Workforce Innovation and Opportunity Act (WIOA)
Rhode Island Combined State Plan
For the period of July 1, 2020 through June 30, 2024
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WIOA State Plan for the State of Rhode Island – FY2020

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 makes a number of changes to state 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, and with the employer community.

Options for Submitting a State Plan

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

- the Adult program (Title I of WIOA),
- the Dislocated Worker program (Title I),
- the Youth program (Title I),
- the Adult Education and Family Literacy Act program (Title II),
- the Wagner-Peyser Act program (Wagner-Peyser Act, as amended by title III), and
- the Vocational Rehabilitation program (Title I of the Rehabilitation Act of 1973, as amended by Title IV).
Alternatively, a State may submit a Combined State Plan that meets the requirements described in this document and outlines a four-year strategy for WIOA’s core programs plus one or more of the Combined Plan partner programs. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. If included, Combined State Plan partner programs are subject to the “common planning elements” (Sections II and III of this document) where specified, as well as the program-specific requirements for that program where such planning requirements exist separately for the program. The Combined State Plan partner programs are—

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

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

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

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

- **The Operational Planning Elements** section identifies the State’s efforts to support the State’s strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:
  o State Strategy Implementation,
  o State Operating Systems and Policies,
  o Assurances, and
  o Program-Specific Requirements for the Core Programs, and
  o Program-Specific Requirements for the Combined State Plan partner programs.

(These requirements are available in a separate supplemental document, Supplement to the Workforce and Innovation Act (WIOA) Unified and Combined State Plan Requirements. The Departments are not seeking comments on these particular requirements).

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

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

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

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

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

Combined Plan partner program(s)

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

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.) Yes

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

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

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

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

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

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

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

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

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

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

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

a. Economic, Workforce, and Workforce Development Activities Analysis

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

1. Economic and Workforce Analysis

A. Economic Analysis

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

i. Existing Demand Industry Sectors and Occupations

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

In the fall and winter of 2015–2016, the Rhode Island Commerce Corporation commissioned a comprehensive study of the Rhode Island economy and its current and projected industry demand. The Metropolitan Policy Program at Brookings worked in association with Battelle Technology Partnership Practice (now TEConomy Partners, LLC) and Monitor Deloitte to advance a new competitive strategy for the state of Rhode Island. This project’s final conclusions, entitled “Rhode Island Innovates” found that Rhode Island possesses unique assets for building an advanced economy that works for all but stands weakened by the decline of its core “advanced industries.” Given that erosion, the report asserts that five “advanced industry” and two “opportunity industry” growth areas hold out solid potential for growth in Rhode Island. These subsectors are categorized as ‘Advanced’ — including biomedical innovation, cyber and data analytics, maritime technology and manufacturing, advanced business services, and design and custom manufacturing — as well as ‘Opportunity’ — including Transportation, Distribution, and Logistics, and Arts, Education, Hospitality, and Tourism.
In follow-up to the 2015 report, in 2019 the Commerce Corporation engaged New Localism Associates, City Facilitators and Qvartz to assess the performance of the state’s advanced economy between 2016 and 2019 as well as the impact of the policies and programs enacted in as a result of the Brookings report. The Commerce Corporation also directed the team to recommend an updated economic strategy going forward. That analysis, entitled “Rhode Island Innovates 2.0” reinforced the previously identified “advanced industry” and “opportunity industry” growth areas, and also identified two additional subsectors – the blue (ocean/coastal technology) economy and wind energy- and one business function concentration - back office (administrative support functions for large firms) - that play to the state’s strengths and offer additional areas of opportunity for the Rhode Island economy.

Simultaneous to this commissioned work, the Rhode Island Department of Labor and Training’s Labor Market Information Office has begun producing more in-depth industry specific labor reports, at an increased frequency, providing more actionable data concerning existing and emerging industry and occupational demands.

The Brookings analysis, combined with the ongoing LMI data, provides a powerful and informative ‘north star’ to guide the state’s workforce network. Relevant data points from these efforts are included in the responses below.

**Existing Demand Industry Sectors and Occupations**

Analysis by the state’s Labor Market Information division provides preliminary distribution of current employment seasonally adjusted, by industry for Rhode Island for December 2019. Education and Health Services comprise the largest industry in Rhode Island, employing 110,600 individuals, accounting for 21.8% of total nonfarm employment. The second largest industry in the state is Trade, Transportation, and Utilities, employing 80,200 individuals, accounting for roughly 16% of total employment. Professional and Business Services combine to form the third largest industry sector in Rhode Island, employing 69,500 individuals, accounting for 13.7% of the state’s total employment.

<table>
<thead>
<tr>
<th>Rhode Island Establishment Employment</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Seasonally Adjusted - Dec 2019</strong></td>
<td>506.3</td>
</tr>
<tr>
<td><strong>Total Nonfarm</strong></td>
<td>444.8</td>
</tr>
<tr>
<td>Education &amp; Health Services</td>
<td>110.6</td>
</tr>
<tr>
<td>Trade, Transportation &amp; Utilities</td>
<td>80.2</td>
</tr>
<tr>
<td>Professional &amp; Business Services</td>
<td>69.5</td>
</tr>
<tr>
<td>Government</td>
<td>61.5</td>
</tr>
<tr>
<td>Leisure &amp; Hospitality</td>
<td>60.3</td>
</tr>
<tr>
<td>Manufacturing</td>
<td>39.2</td>
</tr>
<tr>
<td>Financial Activities</td>
<td>35.9</td>
</tr>
<tr>
<td>Other Services</td>
<td>23.5</td>
</tr>
<tr>
<td>Construction</td>
<td>19.2</td>
</tr>
<tr>
<td>Information</td>
<td>6.2</td>
</tr>
<tr>
<td>Mining &amp; Logging</td>
<td>0.2</td>
</tr>
</tbody>
</table>

[http://www.dlt.ri.gov/lmi/ces.htm](http://www.dlt.ri.gov/lmi/ces.htm)
Based on the most recently available information; the top ten occupations by employment in the following table account for 74% of all jobs and total 358,680 jobs in Rhode Island. Office and Administrative Support Occupations employ 15% of total state population. Food Preparation and Serving Related Occupations as well as Sales and Related Occupations as well as account for 10% and 9.5% of the state’s employment respectively.

<table>
<thead>
<tr>
<th>State Occupational Employment and Wage Estimates- Rhode Island</th>
<th>May 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office and Administrative Support Occupations</td>
<td>72,280</td>
</tr>
<tr>
<td>Food Preparation and Serving Related Occupations</td>
<td>49,510</td>
</tr>
<tr>
<td>Sales and Related Occupations</td>
<td>46,230</td>
</tr>
<tr>
<td>Education, Training, and Library Occupations</td>
<td>33,260</td>
</tr>
<tr>
<td>Healthcare Practitioners and Technical Occupinations</td>
<td>33,110</td>
</tr>
<tr>
<td>Production Occupations</td>
<td>30,140</td>
</tr>
<tr>
<td>Business and Financial Operations Occupations</td>
<td>28,320</td>
</tr>
<tr>
<td>Transportation and Material Moving Occupations</td>
<td>26,830</td>
</tr>
<tr>
<td>Management Occupations</td>
<td>20,900</td>
</tr>
<tr>
<td>Healthcare Support Occupations</td>
<td>18,100</td>
</tr>
</tbody>
</table>

https://www.bls.gov/oes/current/oes_ri.htm

*Source: Occupational Employment Statistics Program, USDOL*
ii. Emerging Demand Industry Sectors and Occupation

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

Emerging Demand Industry Sectors

The table below shows the top 10 industries with the highest annual percent change in Rhode Island for the 2016-2026 time period.

<table>
<thead>
<tr>
<th>NAICS Code</th>
<th>Industry Title</th>
<th>2016 Estimated Employment</th>
<th>2026 Projected Employment</th>
<th>Numeric Change</th>
<th>Percent Change</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>Total All Industries</strong></td>
<td>520,251</td>
<td>550,715</td>
<td>30,464</td>
<td>5.9%</td>
</tr>
<tr>
<td>72</td>
<td>Accommodation and Food Services</td>
<td>48,204</td>
<td>52,761</td>
<td>4,557</td>
<td>9.5%</td>
</tr>
<tr>
<td>62</td>
<td>Health Care and Social Assistance</td>
<td>82,389</td>
<td>86,500</td>
<td>4,111</td>
<td>5.0%</td>
</tr>
<tr>
<td>54</td>
<td>Professional, Scientific, and Technical Services</td>
<td>24,572</td>
<td>27,627</td>
<td>3,055</td>
<td>12.4%</td>
</tr>
<tr>
<td>44-45</td>
<td>Retail Trade</td>
<td>48,190</td>
<td>50,653</td>
<td>2,463</td>
<td>5.1%</td>
</tr>
<tr>
<td>56</td>
<td>Administrative &amp; Support &amp; Waste Management &amp; Remediation Services</td>
<td>27,873</td>
<td>30,301</td>
<td>2,428</td>
<td>8.7%</td>
</tr>
<tr>
<td>23</td>
<td>Construction</td>
<td>18,134</td>
<td>20,401</td>
<td>2,267</td>
<td>12.5%</td>
</tr>
<tr>
<td>31-33</td>
<td>Manufacturing</td>
<td>40,420</td>
<td>42,510</td>
<td>2,090</td>
<td>5.2%</td>
</tr>
<tr>
<td></td>
<td>Self Employed and Unpaid Family Workers, All Jobs</td>
<td>46,795</td>
<td>48,420</td>
<td>1,625</td>
<td>3.5%</td>
</tr>
<tr>
<td>52</td>
<td>Finance and Insurance</td>
<td>26,572</td>
<td>28,120</td>
<td>1,548</td>
<td>5.8%</td>
</tr>
</tbody>
</table>

http://www.dlt.ri.gov/lmi/proj/majorindproj.htm

Source: Occupational Employment Statistics Program, Rhode Island LMI Office

To assess the emerging demand industry sectors, a 10-year projection (2016-2026) was utilized. Of the highest expected growth sectors, the five sectors with the largest gains in total projected employment are:

- Accommodation and Food Services
- Health Care and Social Assistance
- Professional, Scientific, and Technical Services
- Retail Trade
- Administrative & Support & Waste Management & Remediation Services
The aforementioned “Rhode Island Innovates” 1.0 and 2.0 reports provide additional context and granularity to these projections. Within and across these broadly defined industries lie specific subsectors which reflect Rhode Island’s native strengths, are expected to grow at faster rates than even peer companies within the same industry classification and are likely to offer good paying jobs in specialized occupations that nearly all have an emphasis on technology. These subsectors and concentrations include:

- **Biomedical Innovation**: This growth area advances scientific knowledge of biological processes and systems in ways that are reshaping the diagnosis and treatment of disease. These advances converge with technological developments in electronics, information technology, imaging, and nanosciences to offer new insights that inform the creation and improvement of various biomedical products. Rhode Island has particularly strong market opportunities in neuroscience-related therapeutics; medical devices for orthopedic, biosensing, and neurological applications; and health care informatics and digital innovations.

- **IT / Software, Cyber-Physical Systems, and Data Analytics**: As the world transitions into the next phase of the information technology revolution, a range of technologies—including wireless communications, sensing and imaging data, and the Internet of Things—are converging with rising demand for technologies and applications capable of storing, processing, and analyzing large, complex datasets to inform real-time decisions. Specific opportunities for the state include cyber-physical systems and data analytics, autonomous underwater vehicles, remote medical device monitoring systems, environmental and energy monitoring, and smart grid infrastructure.

- **Defense Shipbuilding and Maritime**: Rhode Island is home to a wide range of maritime industry activities, including boat building, defense-related ship and submarine building, ocean cartography and engineering, and marine tourism. A highly integrated maritime economy that encompasses manufacturing, services, and research reinforces the state’s competitive advantages as the Ocean State.

- **Advanced Business Services**: Modern corporations rely on back-office and headquarter operations such as web services, data processing, marketing, client management, human resources, financial services, and strategy and product development support. Applying advanced technologies to these activities can help firms improve their competitiveness in the marketplace. Rhode Island can drive growth in this area by leveraging existing strengths and its strategic geographic location.

- **Arts, Education, Hospitality, and Tourism**: This growth area brings together creative and recreational services across the arts, higher education, hospitality, full-service restaurants, conventions, gambling, and tours and sightseeing. Opportunities include expanding on an already vibrant tourism industry and expected employment gains in higher education.
• **Design, Food, and Custom Manufacturing**: Industrial design provides significant competitive advantages for companies. Driven by rapid technological developments, falling costs, and 3D printing technology, industrial design is an increasingly important part of product and service development. Meanwhile, a burgeoning maker movement is lowering the barriers to designing and manufacturing goods. Particular opportunities for Rhode Island include rising demand for industrial design and growing interest in food manufacturing that stands at the nexus of food and health.

• **Transportation, Distribution, and Logistics**: This growth area encompasses the state’s multi-modal freight transportation system, which includes ocean shipping, rail shipping, and trucking. These activities inform decisions about warehouse siting and distribution networks as well as demand for logistics services. Rhode Island has particular opportunities in grocery wholesaling and warehousing and storage.

• **The Blue Economy**: The emerging Blue Economy should be a unifying initiative that can build on the distinctive and formidable assets of the National Undersea Warfare Center, Offshore Wind, URI, tourism, and enterprising groups like Sea Ahead. Rhode Island should “skate to where the puck is headed” and maximize its position as the nation’s premier “Ocean State” by investing in ocean technology.

• **Offshore Wind**: Rhode Island should maximize its potential in Offshore Wind through strategic investments in the maintenance and operations of this new industry’s increasingly robust supply chain.

• **‘Back Office’ Operations**: Given its strategic location, cost structure and talent pool, Rhode Island should take advantage of its potential to be an attractive, affordable Back Office market for major companies in New England and beyond.

As described in the Strategic portion of this plan; Rhode Island seeks to gain or maintain footholds in each of these high growth, high potential industries, subsectors, and concentrations; then work backwards from that demand signal to inform, develop, and reverse engineer pathways into those occupations. Further cementing the workforce development network as a key element within he state’s larger economic development structure; the Strategy portion also includes specific initiatives and priorities that result from, and align with, the Rhode Island Innovates economic analysis.
Emerging Demand Occupations

Using a ten-year projection to assess emerging demand occupations reveals that the top ten occupations in terms of projected growth are:

<table>
<thead>
<tr>
<th>SOC</th>
<th>Title</th>
<th>2016 Average Employment</th>
<th>2026 Projected Employment</th>
<th>Numeric Change</th>
<th>Total Openings Exits</th>
<th>Total Openings Transfers</th>
<th>Total Openings</th>
</tr>
</thead>
<tbody>
<tr>
<td>41-2031</td>
<td>Retail Salespersons</td>
<td>14,221</td>
<td>15,163</td>
<td>942</td>
<td>9,302</td>
<td>11,660</td>
<td>21,904</td>
</tr>
<tr>
<td>35-3031</td>
<td>Waiters and Waitresses</td>
<td>10,282</td>
<td>11,091</td>
<td>809</td>
<td>7,910</td>
<td>12,120</td>
<td>20,839</td>
</tr>
<tr>
<td>35-3021</td>
<td>Combined Food Preparation and Serving Workers, Fast Food</td>
<td>9,572</td>
<td>11,293</td>
<td>1,721</td>
<td>9,238</td>
<td>9,662</td>
<td>20,621</td>
</tr>
<tr>
<td>41-2011</td>
<td>Cashiers</td>
<td>10,561</td>
<td>10,487</td>
<td>(74)</td>
<td>9,881</td>
<td>9,643</td>
<td>19,450</td>
</tr>
<tr>
<td>43-4051</td>
<td>Customer Service Representatives</td>
<td>9,884</td>
<td>10,258</td>
<td>374</td>
<td>5,148</td>
<td>7,555</td>
<td>13,077</td>
</tr>
<tr>
<td>31-1014</td>
<td>Nursing Assistants</td>
<td>10,366</td>
<td>10,890</td>
<td>524</td>
<td>6,457</td>
<td>5,371</td>
<td>12,352</td>
</tr>
<tr>
<td>43-9061</td>
<td>Office Clerks, General</td>
<td>9,850</td>
<td>9,547</td>
<td>(303)</td>
<td>5,691</td>
<td>5,546</td>
<td>10,934</td>
</tr>
<tr>
<td>37-2011</td>
<td>Janitors and Cleaners, Except Maids and Housekeeping</td>
<td>7,370</td>
<td>7,926</td>
<td>556</td>
<td>4,979</td>
<td>4,811</td>
<td>10,346</td>
</tr>
<tr>
<td>43-5081</td>
<td>Stock Clerks and Order Fillers</td>
<td>7,246</td>
<td>7,755</td>
<td>509</td>
<td>4,095</td>
<td>5,343</td>
<td>9,947</td>
</tr>
<tr>
<td>53-7062</td>
<td>Laborers and Freight, Stock, and Material Movers, Hand</td>
<td>6,286</td>
<td>6,769</td>
<td>483</td>
<td>3,234</td>
<td>5,581</td>
<td>9,298</td>
</tr>
</tbody>
</table>

[http://www.dlt.ri.gov/lmi/proj/occprojalpha.htm](http://www.dlt.ri.gov/lmi/proj/occprojalpha.htm)

Source: Occupational Employment Statistics Program, Rhode Island LMI Office
As the cost of living increases in Rhode Island, it is important to consider not just jobs, but jobs that pay a sustainable wage. Overall, 31% percent of all projected job openings (growth and replacement) in Rhode Island are in major occupational groups identified as paying an entry-level wage necessary to support a family of four. The plan recognizes the importance of focusing on these family-sustaining occupations, while also recognizing the clear value in identifying occupations with momentum and demand that could lead to jobs that will remain in demand now and into the future.

This report also recognizes the importance of post-secondary credential attainment for the current and emerging job market. A 2014 Georgetown University Study found that as much as 70% of new jobs in Rhode Island would require some form of education past high school. Yet according to analysis by the Lumina foundation, in 2018 only 46.4% of Rhode Islanders held some form a post-secondary credential. This emphasis on post-secondary attainment is corroborated by state analysis as well. The below chart from the state Department of Labor and Training – Labor Market Information office demonstrates that nearly half of all job openings over the next ten years attributable to growth alone require education above a high school.

