for veterans and promote an environment that engenders continuous improvement the way staff support veterans across the spectrum of service. The award system shall continue to operate as defined in the applicable State Policy and as approved by USDOL.

The state anticipates that individuals and teams will recognize the value and process of the awards program and will, as a result, develop a competitive attitude within the agency that supports esprit de corps within the team while sharpening the focus on service to other eligible persons. Incentive awards shall be expended up to and including 1 percent of the total grant amount for the fiscal year, which is set aside strictly, by the fiscal department of VDOL, for this purpose in the annual grant budget. Awards shall be determined based on a percentage of total award available for that fiscal year but shall not (in total) exceed 1% of the total available funds for a given fiscal year or the most current USDOL guidance on grant- funded incentive award amounts.

**Selection and Award Process:** The application must be completed, signed, and scanned to the Assistant Director by April 1 of each grant year. Each nomination will be screened to ensure the recipient is eligible to receive the award under state and department merit award policies. The Director of Workforce Development will convene an award review committee of no less than three members of the Department to review nominations and make award recommendations to the Director. Nominations will be scored based on information provided in response to the five questions on the nomination form and may use a scoring rubric established by the State Veterans Services Coordinator. Recommendations will be forwarded to the Director by April 17 of each grant year. The Director will consider the recommendations and submit final nominees to the Department's Meritorious Awards Committee (MAC) or the Commissioner directly, pursuant to VDOL Policy #14.

Winners will be announced in May of each grant year and all awards will be distributed by July of each year.

## 2. THE APPROXIMATE NUMBER AND VALUE OF CASH AWARDS USING THE ONE PERCENT INCENTIVE AWARD ALLOCATION;

Vermont elects to use one percent of the Jobs for Veterans State Grant (JVSG) allocation to provide cash performance awards for eligible employees and local one-stop offices. The awards program is intended to encourage and incentivize the improvement and modernization of employment, training, and placement services for veterans, and recognize eligible employees and offices for excellence in the provision of such services, or for having made demonstrable improvements in the provision of services to veterans.

The award will be administered by the VDOL Fiscal.

**Award Amounts:** The state shall request 1 percent of its annual allocation for each year's JVSG grant as performance incentive awards for eligible staff that will be paid in cash.

Individual Performance Award Amounts:

1. LVER or CP Performance Award (approximately 1/5 of the annual allocation)
2. DVOP or CP Performance Award (approximately 1/5 of the annual allocation)

3. One-Stop Staff/Partner Staff Performance Award (approximately 1/5 of the annual allocation)

**Local One-Stop Office Award Amounts:**

1. 1st Place Local Office Winner (approximately 1/5 of the annual allocation)
2. 2nd Place Local Office Winner (approximately 1/5 of the annual allocation)

**Eligible Recipients:** Award recipients must meet eligibility requirements outlined in Section 4 of the Vermont Department of Labor's Policy #14: Meritorious Awards Policy.

Veterans Service Performance Awards will be granted to individuals in each of the three following categories:

- Disabled Veterans' Outreach Program (DVOP) or Consolidated Position (.5 or 1 FTE status),
- Local Veterans' Employment Representative (LVER) or Consolidated Position (.5 or 1 FTE status), and
- Any other individual who provides employment and training services to veterans under the Workforce Innovation and Opportunity Act (WIOA), to include labor exchange staff funded by the Wagner-Peyser Act, or staff of one-stop agencies.

Two Veterans Service Performance Awards will be granted to local ne-stop offices.

**3. THE GENERAL NATURE AND APPROXIMATE VALUE OF NON-CASH PERFORMANCE INCENTIVE AWARDS TO BE CHARGED TO THE BASE ALLOCATION; AND**

The state does not allocate any non-cash incentive awards to individual employees or to the winning AJC or one-stop. All incentive award winners will receive a cash-based allocation.

**4. ANY CHALLENGES THE STATE MAY ANTICIPATE TO CARRYING OUT A PERFORMANCE INCENTIVE AWARD PROGRAM AS MANDATED BY 38 U.S.C. § 4102A(C). THIS SHOULD INCLUDE ANY STATE LAWS OR POLICIES THAT PROHIBIT SUCH AWARDS, IF APPLICABLE. DESCRIBE THE STATE'S EFFORTS IN OVERCOMING THOSE CHALLENGES.**

The State does not have any anticipated challenges in carrying out the performance incentives. The State has been providing incentive awards for several years and any possible concerns have been sorted out.