Source:
http://www.dlt.ri.gov/lmi/oes/majorocc.htm
http://livingwage.mit.edu/states/44

<table>
<thead>
<tr>
<th>Typical Education Needed for Job</th>
<th>Openings due to Growth (2016-2026)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Doctoral or professional degree</td>
<td>852</td>
</tr>
<tr>
<td>Master's Degree</td>
<td>724</td>
</tr>
<tr>
<td>Bachelor's Degree</td>
<td>8247</td>
</tr>
<tr>
<td>Associate Degree</td>
<td>782</td>
</tr>
<tr>
<td>Postsecondary Non-degree Award</td>
<td>1877</td>
</tr>
<tr>
<td>Some College, No Degree</td>
<td>112</td>
</tr>
<tr>
<td>High School Diploma or Equivalent</td>
<td>9712</td>
</tr>
<tr>
<td>No Formal Educational Credential</td>
<td>8158</td>
</tr>
</tbody>
</table>

Source: http://www.dlt.ri.gov/lmi/pdf/projeducreq.pdf
iii. Employers’ Employment Needs

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

For the occupations identified in both the LMI and Rhode Island Innovates analyses, a majority require high levels of one or more STEM (Science, Technology, Engineering and Math) fields. This suggests that a number of STEM competencies are highly valuable to employers and are associated with jobs with above average growth rates and typically pay a living wage.

In addition to STEM skills, multiple skills gap analysis, employer interviews, industry listening sessions and other inquiries identified certain skills that many Rhode Island employers identified as critical to employment, regardless of occupation. Whether referred to as ‘work readiness skills,’ ‘soft skills,’ or ‘essential skills’; these non-technical skills are an important factor in hiring and promotion decisions and will inform the collective strategy of the state workforce network:

- Critical thinking
- Reading comprehension
- Active listening
- Speaking
- Complex problem solving
- Judgment and decision making
- Teamwork
- Time management
- Writing

In recent years, additional skills preferences have been observed across industries that are not unique to any one occupation including:

- Social Media
- Data Analytics
- Multilingual proficiency
- Cultural competency

Many of these skills are related to skills expected of high demand fields in the state, yet the list is not limited to technical skills - interpersonal skills, language skills and cultural competency are also taking on increasing value in a more diverse and global 21st century economy.
B. Workforce Analysis

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

i. Employment and Unemployment

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

According to Rhode Island Department of Labor and Training – Labor Market Information Division, the total civilian labor force (seasonally adjusted) for Rhode Island in December 2019 was 558,500 of which 539,100 were employed, and 19,400 were unemployed, resulting in an unemployment rate of 3.5% percent. Unemployment levels in Rhode Island, however, vary substantially based on geographic and demographic factors, as well as an individual’s educational attainment. In 2018, unemployment in Rhode Island was 2.8% for people with an associate’s degree and less than 2.2% for an adult with a bachelor’s degree or higher. Unemployment rates for high school graduates was 4.1% and for those with less than a high school education it was 5.6%. Average earnings continue to be higher for those with higher levels of education.

http://www.dlt.ri.gov/lmi/ces/seasonal/2019.htm

Source: http://www.dlt.ri.gov/lmi/pdf/trends.pdf

There are fluctuations in the unemployment rate by city and town as well. In 2018 Providence, Woonsocket, and Central Falls all had average unemployment rates at or above 5.0%. Conversely, Jamestown, Narragansett, Richmond, and Barrington all had average unemployment rates below 3.0%.

http://www.dlt.ri.gov/lmi/pdf/stateofstate.pdf

Unemployment also varies dramatically by race and ethnicity. In 2018, the average unemployment rate in Rhode Island was 6.3% for African Americans, and 7.2% for Hispanics, as compared to 3.7% for Whites.

http://www.dlt.ri.gov/lmi/pdf/distrib18.pdf
Unemployment rates and workforce participation rates for populations with barriers to employment also differ from the overall state averages, in some cases significantly. The rates for youth, veterans, long-term unemployed, and individuals with disabilities are described below.

**Youth Unemployment:** The youth unemployment rate (ages 16 to 19) remains quite elevated. Over the twelve-month average for 2018, the youth unemployment rate stood at 18.1%, and increase from 14.6% in the year 2017.

**Veterans:** The average unemployment rate for Rhode Island veterans in 2018 was lower than the statewide average for the entire workforce (2.4% percent to 4.1% percent, respectively) Employment services for recently separated veterans play a critical role in the successful transition from military to civilian employment. The state’s workforce development network provides specialized services that are available only for eligible veterans, such as individualized job search assistance and case management for veterans with a service-connected disability or other barriers to employment, vocational and work-based training, as well as job fairs and hiring events specifically for veterans.

Returning veterans are often unaware of the range of services and benefits they earned through their service, or are unable to navigate the often complex web of agencies, programs, and providers that administer such benefits. The Rhode Island Office of Veteran’s Affairs ([http://www.vets.ri.gov/](http://www.vets.ri.gov/)) has begun offering navigation and consultation services for veterans from all recent combat eras to guide them to the services they need. The workforce development network worked in close consultation with the OVA to make sure veterans are fully aware of the career services available to them, and their priority for receiving such services.

[https://www.bls.gov/news.release/vet.t06A.htm](https://www.bls.gov/news.release/vet.t06A.htm)

**Individuals with Disabilities:** The Rhode Island workforce development network is firmly committed to providing high quality services for individuals with disabilities to help them compete for jobs and fully participate in workforce. Rhode Island was recently ranked 19th in the nation by a national advocacy group (RespectAbility) for employment of individuals with disabilities. There were just under 76,000 Rhode Islanders with disabilities in the workforce in 2018, of whom 40.6% were employed. Individuals with disabilities face a number of barriers to employment including employer biases and misconceptions, a lack of understanding of the supports available to promote their success, and lack of awareness of the benefits and opportunities of employing individuals with disabilities.

The Office of Rehabilitative Services (ORS) leads the way by providing the full range of rehabilitation services, including one-on-one vocational guidance and counseling, necessary to understand and mitigate the ways a disability impedes the capacity to show and apply talent at work. In Program Year 2018, ORS assisted 428 Rhode Islanders with disabilities to secure, retain or regain employment. These workers earned an average of $13.30 an hour working 26 hours a week on average. ORS further works with employers and community partners to increase opportunities for employment, career advancement and economic gain for eligible Rhode Islanders with disabilities.
In addition to the work of ORS, all Job Centers in Rhode Island are compliant with Section 188 of the Workforce Innovation and Opportunity Act, ensuring physical and programmatic access to all services and benefits available throughout the workforce development network. Ensuring physical and programmatic accessibility is also a component of the state’s certification policy for one-stop centers, which will help to further ensure that all customers can access services in all parts of the state.

Rhode Island’s Consent Decree

In 2014, the U.S. Department of Justice and the State of Rhode Island entered into an agreement to give 3,250 individuals with intellectual and developmental disabilities (IDD) the option of integrated day and employment services.

The state of RI recently negotiated a Consent Decree (CD) and Interim Settlement Agreement (ISA) with the Department of Justice (DOJ) to ensure that Employment First Principles and practices are utilized in planning and service delivery to adults, in-school youth and out-school youth with significant intellectual disabilities (I/DD) who need access to the continuum of Supported Employment Services in order to work. The DOJ court order requires three state agencies: (1) Office of Rehabilitation Services or ORS, (2) the Rhode Island Department of Education or RIDE and (3) the Behavioral Health, Developmental Disabilities and Hospitals or BHDDH to develop and implement a service delivery system that ensures individuals, adults and youth, with I/DD have access to integrated competitive employment opportunities in order to make fully informed choices about work. Although not a party to the DOJ court order, the Rhode Island Department of Labor and Training has joined the cross-agency effort, contributing resources and funding to the goal of increasing employment opportunities for persons with I/DD.

The Rhode Island employment rate of individuals with disabilities has improved in recent years. The 2019 ‘Disability Statistics Compendium’ released by Institute on Disability at the University of New Hampshire and relying on data collected by the Census Bureau, found that the employment rate for persons with a disability in Rhode Island jumped from 47th to 19th in 2017. Previously, the report found that Rhode Island had a 30% employment rate for persons with a disability. Through collaborative and sustained efforts to promote competitive, integrated employment, Rhode Island jumped to a 40.6% employment rate with over 7,000 people with disabilities entering the workforce in 2017 alone. To quote an article by RespectAbility released in response to the University of New Hampshire report, “Rhode Island shows that transformative success is possible.”

English-Language Learners: One of the fastest-growing segments of the Rhode Island labor force, adult English language learners face a number of barriers to employment. According to US Census data, nearly one quarter of Rhode Islanders spoke a language other than English at home, and over 13% of the total state population was foreign born. Cultural and linguistic barriers present a unique set of challenges above and beyond those that can be alleviated through support services and resources. English language acquisition services are primarily offered through the state’s AEFLA programming. In addition, the 2020 State Plan will place a special emphasis on community engagement and cultural competency, particularly on developing community partnerships to help English language learners and immigrants navigate and access career and supportive services that lead to jobs. The project focused on aligning job training, adult education and support services for individuals with limited English-language proficiency.

Long-term Unemployed: In November 2019, 30.4%, (5,960 of 19,591) of Rhode Island’s unemployed workers were eligible to collect Unemployment Insurance (UI) benefits. Of that amount, over 24% 1,441 faced long-term unemployment, defined as collecting unemployment benefits for more than fourteen weeks. The long-term unemployed often face social and emotional challenges related to the duration of their unemployment, beyond the financial and economic challenges traditionally associated with unemployment. These deficiencies require intensive “wraparound” services to address these issues effectively, while rapidly moving individuals to paid work experience and reemployment.

This continued need has prompted a number of targeted efforts including the state and federally funded Platform to Employment program, which offers intensive social-emotional supports, financial counseling, intensive job search and work readiness coaching, and a subsidized paid work experience to aide long-term unemployed job seekers in returning to work.

http://www.dlt.ri.gov/lmi/pdf/eb/dec19eb.pdf

ii. Labor Market Trends

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

Industry

The “Rhode Island Innovates” report found that Rhode Island “will face near- and longer-term challenges in mobilizing the kinds of technical skills needed to grow its advanced industries. The current working-age population is nationally competitive, but is behind that of the New England educational attainment rate. Rhode Island ranks fifth of six New England states with regard to percentage of population with a postsecondary credential; yet the State has strong job growth in high-skill jobs requiring at least a bachelor’s degree and middle-skill jobs requiring some postsecondary credential/associate’s degree.” This divergence portends to create a shortage of labor supply for Rhode Island businesses.
According to the RIDLT Labor Market Information’s 2026 industry Outlook Report Rhode Island employment is expected to increase by more than 30,400 jobs during the 2016-2026 projection period (http://www.dlt.ri.gov/lmi/pdf/indoutlook.pdf). Employment by 2026 is projected to reach 550,750 - an increase of 36,076 (5.9%) jobs from the 2016 employment level. Nationally employment is projected to increase by 7.4%.

Much of this growth is attributed to the increased demand for the products and services provided by the Health Care & Social Assistance; Accommodation & Food Services; Professional, Scientific and Technical Services; Administrative & Waste Services; Construction and Manufacturing sectors. The largest single industry will continue to be the Health Care & Social Assistance sector, representing 86,500 jobs by 2026. This sector is expected to account for over 13% of the new job growth expected in the state during the 2016-2026 projection period, driven by continued increases in the number of insured, medical advances and technology, along with an aging population.

Accommodation & Food Services will increase by the largest total number of jobs (4,557) during the 2016-2026 projection period (a 9.5% increase over 2016 employment); and the Professional, Scientific, & Technical Services sector projects to have some of the largest percentage (12.4%) and numeric (3,055) job growth over the projection period.

The Construction sector is projected to grow at the fastest rate (12.5%) of all industries during the 2016-2026 projection period. Prior to the Great Recession, employment in this sector averaged 22,000 jobs. The total jobs in the section reached a low of 15,400 in February 2011 and now projects to employ 27,627 by 2026. This growth is partially driven by continued economic recovery, as well as substantial public works projects to repair roads and bridges (http://www.dot.ri.gov/projects/projects_metropolitan_providence.php) and repair and upgrade public schools (https://www.wpri.com/community/education/ri-begins-rebuilding-schools-after-voters-approve-250-million-repair-bond/1579533471).

Population

Rhode Island’s increasing diversity, and the educational achievement gap between populations, is an important factor influencing the labor market. In 2018, the share of the state population identifying as ‘white non-Hispanic’ was 72.5%, down from 76.4% in 2010, and 81.9% in 2000. The share of state’s population identifying as Black or African American was 8.2% in 2018, up from 5.7% in 2010 and 4.5% in 2000. Some of the state’s largest growth has been in its Hispanic or Latino population which represented 15.5% of the state’s population in 2018, as compared to 12.4% in 2010 and 8.7% in 2000.

The “Rhode Island Innovates” report uses blunt statistics to illustrate how Rhode Island is divided by racial, ethnic, gender, and income lines in preparing people of color and low-income communities for employment its advanced and opportunity industries. For example; in 2015 and 2017, the National Assessment of Educational Progress, (also known as the Nation’s Report Card, tested nearly 300,000 Rhode Island students in grades 4 and 8. Results from both years indicated large gaps between white and minority students, as well as middle-income students and those from low-income families.
In 2017, black students had an average score that was 27 points lower than that for white students — a gap that hasn’t significantly changed since 1998. Latino students — the fastest-growing demographic in Rhode Island — have made some progress in fourth-grade reading but still had an average score that was 27 points lower than that for white students in 2017 (narrowing from 48 points in 1998). Rhode Island has also not substantially closed the gap between students from more affluent families and those from less advantaged ones; average results from higher income communities continue to significantly outpace results from low income communities.

With nearly 1/3 of the state’s PK-12 population Hispanic or black and almost half coming from low-income families; the ability to sustain, let alone grow, the state’s workforce is in question. Rhode Island will need enough workers to replace the retiring Baby Boomer generation, as well as fill additional growth in high- and middle-skill jobs. In order to remain competitive, Rhode Island must prepare all of its citizens for the new economy.

A key factor that will continue to impact and influence the state’s labor market is the rapid aging of the state’s Rhode Island’s workforce population. When it comes to working age citizens, in 2019 Rhode Islander’s aged 15-59 constituted 60% of Rhode Island’s population; down from 62% in 2010 and 2000. Persons aged 60 and older made up 25% of the state’s population in 2019, up from 20% in 2010 and 18.2% in 2000. Children 14 years of younger represent 16% of the state’s population in 2019, down from 17.3% in 2010 and nearly 20% in 2000. The continued aging of the state’s population, and related shrinking of the working age population, is a critical factor influencing the labor market for the foreseeable future.

A final critical trend in the state’s labor market is Rhode Island’s growing immigrant population. In the year 2000, the percentage of foreign-born residents within the state population was 11.4%. In 2010 it rose further increased to 12.9%. By 2018, 13.7% of the state population was foreign-born. This increase has a significant consequence for the state’s labor market, as well as the structure and organization of the state workforce development system.
iii. Education and Skill Levels of the Workforce

The education attainment of Rhode Island’s current working-age population is nationally competitive but is behind that of the New England educational attainment rate. Rhode Island ranks fifth of six states in New England with regard to percentage of working-age residents holding postsecondary credentials (46.4%). In 2018, the state of Rhode Island announced an ambitious goal of reaching 70% of working age residents with a postsecondary credential by 2025.

Focusing specifically on the percent of the population with a bachelor’s degree or more, Rhode Island is near or within the top ten states. According to 2017 US Census estimates, 33% of Rhode Islanders held a bachelor’s degree, with 13.1% holding a degree beyond a Bachelor’s; ranking 13th and 10th on these respective measures. Yet, despite this comparatively high attainment of advanced degrees; the state workforce remains somewhat bifurcated; with Rhode Island ranking 34th in the nation for the percent of the population with a high school degree at 87.3%, tied with the national average.

Irrespective of degree attainment, the Brookings Report found that Rhode Island has lagged in providing specific skills and focusing on areas of discipline most associated with success in the 21st century economy - this may result in a shortage of labor supply for Rhode Island businesses and is particularly acute in computer programming and coding jobs, which have seen thousands of openings each year in Rhode Island. The number of occupations requiring STEAM degrees is also growing in the state, but Rhode Island produces the lowest or almost lowest number of STEAM degrees among its benchmark states and in the region.

Rhode Island has responded aggressively to these reported skills gaps. As part of its on-going work to reimagine high schools in Rhode Island, beginning in the fall of 2016 Rhode Island launched a new initiative called the Advanced Coursework Network – public school students in schools and districts that join the network will be able to take advanced-level, credit-bearing courses offered by a wide range of approved providers at no cost to themselves or their families, subject to available state and district funds.

The state also launched CS4RI (Computer Science for Rhode Island) - an initiative to bring high quality computer science (CS) learning experiences to all students. CS4RI is a partnership between Rhode Island state government, the Rhode Island Department of Education, K-12 schools, higher education, private industry, and non-profits across the Rhode Island. In December 2017, Rhode Island officially met its goal of having computer science taught in every Rhode Island public high school.

Lastly, the state launched PrepareRI - Rhode Island’s 3-year action plan to ensure all Rhode Island students are college and career ready by graduation – in 2017. PrepareRI represents a strategic partnership between the Rhode Island government, private industry leaders, the public education system, universities, and non-profits across the state. PrepareRI launched after Rhode Island was one of ten states awarded a $2 million New Skills for Youth grant from JPMorgan Chase and the Council of Chief State School Officers (CCSSO).
For students, PrepareRI aims to close the gap between what they learn in school and what they need for in-demand jobs. The initiative was built on the belief that all young people — regardless of their background or intended career — will need some form of postsecondary credential and work experience to be successful. For businesses, PrepareRI ensures that employers have the workforce they require to thrive in the economy of tomorrow. This fills a crucial need in Rhode Island: currently, less than 45% of residents have a post-secondary degree or industry-recognized certificate, yet 70% of jobs will require those credentials by 2020. PrepareRI scales out activities such as career exploration and work-based learning and expands high-quality career and technical education programs and opportunities for high school students to earn credentials and postsecondary credit.

The PrepareRI workplan includes a state commitment to the goal that all high school students have access to a work-based learning experience before they graduate and includes significant investments and guidance as follows:

- The incubation of a Statewide Career Readiness Intermediary – a centralized entity serves as a facilitator for employers, schools, and providers to develop youth work experiences and work-based learning opportunities, streamline and coordinate processes, eliminate duplication and confusion, and take the effort to scale statewide. The Intermediary also manages the PrepareRI Internship Program, a high-quality paid summer internship program for high school students at top Rhode Island companies. The PrepareRI Internship program launched in Summer 2018 with 162 students, and has expanded since – this Summer, 400 students will be placed into high-quality paid internships.

- Investments in “Real Skills for Youth” partnerships among schools, youth-serving organizations, industry, and others to develop and implement high-quality paid work-based learning experiences for youth in the summer and year-round career readiness programming for youth; while the focus is primarily on in-school youth, out-of-school youth with be served under these partnerships as well, with opportunities to braid WIOA funds.

- The State Workforce Board issued guidance on the state vision for work-based learning (WBL), including definitions of activities, standards of quality, essential skills needed for the workplace, and legal guidance. [viewable here: https://static1.squarespace.com/static/59a81489579fb39e3ef2232f/t/5c06c4a4758d464fc08e9400/1543947430063/GWB+WBL+Guidance_COMBINED_updated+12.04.18.pdf]

Though the external grant from JP Morgan Chase has ended, the interagency team is currently setting ambitious goals for the next phase of PrepareRI to continue the work. This next phase of PrepareRI is aligned with the Youth portion of the WIOA state plan along with the State’s Perkins V plan to create a unified vision for preparing youth for success in college and career. This vision is built on a theory of action that moves young people along a career pathway through meaningful career exposure and exploration of potential career paths and their on-ramps, skill-building with an emphasis on essential and professional skills, and supported work-based learning experiences that allow participants to apply learning in a real-world setting.
Sources:


https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_17_1YR_S1501&prodType=table


https://www.cs4ri.org/

https://www.prepare-ri.org/
iv. Skill Gaps

Describe apparent ‘skill gaps’.

To remain competitive, Rhode Island businesses need an adequate supply of job-ready workers. Skills are essential at every level of the workforce. A more highly skilled workforce will be better able to adapt to the changing needs of businesses in an evolving economy.

For the occupations identified in both the LMI and Rhode Island Innovates analyses, a majority require high levels of one or more STEM (Science, Technology, Engineering, and Math) fields. During the 2014 to 2024 Projection Period for Rhode Island, employment in STEM occupations is projected to grow at about 13%, much faster than the 7.8% growth rate projected for all occupations in the state. During the projection period, Rhode Island employers will seek to fill over 9,000 STEM-related openings resulting from both occupational growth and the need to replace workers who leave their occupation. Yet, as mentioned previously; Rhode Island produces the lowest or almost lowest number of STEM degrees among benchmark states and in the region. Rhode Island also has challenges and apparent ‘skills gaps’ within the future workforce. High school students remain insufficiently prepared to enter STEM careers, showing a lack of proficiency in science and math.

This ‘gap’ between supply and demand for advanced skills is evident when reviewing the state Division of Labor Market Information’s Labor Shortage/Surplus analysis. For the Third Quarter 2019 that analysis compares the number of postings (demand) for job openings on publicly accessible employment boards with the number of unemployed claimants (supply) from those occupations. Generally, the analysis found sizable labor surpluses in occupations requiring a high school degree or less.

<table>
<thead>
<tr>
<th>Occupation Title</th>
<th>EmployRI Postings</th>
<th>UI Claimants</th>
<th>Claimants per Posting</th>
<th>Education</th>
</tr>
</thead>
<tbody>
<tr>
<td>Secretaries &amp; Administrative Assistants</td>
<td>8</td>
<td>74</td>
<td>9.3</td>
<td>High School/GED</td>
</tr>
<tr>
<td>Packers &amp; Packagers, Hand</td>
<td>8</td>
<td>72</td>
<td>9.0</td>
<td>Less than HS</td>
</tr>
<tr>
<td>Carpenters</td>
<td>7</td>
<td>51</td>
<td>7.3</td>
<td>High School/GED</td>
</tr>
<tr>
<td>Construction Laborers</td>
<td>6</td>
<td>30</td>
<td>5.0</td>
<td>Less than HS</td>
</tr>
<tr>
<td>Medical Secretaries</td>
<td>15</td>
<td>64</td>
<td>4.3</td>
<td>High School/GED</td>
</tr>
<tr>
<td>Team Assemblers</td>
<td>11</td>
<td>44</td>
<td>4.0</td>
<td>High School/GED</td>
</tr>
<tr>
<td>Sales Reps., Wholesale &amp; Mfg, Except Technical &amp; Scientific</td>
<td>11</td>
<td>40</td>
<td>3.6</td>
<td>High School/GED</td>
</tr>
<tr>
<td>Office Clerks, General</td>
<td>17</td>
<td>46</td>
<td>2.7</td>
<td>High School/GED</td>
</tr>
<tr>
<td>Supervisors of Office &amp; Administrative Support Workers</td>
<td>41</td>
<td>69</td>
<td>1.7</td>
<td>High School/GED</td>
</tr>
<tr>
<td>Billing &amp; Posting Clerks</td>
<td>21</td>
<td>33</td>
<td>1.6</td>
<td>High School/GED</td>
</tr>
</tbody>
</table>
Conversely, the analysis found sizable labor shortages in occupations requiring some form of postsecondary attainment, including occupational certificates, Associates degrees, Bachelor’s degrees, and other advanced degrees.

<table>
<thead>
<tr>
<th>Occupation Title</th>
<th>EmployRI Postings</th>
<th>UI Claimants</th>
<th>Employ RI Postings per UI Claimant</th>
<th>Education</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical Therapists</td>
<td>77</td>
<td>1</td>
<td>77.0</td>
<td>Doctoral/Professional</td>
</tr>
<tr>
<td>Computer Programmers</td>
<td>171</td>
<td>3</td>
<td>57.0</td>
<td>Bachelor’s</td>
</tr>
<tr>
<td>Occupational Therapists</td>
<td>42</td>
<td>1</td>
<td>42.0</td>
<td>Master’s</td>
</tr>
<tr>
<td>Speech-Language Pathologists</td>
<td>40</td>
<td>1</td>
<td>40.0</td>
<td>Master’s</td>
</tr>
<tr>
<td>Financial Analysts</td>
<td>40</td>
<td>1</td>
<td>40.0</td>
<td>Bachelor’s</td>
</tr>
<tr>
<td>Radiologic Technologist &amp; Technicians</td>
<td>31</td>
<td>0</td>
<td>31.0</td>
<td>Associate</td>
</tr>
<tr>
<td>Medical &amp; Clinical Laboratory Technologists</td>
<td>23</td>
<td>0</td>
<td>23.0</td>
<td>Bachelor’s</td>
</tr>
<tr>
<td>Electrical Engineers</td>
<td>21</td>
<td>1</td>
<td>21.0</td>
<td>Bachelor’s</td>
</tr>
<tr>
<td>Licensed Practical &amp; Licensed Vocational Nurses</td>
<td>116</td>
<td>6</td>
<td>19.3</td>
<td>Some Postsecondary</td>
</tr>
</tbody>
</table>

http://www.dlt.ri.gov/lmi/publications/stem.htm
http://www.dlt.ri.gov/lmi/pdf/s&d319.pdf
2. Workforce Development, Education and Training Activities Analysis

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

A. The State’s Workforce Development Activities

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

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

Rhode Island’s workforce development activities are coordinated through the following state agencies: the Rhode Island Department of Labor and Training (DLT), the Rhode Island Department of Education (RIDE), and the Rhode Island Department of Human Services (DHS). These agencies are responsible for all the core and non-core programs included in the combined state plan.

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<th>State Agency WIOA Program Responsibility</th>
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The Rhode Island Governor’s Workforce Board (GWB) is the governing body charged with the continuous improvement of the workforce system and oversight of Workforce Innovation and Opportunity Act (WIOA) funds and programs. GWB ensures that the state workforce activities are aligned with the efforts of economic development, education, workforce development, government, and business stakeholders at the local and state level. This multifaceted alignment of public and private stakeholders creates a workforce system that is demand-driven, flexible, and responsive to the needs of Rhode Islanders.

The work of the Governor’s Workforce Board is accompanied by two local boards – Workforce Solutions of Providence-Cranston and the Workforce Partnership of Greater Rhode Island - who offer strategic direction for workforce activities at the municipal level, while also providing local guidance for implementation of workforce programs. The partnerships and atmosphere of collaboration guided by state agencies and the GWB extend to the local areas to create a fully integrated workforce system of not only core and non-core federal program partners, but also state and privately funded programming, resulting in a system that provides impactful services and activities throughout the state.

Rhode Island’s netWorkRI Career Centers are the physical hub of much of the state’s workforce activities, and represent Rhode Island’s version of the American Jobs Center. There are presently four workforce centers spread geographically across the state.

The netWorkRI Career Centers are overseen at the state level by the Department of Labor and Training, and are managed locally by each of the local area boards. Local boards are comprised of local businesses, labor, partner agencies, and other key stakeholders to create a diverse and functional group. The boards, in alignment with the States’ vision, provide front line strategic implementation for state-wide initiatives in addition to any programming that is unique to their region. Local boards are tasked with procuring a one-stop operator for the daily operation of their perspective center(s) in accordance with WIOA 121(d). These boards carry out workforce activities by partnering locally through Memorandums of Understanding (MOU) to implement core, non-core, and other partner programs.

Collaboration of Activities

Communication is vital in order to coordinate and align workforce services statewide. This communication starts with the GWB which has representation from DLT, RIDE, DHS, Rhode Island’s postsecondary education system, and the Rhode Island Department of Commerce. Communication is further enhanced by the collaborative efforts of the Interagency Coordination Workgroup. This workgroup is comprised of Senior Manager-level staff within each Department represented on the Board – positioned between frontline program delivery and Cabinet/director level policy making - that work together on:

- Policy development, review, and feedback
- Performance data sharing and submission
- Troubleshooting and cooperative problem solving
- Technical Assistance and best practices
- Strategic review and resources alignment
- System reform and innovation
The GWB maintains a portion of its website dedicated to policymaking, planning, and resource sharing through the workforce development network (https://gwb.ri.gov/policy-and-planning). The website lists all board policies and guidances, presentations and related collateral, and state plans, and is viewable by all workforce stakeholders and partners, including businesses, workforce professionals, government, and others. This resource allows for all stakeholders within the workforce development system to readily

Program Overviews

Core and Non-Core WIOA Programs

**Adult, Dislocated Worker and Youth**: Title I of WIOA is the vehicle through which Rhode Island provide job search, education, and training activities for individuals seeking to gain or improve their employment prospects. Title I also funds the One-Stop delivery system. Activities funded through Title I provide job search, education, and training activities for individuals seeking to gain or improve their employment prospects. Services include: Basic career services, Individualized career services and Training services.

**Wagner-Peyser**: Wagner Peyser is the major funding source for the one-stop system. The WP act of 1933 established a nationwide system of employment offices known as Employment Service. The Employment Service provides employment-related labor exchange services including but not limited to job search assistance, job referral and placement assistance for job seekers, reemployment services to unemployment insurance claimants, and recruitment services to employers with job openings. Services are delivered in one of three modes including self-service, facilitated self-help services and staff-assisted service delivery approaches. Veterans receive priority referral to jobs and training as well as special employment services and assistance. The system provides specialized attention and service to individuals with disabilities, migrant and seasonal farm-workers, ex-offenders, youth, minorities and older workers.

**Trade Act (TAA)**: Provides special benefits under the Trade Adjustment Assistance(TAA) program to those who were laid off or had hours reduced because their employer was adversely affected by increased imports from other countries. These benefits include paid training for a new job, financial help in making a job search in other areas, or relocation to an area where jobs are more plentiful. Those who qualify may be entitled to weekly TRA after their unemployment compensation is exhausted.

**Foreign Labor Exchange and Migrant Workers (MSFW)**: The foreign labor certification process allows employers to hire foreign workers, who are temporarily authorized by the U.S. Citizenship and Immigration Service to live and work in the United States on a temporary basis. A qualifying business must demonstrate its inability to fill the position with a qualified citizen at prevailing wages.
Senior Community Services Employment Program (SCSEP): The Senior Community Service Employment Program (SCSEP) is a service and work-based program for low-income individuals aged 55 and older. DLT administers the program which includes recruitment and outreach, eligibility screening, enrollment assessment, Individual Employment Plans, follow-up, work site placement, monitoring and enrollee recertification. Through SCSEP, enrollees are placed at Host Agency sites for up to 30 hours per week and are compensated with wages commensurate with their occupation. Host Agency sites include faith-based organizations, senior centers, community action programs and community-based organizations. These agencies prepare and train participants for future unsubsidized employment. The program is a bridge leading to unsubsidized employment and works to reintegrate participants into the workforce. Eligible SCSEP applicants must reside in Rhode Island, be unemployed at the time of application and be a member of a family with an income not more than 125 percent of federal poverty guidelines. Priority is given to applicants over the age of 60, veterans and spouses of veterans. Preference is given to limited English-speaking, minority applicants.

JVSG: JVSG funds are provided to states to fund two staff positions; Local Veteran Employment Representative (LVER) and Disabled Veteran Outreach Program Specialist (DVOP) which are fully integration in each American Job Center (AJC). Our integration strategy includes a streamline referral process to all partner programs such as WIOA and other combined state plan partners. Furthermore, DVOP specialists provide intensive services and facilitates placements to meet the employment needs of veterans, prioritizing service to special disabled veterans, other disabled veterans, and other categories of veterans in accordance with priorities determined by the Secretary of Labor. DVOP Specialists refer eligible veterans and eligible persons to all partner programs as determined in their comprehensive assessment. Additionally, DVOP Specialist receive referrals from other state partner programs such as; WIOA Title 1B for those eligible veterans and eligible persons who have been determined to have one or more Significant Barriers to Employment (SBE). In addition, LVER staff must perform only the duties outlined in 38 U.S.C. 4104(5), which are related to outreach to the employer community and facilitation within the state’s employment service delivery system. Therefore, LVERs must be assigned duties that promote to employers, employer associations, and business groups the advantages of hiring veterans. LVERs are also responsible for facilitating employment, training, and placement services furnished to veterans in the State.

Disability Employment Initiative (DEI): This program provides an integrated service system that creates a “One-Stop” entry point for individuals with disabilities to gain entrance to competitive and/or self-employment. This is accomplished by improving coordination and collaboration among employment and training programs implemented at state and local levels, including the “Ticket to Work” program under the SSA that enables disabled individuals to access employment services at an employment network site and other effective community partnerships that leverage public and private resources to better serve individuals with disabilities and improve employment outcomes. The array of services provided to DEI participants include; placement in suitable jobs, job search workshops, counseling, core, intensive, and training services, referral to supportive services, outreach to employers, and outreach to individuals with disabilities by providing services at various locations around the state.
Reemployment and Eligibility Assessment Program (RESEA): The State has conducted the Reemployment Services and Eligibility Assessment (RESEA) program (previously REA) since 2005 and continues to do so. Currently under the program, all UCX claimants and UI claimants deemed most likely to exhaust benefits (based on profiling scores) are directed to report to the One-Stops for mandatory participation in RESEA. The program focuses on providing participants with an overview of and access to the services available at the One-Stop Centers as well as through the state’s Virtual One-Stop (EmployRI), a detailed review of the claimant’s responsibilities while collecting UI, and assistance accessing the resources necessary to lessen the time on unemployment and to return to work as quickly as possible.

Reintegration of Ex-Offenders Program (RExO) (Corrections): Through the Office of Rehabilitative Services and Correctional Industries, the Department of Corrections provides a series of educational and training programs to inmates at the Adult Correctional Institution (ACI). Educational and training services include special education, adult education, GED, postsecondary classes and occupational skill development offered through a partnership with the Community College of Rhode Island (CCRI). These classes are funded primarily through state general revenue dollars. Outcomes range from standard ESL and ABE measures such as gains in educational functional levels to credentials such as GED and occupational skill certifications. Many of these programs place an emphasis on work-readiness and soft-skill development in preparation for those transitioning out of prison and into the workforce. DOC and its community partners work hard at developing relationships with employers willing to hire exoffenders.

RIWORKS (DHS-DLT): Rhode Island Works is Rhode Island’s cash assistance program. The program provides cash assistance and employment support services to enable parents with children to support their families. Rhode Island Works (RIGL 40-5.2-5) replaced the Family Independence Program in 2008. Rhode Island Works is funded through the federal Temporary Assistance to Needy Families (TANF) program. TANF was enacted in 1996, replacing the nation’s welfare program, Aid to Families with Dependent Children. As of December 1, 2019, there were 9463 individuals receiving RI Works. The average monthly cost per person was $184.00, at a total monthly program cost of $1.74 million, which is 100% federally funded. As a condition of eligibility, recipients must enter into an employment plan developed in coordination with the Department of Human Services (DHS) and other contracted vendors. For most parents, the employment plan begins with an assessment for job readiness. Single parents must work or participate in a work plan for either 30 hours per week, or 20 hours if the household includes a child under age six. In two-parent families, one parent must work or participate in their work plan for 35 hours per week; if the family uses a childcare subsidy, both parents must work a combined total of 55 hours per week. Receipt of cash benefits under Rhode Island Works is subject to time limits. A family can receive assistance for no more than 48 months, whether or not consecutive, in any 60-month period prior to requesting hardship.
The goal of the Rhode Island Works Program (RI Works) is to help very low-income families meet their basic needs by providing cash assistance and work supports, including employment services, SNAP benefits, health insurance, and subsidized child care. Children and families qualify for cash assistance based on their income, resources, and the number of people in their families. RI Works cash assistance recipients must participate in an employment plan unless they meet specific criteria for an exemption. The employment plan considers the parent’s skills, education, and family responsibilities as well as local employment opportunities and creates a program of action to help the parent meet his or her employment goals. Parents are informed about opportunities to seek additional education or training to improve their employability prospects. RI Works provides a safety net for some children whose parents are unable to work due to a disability and can function as an unemployment system for parents who do not have sufficient earnings or work experience to qualify for unemployment benefits. RI Works currently provides time-limited supplementary cash assistance to very low-income working families.

The average hourly wage for job placements receiving RI Works in 2019 was $13.00. RI Works mandates families to the Office of Child Support Services, which assists families in establishing paternity, when applicable; identifying and locating non-custodial parents; and obtaining child support payments from non-custodial parents. In Rhode Island, the first $50 of child support paid on time each month on behalf of a child enrolled in RI Works goes to the custodial parent caring for the child. The balance is shared by the state and federal governments as reimbursement for assistance received through RI Works. The maximum monthly RI Works benefit for a family of three is $554 per month. Families receiving the maximum monthly cash benefit have incomes that are less than one-half the federal poverty level and are living in extreme poverty.

In addition to its partnership with the Department of Labor and Training and other WIOA core partners, the Department of Human Services works with a variety of contracted providers, known as Prime Vendors, who assist RI Works families in achieving their goal of employment and self-sufficiency. DHS has contracted vendors for a variety of services such as education, employment, and case management services.

- Comprehensive Community Action Program, CCAP, in collaboration with their RI Works statewide community partners, offer supportive services in seven locations throughout the state. RI Works participants who are experiencing short-term or long-term barriers to finding employment may be referred for CCAP – Supportive Services. CCAP provides the following services with case management: assessment, DCYF services, Domestic Violence intervention, Housing Search, Learning Disability Evaluation/Treatment, Mental Health Treatment (Referral and/or Monitoring), ORS/Vocational Rehabilitation, Physical Health Treatment (Referral and/or Monitoring), SSI evaluation, substance abuse treatment (Referral and/or Monitoring). CCAP, along with its RI Works statewide community partners, is also a valuable resource for basic and emergency needs such as: emergency food, heating assistance, WIC, shelter programs and clothing programs.
A RI Works parent may be referred to CCAP for Vocational Training as all or part of their Employment Plan. CCAP will assess the parent their interests, skills and abilities before placement in a training program. Once the participant has met the prerequisites of the training program, CCAP will arrange for the participant’s placement in a class that meets their needs. Below are some of the activities that a parent can be referred for as part of Vocational Training: Vocational Assessment, Vocational Education, which may include Post-Secondary, Job Search (following Vocational Education), and employment.