**F. LIST THE PERFORMANCE TARGETS FOR DIRECT SERVICES TO VETERANS PROVIDED BY JVSG STAFF, AS MEASURED BY PARTICIPANTS':**

- employment rate in the second quarter after exit from the program;
- employment rate in the fourth quarter after exit; and
- median earnings in the second quarter after exit.

Using the State Performance Target Tool (VPL 01-24, attachment 4) the Workforce Development staff determined that setting a goal that exceeds PY21 and meets 95% of all goals in PY22 is reasonable as noted below:

- Employment Rate 2nd Quarter After Exit - 58.5%
- Employment Rate 4th Quarter After Exit - 49%
- Median Earnings 2nd Quarter After Exit - \$8,555

The JVSG staff will continue to exceed the individual career services (ICS) rate of 90%.

## PERFORMANCE INDICATOR APPENDIX

### ALL WIOA CORE PROGRAMS

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

#### ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - ADULT PROGRAM PERFORMANCE INDICATORS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	70.0%	70.0%	71.0%	71.0%
Employment (Fourth Quarter After Exit)	61.0%	64.5%	62.0%	65.0%
Median Earnings (Second Quarter After Exit)	\$5,835	\$7750	\$5,925	\$8000
Credential Attainment Rate	66.0%	66.0%	66.5%	66.5%
Measurable Skill Gains	57.0%	57.0%	58.0%	58.0%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

#### ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - DISLOCATED PROGRAM PERFORMANCE INDICATORS

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

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

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment

Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

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

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

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

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

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

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

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



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

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

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	76.0%		76.5%	
Employment (Fourth Quarter After Exit)	70.0%		70.5%	
Median Earnings (Second Quarter After Exit)	\$9,350		\$9,357	
Credential Attainment Rate	76.0%		76.5%	
Measurable Skill Gains	63.0%		63.5%	
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

## ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - YOUTH PROGRAM PERFORMANCE INDICATORS

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

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

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

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

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

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

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

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

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

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

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

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

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	64.0%		64.5%	

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Fourth Quarter After Exit)	61.0%		61.5%	
Median Earnings (Second Quarter After Exit)	\$4,050		\$4,131	
Credential Attainment Rate	42.0%		42.5%	
Measurable Skill Gains	43.0%		44.0%	
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

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*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

#### WAGNER-PEYSER ACT - WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

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

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

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

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

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

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

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

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

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

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

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

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

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	61.0%	61.0%	61.5%	61.5%
Employment (Fourth Quarter After Exit)	54.0%	55.5%	54.5%	56.0%
Median Earnings (Second Quarter After Exit)	\$6,798	\$7,250	\$6,934	\$7,500
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

#### ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM - ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

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

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

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

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

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

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

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

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

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

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

- Credential Attainment Rate

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

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

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	44.0%	44.4%	45.0%	45.0%
Employment (Fourth Quarter After Exit)	42.0%	40.0%	43.0%	40.5%
Median Earnings (Second Quarter After Exit)	\$4,200	\$4,425	\$4,500	\$4,450
Credential Attainment Rate	42.0%	45.8%	44.0%	46.0%
Measurable Skill Gains	36.0%	36.0%	37.0%	37.0%
Effectiveness in	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>



Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Serving Employers				

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*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

#### VOCATIONAL REHABILITATION PROGRAM (COMBINED OR GENERAL) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

#### **Effectiveness in Serving Employers**

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter)	56.5%	56.5%	57.0%	57.0%

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
After Exit)				
Employment (Fourth Quarter After Exit)	55.5%	55.5%	56.0%	56.0%
Median Earnings (Second Quarter After Exit)	\$6,500	\$6,500	\$6,600	\$6,600
Credential Attainment Rate	53.0%	53.4%	54.0%	54.0%
Measurable Skill Gains	55.0%	57.0%	55.0%	57.5%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

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*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

#### VOCATIONAL REHABILITATION PROGRAM (BLIND) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the

negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan’s approval (section 116(b)(3)(A)(iv) of WIOA).

**Effectiveness in Serving Employers**

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	56.5%	56.5%	57.0%	57.0%
Employment (Fourth Quarter After Exit)	55.5%	55.5%	56.0%	56.0%
Median Earnings (Second Quarter After Exit)	\$6,500	\$6,500	\$6,600	\$6,600
Credential Attainment Rate	53.0%	53.4%	54.0%	54.0%
Measurable Skill Gains	55.0%	57.0%	55.0%	57.5%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.*

**ADDITIONAL INDICATORS OF PERFORMANCE**

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Additional Indicators of Performance
N/A

Additional Indicators of Performance
N/A
N/A
N/A
N/A

OTHER APPENDICES

N/A