RI Works parents who have fewer barriers to employment may be referred to CCAP’s Work Readiness component. Parents who participate are deemed to be the most “Employment Ready” of the RI Works population. Some of the available activities within CCAP’s Work Readiness component include assessment, Community Work Experience, job search, on the job training (OJT), subsidized employment for both private and public sectors and employment.

- ResCare offers intensive case management programs to their RI Works parents in multiple locations throughout the state. RI Works participants who are experiencing short-term or long-term barriers to finding employment may be referred for ResCare for Vocational Training and/or Work Readiness. ResCare thoroughly assesses every parent, initiates short term and longer-term goal setting, in addition to their cohort orientation and group programing.

A RI Works parent may be referred to ResCare for Vocational Training as all or part of their Employment Plan. ResCare assess the parent using their interests, skills and testing scores prior to confirming appropriate placements in training programs. Once the participant has met the prerequisites of the training program, ResCare will arrange for the participant’s placement in that program. Below are some of the activities that a parent can be referred for as part of Vocational Training: Vocational Assessment, Vocational Education, which may include Post-Secondary, Job Search (following Vocational Education), and employment.

RI Works parents who have fewer barriers to employment may be referred to ResCare’s Work Readiness component. Parents who participate are coached to find employment that best suits them and their family’s needs, including location, income, and transportation. Some of the available activities within ResCare’s Work Readiness component include assessment, Community Work Experience, job search, on the job training (OJT), subsidized employment for both private and public sectors and employment.

- South Shore Services is contracted with DHS to offer both supportive services through its Family Connections program, and work readiness.

Family Connections provides an intensive home and community-based program for the families who are currently receiving RI Works and who have been identified as having barriers to employment. This may include a disabling condition that may or may not prevent them from being employment ready. Family Connections offers Case Management and assessment services for all referred. Family Connections has
programming geared toward supporting families in their transitions from dependence on RI Works to self-sufficiency by assisting them in addressing barriers to employment and/or applying for SSI or SSDI.

RI Works parents who are “Employment Ready” with fewer barriers to employment may be referred to South Shore Services Work Readiness component. South Shore Services provides their Work Readiness activities statewide via community-based appointments, home visits and media-based communication. Assessment, Community Work Experience, Job Search, On-The-Job Training, Subsidized Employment and employment are some of the work readiness components available through South Shore Services.

- Project Opportunity - this program, funded by DHS through R.I.D.E. (Rhode Island Department of Education), is designed to service RI Works parents who need ABE (Adult Basic Education), GED (General Equivalency Diploma), or ESL (English as a Second Language) classes. Project Opportunity provides intensive adult education for parents seeking employment. The desired outcome of this program is to bring RI Works parents up to a level at which they are ready to look for work.

- The Teen & Family Development (TFD) program, offered through CCAP or ResCare, services RI Works parents who are under the age of 20, and do not yet have a High School Diploma or GED. RI state law mandates that the employment plan for teens under the age of 20, and without their high school credentials, must be working towards their High School Diploma or GED. ResCare or CCAP will assist in enrolling the teen in an appropriate educational site. Once the parent achieves their HSD or GED, the vendor will continue to work with that parent to assist in the development of an educational, vocational, or employment career pathway for self-sufficiency.

- The REACH program at the Community College of Rhode Island - Customers attend CCRI programs and are assigned to a coordinator to provide case management and support in order to successfully attain their educational goals. Participants must have a High School Diploma, or a GED and a minimum of 10th grade TABE scores. Outcomes vary based on the educational goals of each individual. At the end of the program, the participants are one step closer to employability than beforehand.
Adult Education and Family Literacy (RIDE): The Rhode Island Department of Elementary and Secondary Education (RIDE) is responsible for all K-12 education in the state, as well as those programs that serve out of school youth and adults working to improve literacy, numeracy, English language and workforce basic skills or to acquire a GED. The funds presented under this category are those for which the GWB has policy oversight include education funds under Title II of the Workforce Innovation and Opportunity Act.

The core mission of adult education is to provide adults with the basic academic knowledge and skills they need to participate in civic life and the workforce. Adult education programs serve students who have educational objectives such as learning to speak English; passing the oral and written exams for U.S. citizenship; earning a high school diploma; receiving job training; and obtaining proficiency in reading, writing, and mathematics to succeed in college, careers and community life. Adult education programs in Rhode Island are located in community-based organizations, public school districts, college campuses, public libraries, and the state correctional facilities. Each of these is uniquely designed to include various combinations of the following components: basic academic skills instruction, work readiness, occupational skills training, structured work exposure activities, work experiences (such as internships or community service assignments), case management, wrap-around support services, and career coaching and job placement. These services may target welfare recipients; homeless adults; prisoners in reentry; unemployed or dislocated workers; incumbent workers in transition to new jobs and advancement in employment; English Language Learners; and other eligible persons at all educational functioning levels including the lowest levels of literacy, numeracy, and English-language proficiency. Program offerings also include contextualized classes in specific industry sectors to prepare adults for employment and career pathways.

Collaboration among RIDE, the Governor’s Office and the Governor’s Workforce Board has led to the establishment of key investment priorities in the following outcome areas:

- Adoption of new and innovation models for adult education, such as the “RI-BEST” (Integrated Basic Education and Skills Training) approach to enable students to earn their GED, post-secondary credit, and receive job training at the same time;
- Provision of comprehensive community-based classroom Adult Basic Education, Adult Secondary Education, and English as a Second Language (English for Speakers of Other Languages);
- Expansion of distance learning;
- Expansion of adult education that is contextualized and supports career pathways for youth and adults in Rhode Island’s critical and emerging industries;
- Integration of pre- and post-release adult education services for the incarcerated;
- Expansion of transition to postsecondary education and training/apprenticeship programs that use dual or concurrent enrollment including rigorous Adult Secondary Education for those preparing for postsecondary education based on internationally benchmarked college and career-readiness standards;
**Carl D. Perkins Career and Technical Education (RIDE):** Carl D. Perkins Vocational and Technical Education Act is dedicated to increasing learner access to high-quality Career Technical Education (CTE) programs of study. With a focus on systems alignment and program improvement, Perkins is critical to ensuring that programs are prepared to meet the ever-changing needs of learners and employers. As the eligible state agency and recipient of the Perkins funds, RIDE supports numerous career preparation programs that are in alignment with the Governor’s Workforce Board list of High-Wage, High-Demand Industries, including bioscience, business, construction, defense, information technology, education, healthcare, hospitality and tourism, manufacturing and marine trades. CTE is part of PrepareRI, a statewide initiative to build industry-aligned career pathways for all Rhode Island youth, which includes providing work-based learning opportunities. The goal is to improve youth career readiness, while simultaneously closing the employment gap in the state. Federally-mandated secondary student program outcomes include math, reading/language arts and technical skill attainment, and program completion, graduation, and placement in postsecondary education/training, work and/or the military. Postsecondary and adult student program outcomes include technical skill attainment; program retention, industry recognized credential and degree earning (as appropriate); and placement in advanced education/training, work and/or the military.

**Vocational Rehabilitation (ORS):** The Vocational Rehabilitation Program (VR) is the federal government’s largest and most successful employment program for individuals with disabilities. The Office of Rehabilitative Services is Rhode Island’s administrator of the VR program and assists Rhode Islanders with disabilities to select, prepare for, obtain and maintain competitive employment.

Few other programs offer a holistic approach that advances empowerment, informed choice as well as a full range of services and supports that individuals with disabilities need to fully participate in education, training and employment. The program helps individuals with disabilities to obtain an integrated competitive employment outcome at or above minimum wage. Masters level Vocational Rehabilitation Counselors tailor services to the individualized needs of the person with a disability. Services may include: evaluation and assessment, vocational counseling and guidance, training, assistive technology, job development and placement, including services that support individuals with disabilities to obtain and keep jobs. The objective of the program is to assist individuals with disabilities to become successfully employed in a job that matches the individual’s skills, abilities and interests.

In federal fiscal year (FFY) 2010 due to retirements, budget constraints, promotions, sick leaves, and workforce reductions, ORS implemented an Order of Selection that involved prioritizing services to Category I individuals with the most significant disabilities.

- First priority will be given to consumers with the most significant disabilities or consumers classified in the Order of Selection as Category I. This category refers to a consumer who has a most significant disability if a mental or physical impairment exists that seriously limits four or more functional capacities in terms of an employment outcome and whose vocational rehabilitation requires multiple services over an extended period of time.
• Second priority will be given to consumers with significant disabilities. A consumer has a significant disability if a mental or physical impairment exists that seriously limits two or three functional capacities in terms of an employment outcome and whose rehabilitation requires multiple services over an extended period of time.

• Third priority will be given to other eligible consumers who have a disability that seriously limits one functional capacity in terms of an employment outcome and requires two or more services over an extended period of time: Six months or more.

All Category II and Category III individuals were placed on a Wait List for services. When resources later became available, Category II eligible clients were been moved off the wait list. However, at the conclusion of FFY 2017, ORS was confronted with additional budget constraints, increased costs of services, and agency obligations to comply with a Department of Justice Consent Decree. ORS requested $5,000,000 in reallocation VR funds but only received $532,198, as a portion of the funds was used to assist states impacted by hurricanes and other weather events. The culmination of these factors is impeding the Agency’s ability to provide services to all eligible individuals with the most significant disabilities, thus necessitating closure of all categories in the Order of Selection. This closure remains in place as of the issuance of this document.

**Job Corps:** Rhode Island has has one Job Corps location in Exeter, Rhode Island. Job Corps is a federally-funded program under WIOA that provides free education and training to young adults (16-24 year olds). Eligible youth are able to earn a high school diploma or high school equivalency diploma and receive life, soft, and occupation skills training. Job Corps regularly participates in local youth job and career fairs. The state continues to build relationships between the netWorkRI career centers, youth service providers, and Job Corps.

**Associate Programs – Partner Agencies**

Alongside federally funded workforce programming, core partner agencies manage and administer a range of state and/or hybrid funded programs. Many of these programs are overseen by the State Workforce Development Board and are strategically aligned and integrated with core and non-core WIOA programs and providers. The goal is a seamless and unified workforce network that leverages state, federal, and hybrid investments to meet employer demand and create pathways to employment for Rhode Islanders.

**Industry Sector Workforce Partnerships – Real Jobs RI (DLT):** Real Jobs RI is the state’s sector-based workforce development initiative that ensures workforce solutions are driven and developed by actual employer and industry needs. Real Jobs RI connects employers with industry intermediaries such as a trade association, nonprofit, or university, who acts as a convener, bringing together companies with similar workforce challenges to create innovative and impactful solutions. Solutions include, but are not limited to: recruitment and training of new hires, re-skilling of incumbent workers, and activities focused on the future workforce such as youth career readiness programming.
Community-based Workforce Partnerships – Real Pathways RI (DLT): Real Pathways RI is the state’s community-based workforce program that supports partnerships between and among public, private, and nonprofit agencies that focus on serving populations with barriers to employment (ex. veterans, homeless, long-term unemployed) or regions of the state with above average concentrations of unemployment. Lead by a convener, these partners collaborate to provide workforce development services that are demand-driven, linked to the larger workforce network, and designed to maximize the opportunities for middle class employment.

Youth-Focused Workforce Partnerships – Real Skills for Youth (DLT): The Real Skills for Youth program funds strategic partnerships among schools, youth-serving organizations, industry, and others to develop and implement high-quality paid work-based learning activities and college and career readiness programming for youth. Real Skills for Youth is built off the long-standing Summer Youth Employment program to enhance and scale work-based learning opportunities for youth, and more tightly connect work-based learning to year-round college and career readiness programming, by supporting partnerships between industry and education.

Incumbent Worker Training Grants (DLT): Employers often need to train and re-train their current workers to remain competitive. When workers lack necessary skills; an employer’s ability to expand and grow may be compromised. The Incumbent Worker Training Grant Program addresses this issue. The Program provides grant funding for continuing education, training, and upskilling of incumbent employees at existing Rhode Island employers. The program provides matching reimbursement grants of up to 50% to employers that pay for preapproved, direct, training-related costs. Grants are available up to $50,000.00.

Subsidized Temporary Work Experiences – Work Immersion (DLT): For recent high school or college graduates, it can be difficult to build such experience from scratch once they enter the job market. While for out-of-work job seekers; lengthy periods of unemployment and gaps in their work history may cause an employer to hesitate in hiring. Work Immersion is designed to boost the employment prospects of new and returning workers while opening new and diverse hiring channels for employers by offering up to 50% wage subsidy to any RI business that provides a temporary paid work experience to a RI-based students or unemployed adults.

Apprenticeship Development (DLT): Apprenticeship is a tried and true training model that is increasingly receiving a second look in today’s economy. The ability to ‘learn and earn’ through apprenticeship is mutually beneficial to employer and employee. The Non-Trade Apprenticeship Development program provides development funds to organizations throughout the state to create new and innovative apprenticeship models outside of the traditional trades. The Non-Trade Apprenticeship Incentive program offers an incentive of $1,000 per non-trade apprentice provided the apprentice is registered with the State Apprenticeship Office and has completed their required probationary period.
**PrepareRI (DLT and RIDE):** PrepareRI is Rhode Island’s 3-year action plan, to ensure all Rhode Island students are college and career ready by graduation. PrepareRI aims to close the gap between what students learn in school and what they need for high-demand jobs, and to ensure that historically underserved student populations have expanded access to quality career preparation opportunities in priority sector industries – through scaling out activities such as career exploration and work-based learning opportunities. The effort is supported by a $2 million New Skills for Youth grant from JP Morgan Chase.

**PrepareRI Internship Program:** The PrepareRI Internship Program places Rhode Island high school juniors in paid summer internships with the state’s top employers in a range of industries. PrepareRI Internships benefit both students and industry. For students, the internships prepare youth with the skills they need to pursue meaningful, fulfilling futures through professional skills training, on-the-job experience, and connections to adult mentors who can help them achieve their career goals. For employers, the internships help diversify their workforce and build a strong pipeline of young, skilled workers who can keep RI’s future economy vibrant and strong. Summer 2018 was the pilot year for PrepareRI Internships, when 162 students were placed in high-quality internships; the program doubled for Summer 2019 with over 300 participants. Over 50% of interns are from priority schools in underserved areas.

**Associate Programs – Other Agencies**

**Department of Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH):** BHDDH partners with licensed Behavioral Health Organizations (BHO), which focus on mental health and/or substance abuse disorders, and Developmental Disabilities Organizations to provide supportive employment services to clients. Community based organizations (CBO) network with local businesses to develop relationships and build a referral/job pool.

- Developmental Disability Organizations (DDO): Individuals eligible for services through the Division of Developmental Disabilities are assessed and authorized a level of services and are able to choose from 34 licensed developmental disability organizations to provide these services or individuals may choose to “Self-Direct” services and hire employees to work directly for them to provide services. Supported Employment Services are included in an array of 24 services, specifically the services include job development, job coaching and job retention, as well as vocational assessments and training.

- Community Mental Health Center (CMHO) Employment Supports: Activities to support employment for Severely Mentally Ill (SMI) clients of the Community Mental Health Organizations include a variety of client-specific supports to prepare them for work, including coaching their job search efforts and supporting job retention by helping individuals to overcome the barriers presented by their illness. Services are delivered either by certified Supported Employment Specialists or by Certified Community Support (CSP) Case Managers. Although specific outcomes are not required as a condition for funding, and access to Supported Employment Services is just one of the variables determining whether CSP clients get and keep employment, the goal of the service is to increase the number of clients in competitive, gainful employment.
**Department of Children, Youth and Families (DCYF):** RI DCYF was established by the RI Legislature in 1980 by merging children’s programs previously administered by four different state agencies. The director of DCYF is also a member of the RI Children’s Cabinet, which addresses cross-departmental issues relating to children’s needs and services. Rhode Island is one of a small group of states that integrates the three major public responsibilities for troubled children, youth and families in one agency: Child Welfare, Children’s Behavioral Health and Juvenile Corrections. DCYF provides a series of educational and training programs to adjudicated youth at the Thomas C. Slater Training School. Educational services include special education, regular education, ABE, training and post-secondary classes.

**Department of Corrections (DOC):** The Education Services Unit within the Department of Corrections, in partnership with RIDE and DLT, administers programming ranging from Adult Basic Education, English as a Second Language, Special Education, Inmate Literacy Programs, GED classes and testing, post-secondary programs, and occupational/vocational training programs.
B. The Strengths and Weaknesses of Workforce Development Activities

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

Strengths

Rhode Island’s workforce network has many strengths. Most prominent is the state’s aggressive transformation into a business and industry driven model. The services and activities to unemployed, underemployed, and businesses outlined above are informed by, and designed to reflect, local and statewide industry demands. Much of this transition toward has been aided by the state’s “Real Jobs RI” industry sector partnership initiative. One of Governor Raimondo’s hallmark education and training efforts, Real Jobs RI brings employer knowledge and expertise to the table in a way that can transform and improve the workforce system now and into the future. The program connects employers with intermediaries such as a trade association, nonprofit, or university, who then acts as a facilitator between the state and the industry - bringing together smaller companies that have similar workforce challenges to create innovative and quick solutions. Practical solutions include but are not limited to: recruitment and training of new hires, re-skilling of incumbent workers, and activities focused on the future workforce such as youth career readiness programming. Importantly, these partnerships also function as sophisticated, real-time, workforce intelligence aggregators that work directly with the state workforce system to disseminate actionable information, detail emerging workforce trends, articulate skill requirements, and design solutions to meet them. The effort places industry need as the ‘center of gravity’ around which the disparate parts of the workforce network can align and coordinate, transforming the workforce network over time toward a responsive and effective source of talent.

A second strength of the workforce network is the diverse spectrum of programming the state is able to offer to both job seekers and businesses. Aligning state, federal, and private/non-profit programming, the state workforce network has built a continuum of workforce development programs that assist Rhode Islanders from youth to, and throughout, their career. While each of these components have separate programming goals and means of delivery; all have elements of academic advancement, skill building, and employment as part of their mission.

By focusing essential skill building and digital literacy, work-based learning and work experience opportunities, high quality career counseling, apprenticeship development, and incumbent worker training, Rhode Island offers a responsive workforce development network that is as well prepared to connect Rhode Islanders to their first career as their next one. For employers, the network offers an array of services that assist a business at nearly every step of the career path and rung of the organizational ladder from industry awareness for future workers, to recruitment and training for new hires, to incumbent worker training and upskilling opportunities for current workers. The state has worked hard to position the workforce development network as an extension of a businesses’ own Human Resource office- delivering the right solution at the right time.
A third strength of workforce development network is the degree to which it is aligned with the state’s economic development efforts. DLT Business Service experts are co-located within the state economic development agency – bringing firsthand knowledge of available workforce development programming to conversations with new or growing Rhode Island businesses. Marketing, collateral, and other related literature within the economic and workforce development spheres are reviewed for consistency and accuracy to convey a sense of seamlessness to employers. Through the afore-mentioned Real Jobs RI program, economic and workforce development decision-makers and activators have a source of actionable business intelligence and can quickly deploy resources to grow or preserve jobs. In the coming years, Rhode Island will continue to increase the level of integration between the state’s economic development efforts and other partners within the workforce network - leveraging this relationship as a critical strength for the state.

Weaknesses

There is room for improvement in all things and the Rhode Island workforce network is no different. Despite its progress in shifting toward a demand-driven model; the state workforce network continues to suffer from a lack of name recognition with both jobseekers and business. The lack of a unified language and ‘brand’ makes it difficult for the system to communicate its message to the public. Failure to unify marketing and outreach leads to duplication, confusion, mixed messaging, and, potentially, information overload for employers and job seekers. Lack of alignment in marketing and outreach reflects a continued lack of alignment in service delivery as well. Workforce development programming remains highly fragmented; while each program retains its own distinct, and often incongruent, set of rules, regulations, limitations, and priorities. At the same time, multiple entry points exist for job seekers and employers that increase the risk of customer confusion and detachment. While some of these regulatory and policy differences can be addressed at the Cabinet or senior-manager level (such as the previously mentioned Interagency Coordination Workgroup) a major challenge remains in transforming the integration of services with the state’s netWORKri one stop career centers. ‘One-Stop Career Centers’ are intended to provide a full range of assistance to job seekers under one roof. Client need and expectations often extend even further with many hoping to access human service programs and even legal services within the confines of the One Stop center. Enhancing the presence and accessibility of human service providers and agencies with the capacity and ability to meet these needs would enhance the ability of One Stop staff to focus on their greatest strengths, career counseling.

This lack of alignment exists in the youth sector as well, and the State needs to better connect the Youth WIOA program to state youth investments in PrepareRI and Real Skills for Youth under a unified theory of action to provide a seamless experience for youth participants. Federal and state-funded youth programs have thus far existed in silos, and this plan provides an opportunity to better connect the providers and programs so that all youth have access to the same experiences. Youth participants also need a wider array of options when it comes to entering in-demand career pathways – the state is working to more intentionally connect youth participants to existing sector-based job training programs, while providing the supports needed to meet the unique needs of this population.
A third challenge, and one that may be surprising given the state’s small size, is the difficulty in meeting the needs of job seekers in all geographic regions of the state. Despite Rhode Island’s diminutiveness, most training and educational services are concentrated in the north-south corridor between Woonsocket and Providence. Very few assets and resources are located in the western and southern regions of the state for adult education or case management, although occupational skills training is somewhat more broadly available. The state’s public transportation system utilizes a ‘hub and spoke’ model that relies heavily on inward and outward travel to and from the capital city – this model makes it difficult for many users, but particularly suburban and rural users, to rely on public transit as an efficient means to access services.

The “benefits cliff effect” is a growing concern for DHS families due to the rising costs of living, especially housing. This cliff effect happens when benefits decrease or phase out rapidly due to a household’s earnings increase. One month a family can be receiving a benefit and the next month it could all be gone due to employment. This abrupt loss or reduction in benefits can be very difficult for families, because even though they have increased household income, these earnings are not usually enough for the household to be self-sufficient. Households may lose or see a reduction in key supports such as RI Works cash assistance, SNAP and childcare. Because these RI Works families who gain employment are seldom prepared for even one crisis, a sick child or a car needing repair could disrupt success with recent employment.

Rhode Island is focused on childcare reauthorization at 12 months and ways to engage families with greater consistency. Families need to provide reasoning and support to access childcare funds for an appropriate activity related to jobs or training. RI is trying to implement tired childcare reimbursement, and child care expansion to include post-secondary learners. Vendor contracts for TANF include supportive services paired with work activities and provide forward thinking programing, to assist parents once they leave cash assistance to create planned and suitable relationships with housing and mental health community services.

A final weakness of the workforce network relates to a lack of consistency in service delivery. It remains a fact that the service quality, and the range of assistance a client may receive, depends in large part on whether the counselor/staff they sit before is a seasoned veteran state employee, or a new hire only a few days/weeks into the job. There are opportunities, such as establishing joint counseling standards, creating more comprehensive standard operating procedures (SOPs), and enhanced training, to promote more consistent and high-quality service delivery. For example, DHS and DLT workers were recently cross trained in trauma informed case management and coaching with motivational interviewing to better serve Rhode Islanders. Examples of best practices exist, but Rhode Island needs to take these best practices and identify how, or if, they can be replicated throughout the state.
C. State Workforce Development Capacity

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

The three state agencies that house core WIOA programs continue to identify more avenues for collaboration. Resource allocation, service gaps, reduced duplication of services, and alignment of processes are all priorities designed to improve efficiencies and decrease waste.

The Department of Labor and Training (DLT) fulfills a coordination role through its role as home and staff to the state workforce development board and through the provision of labor market information for use across the workforce system. DLT also houses the state Apprenticeship office, Unemployment Insurance office, and provides programmatic support for Titles I and III of WIOA, as well as compliance oversight and financial administration for all six functions.

The Department of Education (RIDE) provides oversight and programmatic support for Title II programs throughout the state. RIDE is working to create better connections with local workforce development areas and strengthen collaboration with local workforce development boards.

The Department of Human Services (DHS) provides oversight and programmatic support for Title IV programs throughout the state, and is also the state administrator of the Temporary Assistance for Needy Families (TANF) program, called Rhode Island Works (RIW).

**Department of Labor and Training**

Title I: Youth Program- In PY 2018 (July 1, 2018 - June 30, 2019) WIOA Title I-B served 462 individuals in the Youth Program. The Title I Youth program utilizes multiple providers throughout the state and has good geographic representation.

Title I: Adult and Dislocated Worker Programs- In PY 2018, over 850 clients were served through the WIOA Title I-B program, with 381 receiving staff-assisted services in the Adult Program and 469 in the Dislocated Worker program.

Title III: Wagner-Peyser Employment Services- In PY 2018, the Wagner-Peyser Employment Service served 5,351 individuals.
Department of Education

Title II: Adult Education - RIDE’s Office of Adult Education currently funds 20 local providers under WIOA Title II to provide adult education instructional services in both of Rhode Island’s local workforce areas. Adult education services are provided by a variety of agencies: the state’s community college, the state’s four-year college, a public library, 14 community-based organizations, two school districts, and the state’s correctional system. Rhode Island’s Adult Education System Annual Capacity:

- 20 currently funded adult education providers;
- Classes offered at over 74 sites across the state;
- 294 adult educators; and
- 737 students on waiting lists statewide (as of December 2019).

Note: Providers document the number of adults unable to access services due to lack of program capacity using RIDE's online waiting list tool.

Office of Rehabilitative Services through the Department of Human Services

Title IV: Vocational Rehabilitation - The VR program can be accessed at four locations across the state, and employs approximately 40 counselors and 11 program support staff. Services are provided statewide to clients through a contracted service delivery system. The VR program provided services 2,612 individuals in 2019. These individuals have been determined to be significantly disabled and are eligible and able to receive services under an Order of Selection. Since 2009, only individuals who are determined through the eligibility process to be a person with a most significant disability (Priority Category One) are able to receive services, all other eligible persons with disabilities are placed on a waitlist. Priority Categories Two and Three have remained closed since 2009. As of October 2019, approximately 1,150 persons with disabilities across the state of Rhode Island were on a waitlist, waiting to receive the services necessary to help them become a part of, or remain, in the workforce and approximately 600 persons with disabilities were taken off the wait list. The VR program provides all individuals on the waitlist with resource and referral information to access other state-provided employment services.
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.

In her 2019 Inaugural Address, Governor Raimondo declared: “We won’t stop until every Rhode Islander has a shot at a good paying job. Our world is changing so quickly. This change requires all of us to be lifelong learners. No matter who you are, where you come from or what point you’re at in your career, you deserve access to job training, an apprenticeship, and education that will help you get ahead in whatever field you choose.”

The Governor’s challenge envisions a Rhode Island where individuals from all income and skill levels, no matter their present circumstance, can rise up the career ladder and improve the economic circumstances for themselves and their families. In the process, Rhode Island employers receive a distinct competitive advantage in the form of a vibrant and talented labor market from which they can draw.

2. Goals

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

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

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

** Veterans, unemployed workers, and youth and any other populations identified by the State.
In order to fulfill this vision, the following goals have been developed based on the labor and economic conditions of our state, future needs of industries, and the strengths of the workforce network. All programs within the state workforce network have committed to these goals, each playing their own respective role within the larger mission. Attaining these goals will not be possible without making significant strides in services to all customers, including youth and individuals with barriers to employment. Collectively, these goals create a focus on guiding all Rhode Islanders towards success in the state’s economy.

**GOAL 1: Implement a demand-driven, sector-based strategy to meet employer demand and establish a pipeline of skilled workers for future demand**

Through initiatives such Real Jobs RI (the state’s industry-sector workforce training program), as well as the Industry Partner program that predated it; the state workforce development network has built a strong foundation of high capacity, responsive sector partnerships that have been launched, expanded, and sustained throughout the state. With this foundation, the state is well positioned to take our business and industry sector engagement to the next level. Our first goal is to see the continued evolution and elevation of state sector partnerships – increasing their profile and recognition within their respective industries; increasing the scale and reach of their workforce programming and connecting with a greater share of the state workforce development network. This includes working with our local boards to build linkages between sector-driven job training activities and Title I funding for Adults and Dislocated Workers. We further recognize the importance of connecting our sector partnerships with in-school and out-of-school youth programming, particularly in the provision of work-based learning opportunities. Lastly, we seek to strategically integrate employer and industry outreach across Core and non-Core WIOA programs to maximize resources and reduce the administrative burden (perceived or real) on employers. All of these demand-driven efforts will be done with using the ‘Rhode Island Innovates’ analyses as a guidepost; leveraging the resources state workforce network to help grow and expand the opportunity growth areas as identified in the state’s economic strategy.
GOAL 2: Advance a career pathway strategy to provide employment, education, training and support services for individuals, particularly those with barriers to employment (including TANF recipients), that will ensure an opportunity to develop their education and skills to prepare them for a job at various points in their life.

Despite declining unemployment rates, several thousand Rhode Islanders, particularly those with barriers to employment, are unable to contribute their skills and achieve economic self-sufficiency. For this reason, Rhode Island seeks to engineer a comprehensive career pathways strategy which starts with in-demand occupations that pay a family-sustaining wage and works backwards to meet and assist job seekers wherever they are on the career ladder - no matter their economic circumstances or skill level. Such a strategy requires that all partners within the workforce network communicate, align, and scaffold programming in a sequence of supports, education, training, and career services designed to not only deliver a positive outcome to the individual upon completion, but sets them up for continued economic and career success in the future.

For youth, this vision is built on a theory of action that moves young people along a career pathway through meaningful career exposure and exploration of potential career paths and their on-ramps, skill-building with an emphasis on essential and professional skills, and supported work-based learning experiences that allow participants to apply learning in a real-world setting.

Achieving this goal requires a system that is able and ready to support Rhode Islanders from basic education, to postsecondary education, to training, and to family-sustaining employment and beyond. To that end, this plan seeks to build an integrated network of programming that improves job seekers’ academic skills; supports the simultaneous educational and skill achievement of parents/caregivers and children; enhances job seeker workforce readiness including digital literacy skills; assists job seekers (including individuals with disabilities, veterans, and other populations facing persistent barriers to employment) to achieve economic self-sufficiency; and maintains ongoing services to assist job seekers as they continue up their career path. This effort also requires the strategic coordination of support services and benefits programs such as food, housing, and cash assistance to maintain stability as job seekers progress through career development programming.

The cash assistance received by RI Works families provides a small but valuable resource that is the households financial foundation. With this financial foundation, RI Works parents can then take advantage of the opportunity to receive appropriate training that assists with preparation for employment. This training could include basic education, vocational training, on-the-job training, or postsecondary education. Childcare is offered so that parents can focus on making the most of their career opportunities, with the goal of obtaining employment that will sustain their family.
Lastly, an effective career pathways strategy is one that promotes excellent customer service and positive client interaction. All clients of the workforce network deserved to be treated in a respectful and helpful manner that recognizes that all Rhode Islanders have something to contribute to the state and its economy.

**GOAL 3:** Align policy and leverage existing government structures and resources so that government is “networked” and coordinated to achieve efficiencies and effectiveness throughout the workforce system.

To maximize our collective impact, and enhance the value derived by our business and jobseeker customers; the workforce development network must effort to organize and deploy our services as a single unified effort wherein customers engaging with one component of the workforce network engage with the entirety of the workforce network. Such front-facing coordination can help align and better leverage resources, increase efficiencies and reduce duplication of effort, and potentially increase the reach of the workforce network.

For front-line integration and alignment of services to succeed, it must be buttressed by increased coordination among data systems, policymaking, and funding. As mentioned in the ‘Strengths and Weaknesses of Workforce Development Activities’ section of this plan; there is strong need for great collaboration and coordination among partner programs. From state-level leadership to front-line staff; all levels of the workforce network must work toward system alignment. This will include a heavy emphasis on professional development and cross-training among and between programs, as well as tactical blending and braiding of funding around the needs of the client.

**GOAL 4:** Use data to inform policy-making decisions, guide investments and evaluate performance to measure return on investments

Rhode Island’s workforce network has made great strides in recent years in the gathering, analyzing, and disseminating of workforce development data. An extensive and robust data network has been built that is capable of providing critical programmatic and performance answers; the next step is to determine the right questions. As Rhode Island continues to revamp and revitalize the workforce development network, enhancing the capacity to effectively measure the success of such interventions becomes imperative. Such measurements around the mechanics and effectiveness of an intervention provides policy makers the information necessary to determine the success of the program and effects future investment decisions, while also demonstrating the far-reaching and sometimes unanticipated impacts of our efforts.

Rhode Island’s effort on this goal will be two-fold; first, the state seeks to manage WIOA’s core measures of performance in a more intuitive way, striving to not only ‘query and submit’ to meet performance requirements, but actively observe trends, swings, and deviations with the data to try to anticipate opportunities, and head off challenges.
Secondly, Rhode Island continues to consider additional output measurements and more precise outcome based measurements in order to better understand the workforce network’s efficacy on the state’s economy. These measures and others like them will be managed at the state level access programs, providing decision makers a clearer understanding of the effectiveness of the interventions provided.

**TARGETED POPULATIONS:** In addition to these system-wide goals; Rhode Island will continue its efforts to serve individuals with barriers to employment. Rhode Island has made it a priority to increase services levels and quality for individuals with barriers, including English language learners, persons with disabilities, current and former foster youth, TANF recipients, and veterans, among other groups. Rhode Island has utilized, and will continue to utilize, the following strategies for identification, outreach, recruitment, and service delivery for individuals with barriers to employment:

- **Data Integration and Quality** – Work is ongoing to better securely connect the disparate data management and reporting systems across respective agencies to more accurately gather and report service levels for persons with barrier, and lay the foundation for shared service and braided/blended funding.

- **Streamlining Outreach and Intake** – Partners continue to strategize on how to maximize customer value and minimize waste, when possible, through shared outreach, recruitment, and intake of populations with traditional barriers to employment.

- **Partnerships** – Effectively serving our state’s most vulnerable populations requires strong, effective working relationships, and shared resources, between and among the programs and agencies that make up Rhode Island’s workforce development network. Through initiatives such as the afore-mentioned Real Pathways RI program, RI Works and others - state staff has worked, and will continue to work, to foster community partnerships in order to build referral systems and collaborative service delivery platforms that allow for quality wraparound services and employer-driven career services.

### 3. Performance Goals

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

To be included with Plan upon submission.
4. Assessment

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

The primary indicators of performance for WIOA core programs measure the ‘fundamentals’ of workforce system effectiveness. Recordings of how many participants enroll and finish the program, their employment status after exiting the program, their annual salaries after exiting the program, and whether or not they have obtained post-secondary diplomas or certificates, along with employer effectiveness measures (in 2018, Rhode Island selected “Retention with the same employer” and “Employer Penetration Rate” as our measures of Employer Effectiveness) – serve as a sort of ‘health check’ of the system, and bring to light any structural flaws or impediments that should be addressed. However, their efficacy in measuring whether the state is meeting its economic and labor market goals are limited.

For this reason, Rhode Island continues to explore and develop additional program measures to compliment those required by WIOA. For example, to better gauge whether we are helping job seekers, particularly those with barriers to employment, improve their economic position and build stability; Rhode Island is considering measures such as wages and employment status prior to program entrance” which can then be compared to wages and employment after exit and better measure the impact the state’s intervention had on the individual’s economic situation.

Equally important to what we measure is how we measure it. Rhode Island’s performance data analysis continues to be siloed across agencies. Yet if we truly wish to measure the collective impact of the network on Rhode Islanders, and whether, together, we have positioned out clients for lifelong success; we need to be able to track clients across programs. Doing so not only tells the full story of our collective efforts; it helps to inform how well, or how poorly, we are preparing clients for each other’s programs and opens the door to greater program alignment and integration.

To gauge whether our workforce development network is helping advance the state’s economic development aims; the state plans to build on work that is already underway within certain programs already overseen by the State Workforce Development Board. Beyond measures of input or output, these approaches focus on outcome-based metrics, and measures of scale, that help paint a more complete picture of a program’s effectiveness in meeting the needs of industry sectors. Deliberate tracking and analysis of what business, industries, and sectors job placements are occurring will help inform and determine whether our collective efforts reflect the priority sectors identified in this plan. By recording the sum of positions filled across multiple businesses in a sector, a better understand of whether meaningful changes to the state’s economy have taken place will emerge. This also helps the state make the ‘value proposition’ of our investments to specific industries and describe how our efforts are making a difference.
Although WIOA does not mandate such rigorous measurement requirements, Rhode Island believes proper and precise outcome based metrics lead to a greater understanding of how programs affect our state’s economy. An important priority for the State Workforces Development Board is aligning agency and program goals with the economic goals of the state as outlined in this plan. As evident by the combined planning process, Rhode Island recognizes that it is the combined efforts of programs and services that truly affect change for clients and employers in the state. These reporting mechanisms will allow the agency to use recorded data to improve program operations, evaluate programs impacts on workers and employers while creating a funding feedback loop. By using evidence based outcomes the state can gather real-time information on what aspects of services and programs are effective in employment interventions which, in turn, will affect funding allocation. By taking this initiative, Rhode Island will be the example of a laboratory of democracy that other states can use as an example in creating new workforce development programs.
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).

Sector Strategies

By the publication of this plan, Rhode Island’s industry-sector workforce development program, Real Jobs RI, will be entering its sixth year of operation. In that time, the program has grown to over 40 different public-private partnerships, covering 16 industries - defining common opportunities and challenges, and connecting with workforce, education, and economic development partners to create solutions that improve industry competitiveness. The partnerships funded through Real Jobs RI continue to frame the state’s economic and workforce development efforts, organizing and investing in key industries that are vital to our regional economy, including:

- Agriculture
- Commercial Fishing
- Commercial Shell Fishing
- Construction
- Defense & Cybersecurity
- Design
- Energy
- Finance
- Healthcare
- Hospitality
- Information Technology
- Manufacturing
- Marine Trades
- Medical Technology
- Social Enterprise
- Transportation and Logistics

As we look to the next four years, our focus is on continually enhancing and expanding the network of sector partnerships in Rhode Island. This effort includes linking a greater share of WIOA clients to the training and job placement activities these employer-driven partnerships create. To this point, much of the funding for these activities has been braided state and state-level federal dollars. Now that partnerships have reached a level of maturity, and their training activities have become more refined; Rhode Island will work with our local boards in helping Title I Adults and Dislocated Workers (and other clients as opportunities arise) access to these activities through customized training contracts and other mechanisms.
Rhode Island will also endeavor to help transition many of our sector partners to reach the ‘next level’ in their scale and capacity and become advanced sector partnerships. Such partnerships would remain employer-led, with agenda based on the needs of the industries they represent but would also expand to include addition additional public partners from throughout workforce development, economic development, education and others who will work together to convene and support the partnership. Advanced sector partnerships would pay particular focus on sustainability and the long-term vision and needs of their partner businesses and their surrounding community.

Transitioning to an advanced partnership model will mean growing the scope, depth and breadth of our sector partnerships. It will further present an opportunity to synergize the work of specific industry partnerships around the identified growth areas as identified by the ‘Rhode Island Innovates’ report.

**Career Pathways**

The goal of the sector strategy is to aggregate the needs to employers and provide a mechanism through which these needs may be clearly articulated to the workforce development network and others. This goal aims to help industries develop statements of need that translate into activities that meet those needs, such as recruitments, education, training, etc. A client-centered career pathway strategy compliments this effort by coordinating the services and resources necessary to connect individuals to the opportunities presented as a result of the work of the sector intermediaries. A career pathway is defined by WIOA as:

“A combination of rigorous and high-quality education, training, and other services that;

- Aligns with the skill needs of industries in the economy of the State or regional economy involved;
- Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937;
- Includes counseling to support an individual in achieving the individual’s education and career goals;
- Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
- Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
- Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
- Helps an individual enter or advance within a specific occupation or occupational cluster.”
The career pathway strategy is intended to identify the unique skills and assets within all Rhode Islanders, help those ready to be connected to the opportunities provided by the sector strategy find placements within sector-based training and employment openings, and prepare and support those who are not yet ready to take advantage of these opportunities to become so.

It is important to understand that career pathways are not linear, nor the opportunities presented under the sector strategy unattainable to those individuals with barriers to employment. In fact, sector strategies often result in diverse populations participating in the opportunities generated by the workforce intermediaries. The benefit of having a sector strategy is that it complements the career pathway strategy in that the workforce intermediaries are able to connect employers and workforce development partners directly. This provides workforce partners clear information about the requirements and skills needs of that industry, which lends clarity on who to refer to these programs. At the same time the intermediary can work with workforce partners to determine if any unnecessary barriers are being put in place by the industry (or by the agency itself) that are preventing quality applicants from being accepted. This potential ‘systems change’ is a key differentiator the sets advanced sector partnerships apart of the ‘industry panels’ of old.

Rhode Island’s vision and framework for career pathways is being developed by the State Workforce Development Board’s Career Pathways Advisory Committee and Education and Employment Advisory Committee. These bodies, comprised of representatives from the provider community, advocates, other state agencies, as well as WIOA core programs, seeks to develop career pathways for all Rhode Islanders by ensuring those who may have been disconnected from the workforce, education or training programs can connect to career readiness opportunities to ensure career awareness/exploration, academic/technical expertise and work-based learning experiences. The core values of this effort include:

- **Equity** – Respects people and cultures, values diversity, and is committed to equitable student-centered educational and economic opportunity.
- **Demand-driven** – Promotes workforce training programs that are responsive to employers and industry needs.
- **Client-centered** – Includes and centers the experience of job-seekers to ensure workforce resources are easily accessible.
- **Collaboration** – Works collaboratively and openly with diverse stakeholders to identify opportunities for alignment and leveraging of resources.
- **Quality** – Relies on data to measure the impact of workforce related programming and serves to hold workforce partners accountable for performance.
The theory of action forming the foundation of this strategy is that the state’s role in helping an individual achieve economic stability and employment is a staged approach that must first meet the individuals’ most basic needs before proceeding toward more employment-related outcomes. Failure to adequately address a job seeker’s need for housing, for example, seriously jeopardizes that individual’s ability to secure and retain employment, even if the program is initially successful in achieving a job placement. For that reason, this sequence of client need starts with assessing the individuals’ most fundamental needs and, if necessary, connecting them with human service and family stabilization assistance (such as mental health/substance abuse counseling, housing assistance, child care, transportation, SNAP, and other social assistance); as well as preliminary career services that will help transition them toward the next steps in meeting career goals, such as basic skills assessments, career guidance and counseling, and career services such as resume writing, interview skills and other general services.

Partnerships with DHS provide needed assistance for low-income families to be successful, barriers that impact the family must be addressed prior to considering employment needs. Housing and food insecurity, as well as lack of appropriate childcare, are some of the issues that low income families must resolve to be prosperous with their career pathway. Through SNAP, cash assistance, and the Childcare Assistance Program families can begin to stabilize. Partnerships are identifying and providing families access to needed supportive services, to enable all participants on a pathway toward a successful long-term employment outcome.

Mitigating hardship and helping achieve economic and family stabilization sets the client and the network for improved success as they transition to work readiness and technical skill building. From adult basic education, contextualized ESOL, and digital literacy, to integrated basic education and training, to occupational training leading to an industry-recognized credential; the guidance and supports that helped address the individual’s identified barriers continue as they jointly progress toward their employment goals.

For youth in particular, the goal is to prepare them for success in college and career through meaningful career exposure and exploration of potential career paths and their on-ramps, skill-building with an emphasis on essential and professional skills, and supported work-based learning experiences that allow participants to apply learning in a real-world setting.

Lastly, with a foundation of support and the acquired skills and knowledge gained through education and training; the network aids the individual in acquiring work experiences and employment. Employment is an important milestone, but the work is not yet done; as the workforce network continues to aide the individual in continuing the path toward economic self-sufficiency, aiding them with services such as benefit counseling and financial literacy, while continuing to offer education and training to help the individual earn more/move up in a career pathway.
It is important to recognize that this staged and successive supports model is fluid. While ideally, the network would ensure each level of need is completely satisfied and fulfilled before moving onto others; it is more accurate to view these levels as continuously overlapping each other. Doing so not only recognizes the reality of limited state resources and time; but also reflects the nature of the individual, for whom basic needs may take precedence back over employment goals at any point in time.

The goal of the Rhode Island career pathway strategy is to create a client-centered planning process that can be used by all entities that may contribute to the individual’s career and educational development. By creating uniform processes that encompass intake, referral, and service delivery across programs we ensure that all participating agencies have a defined role and how to execute those roles equitably. When a client comes to a one-stop career center for services, they should be welcomed and appreciated and should find atmosphere that inspires confidence and motivates. They should also be able to move seamlessly through the frontline staff that represent separate agencies as if they are one single entity and not multiple entities working through collocation. Since no one agency has the ability to meet every need of any given client it is crucial that systems flow smoothly into each other between programs. The flexibility of WIOA and the nature of combine planning allows us to create a career pathway strategy that is facilitated and operated by all participating agencies, intermediaries, and frontline staff.

Due to the unique characteristics of each individual, the needs identified and the expected timeline for meeting those needs will vary depending on the individual. In addition, the career pathway planning should continue to evolve as clients experience success or if a client needs to adjust their goals and needs. Once the client’s goals and needs are identified, the client should work with service providers to develop a financial plan that allows immediate needs to be met while supporting the individual’s progress on meeting their longer-term goals. This plan may incorporate topics such as planning around expected unemployment insurance payment, financial assistance for college classes, the cost of training, childcare, or other topics. Once the financial needs of the client are understood the counselor can recommend an appropriate combination of services, training, and education to assist the client in meeting their needs in a financially sustainable way and refer the client to other professionals to assist them in accessing services.

While a single program staff may be unable to determine client eligibility for other programs, the client-centered network will provide access to other program staff directly in order to quickly gain a response from a partner program about the eligibility of the client for additional services or resources. The financial and programmatic resources received by the client should support all aspects of the individual’s career pathway plan.

By having the client complete a goal setting and needs assessment exercise, the service provider can determine what referrals should be made to connect the individual with additional resources and subject matter experts that can further help provide direction and assistance to the individual. For example, a client who is finishing an adult education program and has obtained a GED may be looking to participate in a sector-based training program. The adult
education provider may refer the individual to the American Job Center where the individual can be connected to the workforce intermediary providing the sector-based training program, who in turn may connect the individual to the financial aid office of the local community college if college coursework is an element of the training program.

This approach recognizes that no single entity has all the information a client may need and that the comprehensive career pathway planning will need multiple contributors who will help bridge the client's current situation to the next step in connecting the client to the next area of information or service. Again, a collaborative network government approach will allow entities in the workforce network to remain true to their core missions while assisting the client to connect to the services and resources needed. To that end, the afore-mentioned Real Pathways RI partnerships; offer a unique opportunity to provide blended support and career services in the community. Much like the Real Jobs RI partnerships; funding for these partnership activities has been predominately state and state-level federal dollars. Now that partnerships have reached a level of maturity, and their training activities have become more refined; Rhode Island will work with our local boards in helping Title I Adults and Dislocated Workers (and other clients as opportunities arise) access to these activities through customized training contracts and other mechanisms.

Such opportunities and resources will be combined in such a way as to maximize the individual’s competitiveness, so they can successfully compete to achieve their career goals. This career pathway strategy will be used for WIOA clients initially, however, this tool can be adopted in other programs including, secondary and post-secondary institutions. Because career pathway planning reflects the individual’s specific goals and needs, the appropriate combination of services is not limited and can be used for any population. In addition to being versatile for different client types, this plan can also be used to coordinate service delivery across programs and service providers.

**College and Career Focus**

As previously mentioned, Rhode Island Governor Gina Raimondo announced an ambitious goal to ensure that 70% of working-aged Rhode Islanders hold some form of post-secondary credential by the year 2025. Based on national data as well as state labor market projections, the Governor found that nearly seven out of ten jobs created in Rhode Island over the next decade will require more than a high school diploma. Reaching this ambitious goal will require an ‘all hands on deck’ effort, and WIOA clients such as adult learners and job seekers will be an essential area of focus.

Rhode Island’s career pathways strategy takes an individualized approach to career services that will be built around whatever strategies are most effective in helping the client meet their own career goals. For those for whom completing their education and securing a degree is part of their personal and professional goals; WIOA is an important tool that can help aide in that effort. Although WIOA does not prioritize college degree completion as a direct goal, we nonetheless recognize the value of college completion to an individuals’ employability and to the overall economy, as well as the critical role that WIOA could play in helping individuals meet their aspirations.
Automation and Artificial Intelligence

Any comprehensive workforce development strategy written in the year 2020 would be incomplete if it did not acknowledge the challenges and opportunities presented by advancements in automation and artificial intelligence. As referenced by a 2019 Government Accountability Office report (https://www.gao.gov/assets/700/697353.pdf); advances in automation and artificial intelligence, while potentially providing immense economic and societal benefit such as improved delivery of healthcare, and safer and more efficient transportation, among other benefits; could also dramatically alter the employment landscape for millions of Americans. Some estimates state that over twenty-five percent (25%) of jobs within the economy today could be at-risk of automation and/or replacement by artificial intelligence in the coming years (see: https://www.usnews.com/news/economy/articles/2019-01-24/report-one-quarter-of-us-jobs-are-at-risk-for-automation).

Rhode Island’s proactive response to these advancements is evident within the ‘Rhode Island Innovates’ economic strategy and is woven throughout this workforce development plan. Focusing on growing industries and subsectors determined to be at comparatively less risk of automation (including, but not limited to: Advanced Business Services and Arts, Education, Hospitality, and Tourism), while at the same time supporting those industries that stand to benefit most from these technological changes (including, but not limited to: IT / Software, Cyber-Physical Systems, and Data Analytics, and Biomedical Innovation) offers Rhode Island the chance to take advantage of the opportunities presented by automation while guarding against the anticipated risks. Aligning this workforce development plan, and resultant training and employment programming, with that economic strategy; while continuing to build a service network that can quickly and efficiently prepare individuals for new career opportunities and effectively leverage economic supports for individuals in need, provides a platform upon which Rhode Island can prepare for economic shifts brought about by automation and artificial intelligence.
2. Describe the strategies the State will use to align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available to the State to achieve fully integrated customer services consistent with the strategic vision and goals described above. Also describe strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2).

The strategies described below are flexible and designed to allow the workforce network to nimbly respond to opportunities or challenges within the economy and labor market as they arise. As sector partners continue to evolve and identify needs; the larger workforce network, including all programs contained in this plan, will be able to respond accordingly and create more informed policy and investment decisions. As the workforce intermediaries grow in capacity and organize more of the employer demand for workforce, the larger workforce related programs will align with each other to ensure greater connections to industry partners and to scale up existing efforts to complement the increased capacity of the intermediaries. This relationship creates a sustainable cycle of improving program alignment with aggregated demand where employer participation in intermediary partnerships increases the information available regarding employer demand to diverse entities, who are able to respond more effectively to employer demand, while achieving improved outcomes for the individuals they serve.

GOAL 1: Implement a demand-driven, sector-based strategy to meet employer demand and establish a pipeline of skilled workers for future demand

Strategy 1.1 - Continue to invest and support growing industry and sector partnerships, with a focus on supporting and enabling the growth areas as identified by the ‘Rhode Island Innovates’ report.

Strategy 1.2 - Work with local boards on integrating Title I training and career services funds into sector partnership activities, and providing access to employer-driven activities to Adult and Dislocated Worker clients.

Strategy 1.3 – Support the organization of advanced sector partnerships and expand strategic connections between partnerships and other agency partners within the workforce development network.

Strategy 1.4 – Enhance the alignment of business services across all partner programs and develop a unified ‘voice’ for branding, outreach, and awareness.

Strategy 1.5 – Work with sector intermediary partners to promote/encourage the adoption of competency-based hiring, education, and training to maximize opportunities for untapped talent to succeed in the labor force.
GOAL 2: Advance a career pathway strategy to provide employment, education, training and support services for individuals, particularly those with barriers to employment, that will ensure an opportunity to develop their education and skills to prepare them for a job at various points in their life.

Strategy 2.1 – In collaboration with local boards and WIOA partner programs, review policies and definitions around the provision of support services within Title I to maximize the depth and breadth of these services, taking into account services and resources that are already available among other partners and providers.

Strategy 2.2 - Collaborate across partner programs on a systemwide Community of Practice to work with providers, clients, employers, and advocates to jointly establish uniform statewide definitions and standards of quality for the workforce network.

Strategy 2.3 - Ensure adult education programs support target populations and are contextualized so adults increase education and are connected to post-secondary/industry credential and/or job.

Strategy 2.4 - Conduct analysis of summer youth employment and other work-based learning programs to determine strategies for a more demand driven approach, aligned with growing industry that enables youth to advance a career pathway.

Strategy 2.5 - Implement continuous (and, whenever possible, joint) professional development and customer service training for staff from all partner programs to elevate internal expertise and professionalism and to build a growing and shared knowledge base across programs.

Strategy 2.6 - Promote the adoption of 2-Generation models to combat poverty among all partners in the one-stop delivery system.
GOAL 3: Align policy and leverage existing government structures and resources so that government is “networked” and coordinated to achieve efficiencies and effectiveness throughout the workforce system.

Strategy 3.1 – Require each local workforce area to demonstrate success in community engagement and outreach including, but not limited to, partnering with community-based organizations, community leaders, and others to increase the awareness and availability of services beyond the One Stop location and within the community.

Strategy 3.2 – Conduct a comprehensive review of Rhode Island’s One Stop Career Centers using customer/human-centered design principles

Strategy 3.3 - Establish a statewide common assessment policy for foundational skills like basic literacy and numeracy.

Strategy 3.4 – Work with relevant state agency partners to provide clear and uniform guidance regarding the impact of service-related income and earnings on public assistance programs and increase the level of interagency communication regarding the impact of employment and earnings on individual’s client eligibility and benefit levels.

Strategy 3.5 – Explore the creation of a statewide electronic client referral system.

GOAL 4: Use data to inform policy-making decisions, guide investments and evaluate performance to measure return on investments

Strategy 4.1 – Wherever possible, transition program and performance reports into user-friendly online dashboards for the public to access.

Strategy 4.2 - Encourage cross-agency performance review and analysis for all WIOA programs at the state and local board level

Strategy 4.3 - Adopt system-wide outcome metrics to portray an accurate depiction of the workforce system, which will be used for planning and implementation of system services.

Strategy 4.4 - Explore additional ways to capture the Return on Investment (ROI) of the workforce system in order to promote the value of the system and all programs within it.
III. Operational Planning Elements
The Unified or Combined State Plan must include an Operational Planning Elements section that supports the State’s strategy and the system-wide vision described in Section II.(c) above. Unless otherwise noted, all Operational Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. This section must include—

A. State Strategy Implementation
The Unified or Combined State Plan must include—

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

The Governor’s Workforce Board of Rhode Island (“GWB” – the state workforce development board) is comprised of business, workforce, and government representatives from throughout the state who represent key industries and programs instrumental to the success of the public workforce development network. The GWB is administratively housed within the Rhode Island Department of Labor and Training and serves as a coalition of the state departments of Education, Postsecondary Education, Labor and Training, Rehabilitative/Human Services, and Commerce, with the balance of the board made up of public representatives consistent with the requirements of WIOA. All members are appointed by the governor.

The GWB is codified in state statute as the state’s primary policy-making body on workforce development matters. In that this role, the GWB oversees and coordinates both federal workforce development policy (through implementation of WIOA) and state workforce development policy (through allocation of the state-level Job Development Fund). Over decades’ long stewardship of state and federal workforce investments, the board has built a strong legacy of engagement and dynamic leadership.

The full GWB meets no less than 8 time a year (and as needed), while its committees are typically active monthly. The board’s work is coordinated across the following committees - Strategic Investments and Evaluation, Executive, Adult Education & Employment, and Career Pathways. Each committee plays a critical role under WIOA with the Executive Committee playing the principle lead and hub of coordination. Each Committee, in turn, may bring together sub-committees and/or task groups made up of local and state partners working together on specific strategies. A list of all board members can be found on the GWB web site. (www.gwb.ri.gov).

The GWB is supported by an executive director and a staff of six people that are involved in day-to-day implementation of key initiatives. On an ongoing basis, staff members help to operationalize the required functions of the state board. Information and items requiring board input or approval are brought to the GWB at regular meetings for action and to the Executive Committee as appropriate. Information is communicated to the public through the GWB’s web site (www.gwb.ri.gov).
2. Implementation of State Strategy

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

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

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

Rhode Island’s cross-agency operational strategy will focus on cooperative service delivery and integrated planning and policymaking. Recognizing that no one agency or program is equipped to meet all of a client’s potential economic or human service needs, Rhode Island’s strategy calls for collaborative problem-solving, combined planning, and shared implementation of strategy. This approach provides partners a more complete understanding of the needs of client and enhances our ability to provide services in tandem to maximize the effectiveness of those services. For this reason; Rhode Island has included, in addition to the core program partners, the following combined program partners in this state plan: Temporary Assistance for Needing Families, Trade Adjustment Assistance for Workers program; Jobs for Veterans State Grants program; Unemployment Insurance, Senior Community Service Employment Program, and, seizing on the opportunity presented by the 2018 reauthorization of the Carl D. Perkins Career and Technical Education Act, the state Career and Technical Education program. External workforce development partners will include non-WIOA public programs as well as other community-based job training and placement agencies. By coordinating the planning activities of these programs, Rhode Island seeks to create a common vision for meeting the career needs of all Rhode Islanders served under these programs, in a manner that meets the state’s current and projected industry demand.

Cooperative service delivery starts with reimagining the One Stop centers and allowing them to play a role that is natural for them within the state workforce development network. While industry intermediaries and business service staff will have the job of working with the demand end of the market, One Stops gain the latitude to commit themselves fully to the comprehensive needs of the job seeker. By spending the appropriate amount of time with job seekers, rather than attempting to be the entire network for the individual, the One Stop can help connect job seekers to the services or sequence of services that best meet the job seeker’s specific needs. Some of the important aspects of re-aligning the One Stops include focusing on training career coaches, case managers and guidance counselors on how to navigate the workforce development network, aligning coaching with industry needs and standards and providing clearer and more refined guidance for job seekers. Reimagining the One-Stops also necessitates a comprehensive review of the customer flow and client experience within the centers themselves. During the plan development process, one stakeholder commented that
visiting a One Stop Career Center ‘felt like going to the DMV’ (Department of Motor Vehicles). A comprehensive review of the One Stop centers will help reform the client experience to one that is customer/human-centered and is dictated less by the needs of our respective programs and more by the needs of our collective customers.

To the extent possible, cooperative service delivery also requires a common language and a common standard of quality for WIOA partner programs. For this reason, in the coming year, state partners intend to collaborate on a systemwide Community of Practice which will work with providers, clients, employers, and advocates to jointly establish uniform statewide definitions and standards of quality for matters that may include, but not be limited to:

- A uniform standard (or standards) of ‘work readiness’
- A uniform definition of ‘soft/essential/job readiness skills’
- A uniform definition of ‘work experience’ to align to the state definition of work-based learning
- Uniform and high-quality career counseling standards
- Uniform and high-quality financial coaching / financial literacy standards

While the ability to require or mandate adoption of these standards and definitions varies based on program, funding source, and contracting mechanism; the effort will nonetheless serve as a guidepost for the larger workforce development network and a foundation for high quality customer-centered service.

Cooperative service delivery also requires that each segment of the workforce network be fluent and familiar with the services and capabilities of the other. Therefore, Rhode Island will develop collaborative training toolkits and implement cross-agency training to ensure that all of the resources of the system can be funneled appropriately to customers. The expertise of specific partners will be utilized, such as having adult education and family literacy programs provide training on assessment delivery to workforce center staff and using ORS’s expertise to provide disability awareness and etiquette to core and combined partner staff.

Cooperative service delivery further requires that each partner program is aware of the services and supports a client is receiving elsewhere and is knowledgeable of the impact (or lack of impact) that income and employment may have on those supports. During the development of the 2020 plan, WIOA planning partners received feedback from both client advocates and the provider community which emphasized a general lack of knowledge regarding human service eligibility conditions and the so-called ‘benefits cliff’. In response to this feedback, the State Workforce Development Board intends to work with relevant state agency partners to: (1) provide definitive and uniform guidance regarding the impact of service-related income (i.e. participant stipends, incentives) and employment earnings on all public assistance programs, and (2) increase the level of real-time interagency communication regarding the impact of employment and earnings on individual’s client eligibility and benefit levels.
Embracing the opportunity of integrated planning and policymaking first requires clarifying partner roles, braiding resources across programs to maximize investments, establishing common standards around client intake and service referrals, and developing an IT infrastructure to support intelligence sharing and effective case management among partner entities, both government and non-government. Clarifying partner roles and implementing an integrated resource team model is critical in developing a cooperative service delivery model. The integrated resource team model started as a pilot model under the Rhode Island Disability Employment Initiative grant. In the pilot participating agencies committed to participating in ad-hoc teams developed around meeting the needs of individual clients. If one agency determined a client needed to be referred to additional services, the agency receiving the referral would commit to participating in a joint case management team with staff from other programs serving the same client. As a result, coordination and collaboration among employment and training programs fundamentally improved through a blending and braiding of resources at a customer level. By giving a goal specific explanation of available resources, the Resource Plan helps the customer, One-Stop staff, and community partners coordinate and maximize available resources. Bringing the integrated resource team model to scale requires structural changes to create response teams. State agencies responsible for administering a program must assign points of contacts between frontline staff members to provide as close to immediate feedback as possible on the eligibility of a client for additional services. Frontline staff should be directed to view their caseload as a shared caseload with partnering agencies and that referrals requiring attention do not constitute a ‘competing’ caseload. A client in need of TANF or a similar service is not any more or less in need based on how the need was identified.

In addition to creating the infrastructure necessary for frontline staff to share caseloads, taking the integrated resource team model to scale also requires a government and non-government continuous improvement team structure to develop solutions around practical challenges hindering collaborative efforts throughout the workforce network. Continuous improvement teams are ad-hoc teams comprised of subject matter experts from both government agencies and non-government organizations convened to solve practical challenges facing the workforce network. Teams will be ad-hoc in nature and therefore will not be standing committees, and are topic centered not membership centered. When a team resolves a challenge the team will be dissolved even if the team members may serve on a new team. While a subtle difference, having topic-based teams rather than member-based teams ensures only the relative members are participating in a team for a given topic and that the topic at hand is addressed before a new topic is introduced. The continuous improvement teams will be responsible for determining the cause of the challenge and will amend any internal policies or processes contributing to the cause of the challenge. If the team identifies more formal policies, such as regulations or statute, as being the cause of the challenge, the team shall make recommendations for amending the official policy to the appropriate agency executive or workforce board for consideration.

One barrier to cooperative service delivery that has long been a challenge to the workforce network is the disparate and siloed MIS and data collection/storage systems utilized by the various WIOA partner programs. There continues to be a need for basic client data collection
standards that all service providers could collect as part of a unified intake process. This team would be tasked with determining which data elements about a client should be shared among one-stop partners to increase the quality and efficiency of services provided. While this an attractive option to improve the client experience, concerns over the sharing of confidential data between entities remain. Recently, a number of Rhode Island state agencies have entered the exploratory stages of procuring a comprehensive statewide electronic client referral system, intended to include all human service categories, as well as education, employment, and training programs. While the effort is still in its early stages the scope, depth, and breadth of the effort provides one of the strongest opportunities to date to create a more integrated and unified client and service referral system. WIOA plan partners will participate in this development effort and hope that such a system, if operationalized, could dramatically improve the client experience and simplify the transmission and sharing of client data.

Cooperative service delivery also requires innovation in how services are delivered. A frequent concern raised regarding the public workforce network is that of client accessibility. These concerns range from ensuring the hours of operation of career centers met the needs of clients to offering services in more geographic areas using technology, other partner organizations, and a mobile unit.

Executive management coordination is the final aspect of the cooperative service delivery model. Executive managers in all program agencies are responsible for ensuring the new model is implemented throughout all levels of the program, committing mid-level administrators to participating in the continuous improvement teams, and ensuring changes resulting from continuous improvement teams are implemented. Executive management is also responsible for handling any formal policy recommendations resulting from the continuous improvement teams.

Because most workforce related programs have similar goals for their clients, program design and requirements are also similar. As a result, programs have created numerous microcosms that perform similar functions yet remain unrelated from each other and often serving clients based on a specific set of client characteristics, such as having a disability or being a veteran. Examples of overlapping functions include, but are not limited to, employer outreach, subsidized employment programs, client counseling, and client assessment. Such duplication limits the resources of all programs, and creates confusion among both individual clients and businesses about what services exist, how to access services, and what combination of services will best suit an existing need.
Once programs are able to collaborate around shared functions, then program resources can be more effectively braided to support common goals. Because most program funding is participant based, programs have often struggled to leverage funding in a meaningful way since pooling funds has not been an option. Recognizing these past failings, Rhode Island seeks to develop real-time braiding practices that capitalize on pursuing the shared goals of separate programs and developing customized funding plans for each participant in a jointly supported activity. As Rhode Island implements the strategies described in this plan, the ability to braid funding in real-time to address the unique needs of clients and employers becomes a critical function of all partner programs.

While all of these initiatives will enhance the services that existing customers and those who are funneled to programs receive, the full vision of WIOA cannot be realized unless the system overall is understood as an asset and utilized as a resource by a much broader base of businesses and jobseekers. All of the agencies responsible for programming under this combined plan are committed to creating a uniform and consistent approach to outreach and branding that will offer a clear and consistent message to job seekers and employers alike that Rhode Island is hiring, and that the workforce development network is here to help. The employer and community representatives on the state and local boards provide an effective vehicle to launch these efforts and will help support the implementation of awareness strategies throughout the state.

The state plans to emphasize and focus on the following four priorities when it comes to youth workforce investments in general, and the Youth WIOA program in particular:

First, the state will focus on alignment of the Youth WIOA program with the state’s overall youth vision. The Youth WIOA program will be more intentionally connected to the PrepareRI Initiative and programs and other state youth investments (i.e. the Real Skills for Youth program) under a unified theory of action which will provide a seamless experience for youth participants. The state will prioritize high-quality work-based learning and create a uniform definition of WIOA ‘work experience’ to match the Governor’s Workforce Board’s work-based learning guidance and emphasize work readiness and growth in essential skills as a key component of successful youth programming, including Youth WIOA.

Second, the state will also use the Youth WIOA program’s guidance around serving out-of-school youth to focus on better serving the opportunity youth population. Under Youth WIOA, the state will work with youth providers to target outreach to older youth who are disconnected from education and the workforce and create and update programming to meet the needs and address unique barriers of this population.

Third, for all youth, and for older youth in particular, the state will work to create seamless pathways to jobs and apprenticeships, and on-ramps to in-demand industries for youth participants via apprenticeships and other forms of job training.
Lastly, the state recognizes the importance of support services in all WIOA programming, and particularly for youth participants. The state will work with youth providers to ensure that programming includes comprehensive supports and mentorship.

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, ensuring coordination of, and avoiding duplication among these activities.

As part of its state-level statutorily mandated responsibilities, the Governor’s Workforce Board is charged with analyzing and setting a collective vision and strategy for all public workforce development programs, both state and local, and without regard to their status in relation to the combined plan. As the activities detailed within this plan are implemented, all partners will be invited to the table and efforts will be coordinated with existing initiatives and meeting schedules to ensure that a fair opportunity has been created for the involvement of public and non-public partners. As a concrete example of alignment and collaboration across programs; the recently launched Employer Workforce Navigator (www.workforceRI.com), while established and maintained by the Governor’s Workforces Board, was left open for any public workforce program, regardless of WIOA status, to list information about their program and better connect with employers. This website was designed to bring all of the various workforce development programs available in Rhode Island to the employer in one digital location. It does not matter if the program is viewed as a ‘competitor’ to WIOA programming or not; if they exist to help meet employer workforce needs and connect Rhode Islander’s with jobs; they were welcomed to the table.

The vehicles for statewide network alignment are readily identifiable. For this plan to succeed the vehicles must be leveraged in a deliberate and effective way. The sector- and community-based partnerships (Real Jobs RI and Real Pathways RI, respectively) support alliances between and among businesses and public, private, and nonprofit entities that focusing focus on meeting the needs of specific industries (Real Jobs RI), or serving populations with traditional barriers to employment and regions of the state with above average concentrations of poverty or unemployment (Real Pathways RI). Lead by a lead convener, these partners collaborate to provide workforce development services that are demand-driven, linked to the larger workforce development network, and designed to maximize the opportunities for middle class employment.
The organizing principle behind these partnership initiatives is that employers know best what their industry needs, and that agencies that work on a daily basis with clients with barriers to employment know best the unique, often overlooked, challenges their populations face. These programs place this expertise as a center of gravity around which often siloed and divergent state programming can begin to organize. With the industry sector and career pathways strategies outlined in the plan as a guidepost; these partnerships engage with elements of the workforce development network, as needed, and help to shift, evolve, and align practices to better meet employer demand and client need.

These programs also serve as the nexus where state funded programs and federally funded programs unite to the benefit of job seeker clients. That unifying effort will be made more deliberate and strategic in the coming four years as Rhode Island continues to dissolve the barriers between state and federal programming. Some of this work is already underway. For example, while Title II AEFLA funding administered through the Department of Education has historically funded traditional classroom/cohort-based education models; a large share of those most in need of adult education services are already working and are challenged to find time to meet a strict class schedule. In response to this challenge, Rhode Island is utilizing state funds to enhance the reach of the adult education network and provide contextualized adult education and basic skills instruction in cooperation with in-state employers and at the employer’s place of business. Such a program illustrates how smart deployment of state funds alongside federal programming can enhance and augment the reach and impact of both.

Another example of strategic blending of state programming and investments with federal investments is the state-level Work Immersion program. The Work Immersion Program offers wage reimbursements to eligible Rhode Island businesses that provide a paid work experience to eligible Rhode Island job seekers. While the State Workforce Development Board administers the program, all WIOA and non-WIOA partner agencies and organizations that assist Rhode Islanders with barriers to employment are welcomed and encouraged to utilize the program as part of their portfolio of employer services. The program offers up to half an individual’s wages back for a trial employment period which can be a strong incentive for employers to expand and diversify their hiring channels. A concerted effort to educate and connect employment agencies throughout the state with the work immersion program will be made in the coming four year period.

State funds can also help stand up new components and assets within the workforce network that can then be utilized on an ongoing basis by federal programs. For example; while Apprenticeship is a proven and effective model to build ladders into the middle class for low-income (and potentially low skilled) adults; it is not always clear how WIOA and non-WIOA partner programs can effectively connect with this training model. Pre-apprenticeship programs can serve as a strong and effective linkage between state programs and apprenticeships; but few WIOA programs have the resources to ‘seed’ and fund the development of pre-apprenticeship programs, leaving a critical gap in the system.
State investments help address this challenge in several ways. First, the state funded Non-Trade Apprenticeship Development program provides development funds to organizations throughout the state to create new and innovative apprenticeship models outside of the traditional trades. These new models are built by employers and industries themselves and provide an incredibly effective training and employment tool that employers can rely on. Once developed, these Apprenticeship programs can pursue placement on the ETPL, and/or partner with the state on additional opportunities as described below.

Second, the hybrid-funded industry and community-based partnerships are able to request resources to develop and deliver traditional training programs, as well as formal pre-apprenticeship programs that are informed by and linked to registered apprenticeship programs (both trade and non-trade). State funds are able to pay for development and scaffolding of such programs which then become a fixture of the workforce network. WIOA programs, WIOA partners, SNAP Employment and Training, and others now have a new training option with whom they can partner and provide an avenue to high quality Registered Apprenticeship programs for their clients.

Finally, the state-funded Non-Trade Apprenticeship Incentive program offers an incentive of $1,000 per non-trade apprentice hired provided the apprentice is registered with the State Apprenticeship Office and has completed their required probationary period. This is yet another state-funded resource and enticement that, when integrated effectively, can help increase opportunities for clients of WIOA and WIOA partner programs.

These models provide a template for effectively braiding, integrating, and otherwise combining state workforce development investments with the programming of WIOA partner programs to the betterment of all. The next step is to take a more rigorous analysis of what activities, resources, and services our WIOA partners can and cannot provide; then determining how state programming and resources can most effectively close that gap.

In the youth space, the goal is to align the Youth WIOA program with the state’s overall youth vision. The Youth WIOA program will be more intentionally connected to the PrepareRI Initiative and programs and other state youth investments under a unified theory of action which will provide a seamless experience for youth participants. For example, the state will prioritize high-quality work-based learning and create a uniform definition of WIOA ‘work experience’ to match the Governor’s Workforce Board’s work-based learning guidance and emphasize work readiness and growth in essential skills as a key component of successful youth programming, including Youth WIOA. Similarly, the state’s Perkins V plan emphasizes expansion of work-based learning and associated definitions and measurement plans will be aligned as well.

Youth WIOA providers, or “Youth Centers” serve as an entry point and spring board that primes youth for success and then pipelines and connects to state-funded partner programs for placements into work experiences and work-based learning opportunities. Such partners could include but not be limited to:
• Real Jobs RI – Industry-sector partnerships lead by an intermediary that, collectively, have access to hundreds of potential work experience and employment opportunities within Rhode Island’s high wage and/or high demand industries.

• Real Pathways RI – Service provider partnerships lead by an intermediary that specialize in meeting the needs of populations with barriers to employment and are provided resources and guidance to develop demand-driven programming with employers.

• Real Skills for Youth – partnerships that engage youth in career exploration programming, work readiness training, and high-quality work-based learning

• PrepareRI Internship Program – a rigorous, paid summer internship program for high school juniors with the State’s top employers, managed by a statewide career readiness intermediary

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 cooperative service delivery model is a critical component to realizing the Governor’s vision of a Rhode Island where individuals from all income and skill levels, no matter their present circumstance, can rise up the career ladder and improve the economic circumstances for themselves and their families.

While the structure of our respective programs may differ, sometimes dramatically, all Combined Plan partner programs share the collective mission of providing the people of Rhode Island with career, job training and educational opportunities. The cooperative service model seeks to improve customer flow through One Stop centers and to enhance the value received by customers from their experience with the centers. Through joint policy developing and planning; plan partners will continue its work in this area to facilitate customer flow enhancements and improve customer value through clear and direct policy guidance and performance expectations that address the following areas:

• Removing barriers to, and facilitating the adoption of, joint case management;
• Re-orientating One Stop focus and prioritization around the job seeker client and developing staff; and
• Organizing and integrating new partners and provides for more service diversity and an enhanced ability to respond to client need.
Policy reforms and performance visions will be augmented by technical support to both local areas in helping operationalize this vision. As mentioned previously, such technical assistance and staff training would be conducted in a collaborative and cross-agency fashion that utilizes the expertise of specific partners.

In addition to the promotion of cooperative service delivery, the State of Rhode Island will also heavily promote cooperative outreach and awareness efforts, with a specific focus on reaching underserved populations. During the development of the 2020 plan, WIOA planning partners received stakeholder feedback which emphasized a general lack of awareness within the community regarding One Stop services and, in some instances, a lack of comfort in accessing them. In response to this feedback, each Local Area will be charged with demonstrating success in community engagement and outreach including, but not limited to, partnering with community-based organizations, identifying community leaders/champions, and working with their area school districts to increase the awareness and availability of services beyond the One Stop location and within the community. Emphasis will be placed on partnering with culturally competent organizations with trust and positive reputation within the state’s increasingly diverse communities.

Rhode Island’s decades long investment in our Youth Centers (Youth WIOA providers) has resulted in a network of talented and responsive service providers that excel in meeting youth ‘where they are’ and providing the requisite referrals and wrap-around services that gird each youth for success in whatever career service or training that is appropriate for them. These services are provided in a contextualized way and in a manner that aligns with their career goals and prospects.

Due to the strategic co-deployment of WIOA Title I funding alongside state funds, services are available for all youth ages 14-24 years of age throughout the state regardless of income or socio-economic factors. Eligibility is determined on the ‘back end’ with WIOA dollars are prioritized to serve Out of School Youth. This wider service net helps build referral networks and ‘word of mouth’ among a much larger pool of youth and provides access and avenues to reach otherwise difficult to engage out of school youth.
D. Coordination, Alignment and Provision of Services to Employers

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

Employer services is one of the most important areas where role clarity and alignment are vital to program success and provides an illustrative example of how role clarity can improve program performance. With so many client-focused programs, driven by siloed performance targets, there is very little inherent opportunity for a coordinated employer engagement strategy. As a result; employers may develop a strong relationship with one program and not gain access to other resources that may be of additional use to them. Even more likely, the employer may experience the opposite challenge of ‘government fatigue,’ which occurs when an employer is approached by too many programs looking to assist them. In a state the size of Rhode Island government fatigue can happen quickly if a coordinated employer engagement strategy is not in place.

All programs struggle to develop enough consistent employer connections to generate employment opportunities for their clients. Driven by the need to meet their own programmatic and performance goals, and, more importantly, a desire to best serve their client, programs may view employed engagement as a ‘competition’ with partner program. The idea that employer services is a ‘zero sum game’ where one program’s success must come at another’s programs failure has lead to a duplicative and disjointed approach that fails to benefit job seeker and employer alike.

By designating a lead agency to manage employer engagement for workforce purposes and ensuring that agency is aligned with the economic development strategy of the state, programs can better merge and leverage scarce resources to support this consolidated approach, while potentially freeing up time and funding to concentrate on other key client-center priorities. This does not mean that individual programs will no longer interact with employers; on the contrary, program relationships with employers will strengthened and deepened as a high quality and uniform approach results in more meaningful and plentiful employer relationships for all partners.
Per state statute, the Rhode Island Executive Office of Commerce is responsible for setting and communicating the economic development strategy for the state. This office is required by Rhode Island state law to coordinate with the Governor’s Workforce Board broadly, and Department of Labor and Training more specifically, to align the state workforce development efforts with the state’s economic development vision. Over the last five years, this relationship has been formalized in a number of ways; the Secretary of Commerce serves as the Vice-Chair of the State Workforce Development Board; key Employer Services staff with the Department of Labor and Training is physically housed at the Department of Commerce and is involved in critical business recruitment and retention activities. With this relationship in place and with the state department of labor leading the statewide effort to create and scale up sector-based partnerships in industries identified by the Department of Commerce as economically critical, the department of labor is well positioned to align and coordinate employer engagement across partner programs in a manner that aligns the growth areas as identified in the Rhode Island Innovates report.
E. Partner Engagement with Educational Institutions

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

Rhode Island Governor Gina Raimondo has set an ambitious goal to ensure that 70% of working-aged Rhode Islanders hold some form of post-secondary credential by the year 2025. As illustrated in the labor market and economic findings in this plan, nearly seven out of ten jobs created in Rhode Island over the next decade will require more than a high school diploma. Reaching this ambitious goal will require an ‘all hands on deck’ effort and the administration has strongly encouraged policy and programmatic alignment, and data-sharing between and among combined planned partners, the office of postsecondary education, and all public, private, and nonprofit institutions of higher education, particularly those focused on career and technical education.

This top level alignment extends throughout the workforce development network and combined plan partners are constantly working towards better integrating networks as the Community College of Rhode Island and the state’s public universities and colleges into the work of WIOA. Once again, the sector- and community-based partnerships (Real Jobs RI and Real Pathways RI, respectively) provide an effective vehicle for this engagement and alignment. Based on industry signaling and need; partnerships engage with training and education partners (often, but not exclusively, community colleges and career and technical education schools) to steer the state’s training infrastructure into better alignment with the needs of employers. Whether it’s the addition of cutting-edge equipment, or industry-informed revisions to curriculum; the Real Jobs RI program provides the resources needed to meet immediate demand, while leaving behind long-term changes to the workforce development landscape that improve the overall performance of the network. In the example of industry-driven curriculum revisions; these changes are not exclusive to activities funded by the Real Jobs RI initiative; but remain with the training program even after funded activities complete. Should that training program also be listed on the state Eligible Training Provider List (as most public programs are) or were the entity contracted to provide training and work supports to TANF clients; individuals served by these programs will also benefit from improved industry-informed training. These sort of revisions and tweaks happen continuously, and throughout the network. The byproduct is an improved and ever-evolving training infrastructure that brings the WIOA network, the states institutions of higher education, and employer need, into better alignment.
Evidence of greater engagement with Rhode Island’s career and technical schools can be found in the inclusion of the state’s Perkins Career and Technical Education program as a partner in this combined planning effort. There are areas of overlap in both Perkins and WIOA that would best be served by a collaborative effort that reflects shared priorities. For example, while both WIOA and Perkins have the attainment of Credentials as a performance outcome – both do not presently have a statewide definition, and both are part of the Governor’s larger post-secondary attainment effort. Jointly establishing a uniform definition of credential, as but one example of many areas where Perkins and WIOA can collaboratively plan, will make future cooperation and alignment between the programs easier.

Areas of alignment between WIOA and non-CTE secondary education are best exemplified in the statewide PrepareRI effort. Reflecting the WIOA priorities of academic advancement, skills enhancement, and career preparation PrepareRI is Rhode Island’s 3-year action plan to ensure all Rhode Island students are college and career ready by graduation. PrepareRI aims to close the gap between what students learn in school and what they need for high-demand jobs, and to ensure that historically underserved student populations have expanded access to quality career preparation opportunities in priority sector industries – through scaling out activities such as career exploration and work-based learning opportunities. An important component of the PrepareRI effort is its internship program which places Rhode Island high school juniors in paid summer internships with the state’s top employers in a range of industries. This effort is a sizable compliment to the work of the WIOA Title I Youth program and a priority over the next four years will be to identify areas for the programs to better align.
F. Partner Engagement with Other Education and Training Providers.

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

As described in the preceding section E, Rhode Island’s sector partnerships are a crucial vehicle for engaging public and non-public education and training providers, meet the state strategies for better meeting employed demand by connecting with employers and often leaving behind industry-informed system changes to the benefit of the education and training system overall. As the entity responsible to helping bring alignment and shared vision to the workforce network; the State Workforce Development Board has been more deliberate in reaching out to additional partners to help connect them to the work of our sector partners, as well as inform them of the identified needs and priorities of the state workforce network. As an example where the State Workforce Board may engage providers on the eligible training list (ETPL) to help advance state workforce development strategies; certain board members, and community advocates, have expressed an interest in seeing greater availability of training programs on the ETPL that do not require English proficiency as a pre-requisite. While an overarching goal of the workforce network is to promote English language proficiency, there may be instances where vocational training and employment is the best first step for a client, with English language instruction happening soon after. If the workforce system elects to explore this matter further, the state workforce development board expects to outreach to all ETPL providers to discuss what opportunities or barriers exist to increasing the availability of such programming.
G. Leveraging Resources to Increase Educational Access

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

Across program boundaries and funding streams, Rhode Island has a myriad of initiatives designed to increase educational access and attainment in the state. Reflective of the ‘all hands on deck’ effort referenced earlier with regards to the Governor’s post-secondary educational attainment goals; WIOA plan partners are intimately familiar with each of these initiatives. An important focus during the next four-year operational cycle will be on integrating these efforts into the larger workforce development network.

Beginning in high school, the state of Rhode Island launched a new initiative called the Advanced Coursework Network – public school students in schools and districts that join the network will be able to take advanced-level, credit-bearing courses offered by a wide range of approved providers at no cost to themselves or their families, subject to available state and district funds. The state also launched CS4RI (Computer Science for Rhode Island) - an initiative to bring high quality computer science (CS) learning experiences to all students. CS4RI is a partnership between Rhode Island state government, the Rhode Island Department of Education, K-12 schools, higher education, private industry, and non-profits across the Rhode Island.

Rhode Island’s P-TECH (Pathways in Technology Early College High School) allows students to take college-level courses while in high school, benefit from internships and mentoring, and graduate with a high school diploma and an industry-approved associate degree. Business partners help design the program and ensure that changing industry needs are addressed in the curriculum. The P-TECH initiative creates the opportunity for Rhode Island’s students and a steady stream of talented, trained workers for its businesses.

Beginning with its PY2018 funding round, the Rhode Island Adult Education and Family Literacy program has encouraged, and is funding, new models for adult education, such as the “RI-BEST” integrated approach to enable students to earn their GED, post-secondary credit, and receive job training at the same time. RI-BEST (Rhode Island’s Integrated Basic Education and Skills Training) is modeled after Washington State’s nationally recognized I-BEST program. Students who take RI-BEST classes earn college credit and receive additional academic support and tutoring, as they receive technical and occupational skills training.
Perhaps the largest single state level investment in increasing educational access was the 2017 launch of the Rhode Island Promise Scholarship. The Rhode Island Promise is a “last-dollar scholarship” that fills in the gap between other aid, like Pell grants, and the actual costs of tuition and mandatory fees at the state’s community college. There are no extra forms to fill out for this scholarship, only the FAFSA form that is required for federal student aid programs like Pell. RI Promise funds are distributed directly to the Community College of Rhode Island and are applied to the student’s bill for tuition and mandatory fees. RI Promise “fills the gap” between a student’s financial aid package and the actual costs of college and will help set more Rhode Islanders on the path to postsecondary education.

The Department of Human Services promotes educational access by leveraging TANF funds through funding of tuition, fees and supportive services for TANF (‘RI Works’) eligible clients to engage in basic education, postsecondary education, and job training, enabling them to obtain credentials such as a high school diploma, GED or high school equivalency, and earn college level vocational education credits and credentials.

Rhode Island is strongly committed to increasing access to education to all Rhode Islanders and using every available resource to do so. The proper ‘systems mapping’ and strategic alignment of WIOA, TAA, TANF, Vocational Rehabilitation, Pell Grants, RI Promise funds, and other resources to assist participants in their educational goals is a complex undertaking but one that is necessary if the state is to realize its ambitious educational attainment goals. At the same time, the core partners will focus on increasing nontraditional and alternative pathways to education to provide a greater flexibility that better reflects the diverse ways that people learn and achieve.
H. Improving Access to Postsecondary Credentials

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

In 2018, Governor Raimondo released a systemwide policy roadmap for achieving the ambitious goal she set to have 70% postsecondary attainment in Rhode Island by the year 2025. The plan lays out four key recommendations: 1. Create pathways to postsecondary education attainment for adults; 2. Strengthen investments in postsecondary retention and completion; 3. Expand postsecondary access and preparation in the K-12 pipeline; and 4. Establish collective ownership of the postsecondary attainment goal. The work of WIOA plan partners is focused on meeting this statewide goal in a manner that supports the performance measure in WIOA for postsecondary credential attainment.

The initiatives across WIOA, TANF, AEFLA and other plan partners outlined in the preceding section G help illustrate the larger efforts underway to increase access to postsecondary credentials. On a more individualized basis, Rhode Island’s sector and community-based partnership strategies include the refinement, and in some instances creation, of industry recognized credentials that reflect the skills employers need. Clients that receive training through the Real Jobs RI or Real Pathways RI programs often earn an industry recognized credential at the conclusion of training, helping increase the total number of working age Rhode Islanders with a credential, in furtherance of the Governor’s goal. Once programming concludes, the industry-informed revisions to curriculum and credential design remain, benefiting future students, regardless of program or funding stream.

A critical component to Rhode Island’s credentialing effort will be the continued expansion of apprenticeship. Apprenticeship is a proven workforce training strategy to develop new talent in highly-skilled occupations and combines paid on-the-job learning with related technical instruction in the classroom. Registered Apprenticeships are high quality work-based learning and post-secondary education models that meet national standards for registration and often result in an industry and/or post-secondary credential. Rhode Island has also taken a number of strategic steps in recent years to promote the expansion of apprenticeship, including offering state-level employer incentives for apprenticeship and making financial resources and technical assistance available to increase the number of apprenticeship programs available. Rhode Island’s efforts to date reflect some of the best and leading practices nationally to encourage and expand apprenticeships into nontraditional occupations and industries and the state intends to grow and enhance these efforts during the coming four year operational cycle.
I. Coordinating with Economic Development Strategies.

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

Per state statute, the Rhode Island Executive Office of Commerce is responsible for setting and communicating the economic development strategy for the state. Also per state statute; the Secretary of Commerce serves as the Vice-Chair of the State Workforce Development Board. This ensures that policies and decisions regarding the State’s workforce development system are taking into account the strategies and expertise of Office of Commerce. When it comes to engaging employers and industries, WIOA plan partners take their strategic lead from the Office of Commerce regarding which industries and occupations best reflect the state’s economic priorities and strategies. In addition, the afore-mentioned sector partnerships which help drive so much of the systemwide innovation and evaluation, where selected and awarded based, in larger part, on the extent to which they aligned with the state’s economic development priorities. Lastly, the practical alignment and progression of foundational education services, occupational training, career services, and credentialing among WIOA plan partners – wherever possible and taking into account consumer choice and the needs and interests of our job seeker clients – will give deliberate consideration to the extent to which they reflect the growth areas as identified in the Rhode Island Innovates report, including:

- Biomedical Innovation
- IT / Software, Cyber-Physical Systems, and Data Analytics
- Defense Shipbuilding and Maritime
- Advanced Business Services
- Design, Food, and Custom Manufacturing
- Transportation, Distribution, and Logistics
- Arts, Education, Hospitality, and Tourism
- The Blue Economy
- Offshore Wind
- ‘Back Office’ Operations
b. State Operating Systems and Policies

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

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

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

Rhode Island’s workforce development network is supported by a strong and multifaceted operational architecture. Increasing integration across these systems remains a key focus of the state and is critical if the vision of cooperative service delivery is to be realized.

EmployRI (WIOA)

EmployRI is Rhode Island’s statewide virtual One-Stop and case management system which also functions as the state’s Job Bank and Labor Market Information system. The operating system was procured from Geographic Solutions, Inc., and implemented in May of 2009; it is a free online workforce development tool designed for jobseekers, students, training providers, workforce professionals, and analysts. The system has greatly improved the workforce networks’ ability to assist with job matching for self-service jobseekers and employers. It has also been proven to be a helpful tool for staff-assisted matching and individualized skills gap analysis to assist jobseekers who may require additional schooling to upgrade their skills to meet current workforce demands.

In addition to jobs posted in EmployRI by Employers, the system spiders job postings from multiple job boards (state and private), government sites, corporate websites, social media sites, and the National Labor Exchange to create a job bank within the Virtual One-Stop. The system allows jobseekers to target their search by preferred employer, job location, source, date and/or required skills. The system also offers additional features for jobseekers and students such as résumé creation wizards (Resume Builder) and scheduled, automated job search tools (Virtual Recruiter), as well as lists of eligible training providers and programs.

Jobseekers can also enter the job and personal skills they possess as well as information on desired careers to further customize their job search within the system. Employers utilize the system to create and post job orders, write job descriptions, and conduct talent searches.

EmployRI is also an important labor market information tool, containing a vast database of industry and occupational information including wages, projected employment, and career and industry growth rates. The labor market information module contains state and national data and allows jobseekers to research potential careers and the required training and/or experience needed to excel in them.
EmployRI is used as the case management system for multiple workforce development programs, among them Wagner-Peyser (Labor Exchange), Workforce Innovation and Opportunity Act Adult, Dislocated Worker, and Youth (WIOA), Trade Adjustment Assistance (TAA), Reemployment Services and Eligibility Assessment (RESEA), National Dislocated Worker Grants and RI Works. With the exception of RI Works, the federally required reports are run using this platform. Additionally, the state has purchased an enhancement to EmployRI that allows the workforce network to utilize the system for case management of additional grants and programs.

In 2015 the state purchased and launched both a Spanish module and a mobile app for EmployRI. The Spanish module is designed to allow users with Limited English Proficiency (LEP) to view the EmployRI in Spanish affording many the opportunity to fully utilize all features the site offers in their primary language. The mobile app is available for both Apple and Android devices, is free for customers to download from either the Apple Store or Google Play, and allows mobile job-searching both manually and using GPS technology on mobile devices. Users can login to their EmployRI account from a mobile device and conduct and save general and customized job searches. Job searches conducted through the mobile app while jobseekers are logged into their EmployRI account are recorded for reporting under Wagner-Peyser just as they are when jobseekers are logged in to the full website and conduct a job search.

EmployRI has an integrated internet-based management information system (MIS) which includes common intake, case management, and data tracking components to meet the data collection and reporting requirements of, and provide a single interface for, WIOA, Wagner-Peyser, TAA, Jobs for Veterans State Grants (JVSG), Rapid Response activities, Business Services, the Migrant and Seasonal Farmworkers program (MSFW), among other reportable One-Stop services. The system provides Local Workforce Development Boards with the tools needed to deliver WIOA services through an income growth model, integrating workforce information, transferable skill sets, and career paths into the case management system. With data from other One-Stop partners, EmployRI data provides seamless information sharing and data exchange in addition to increased customer service. This connectivity forms the basis for the development of enhanced interagency data exchange.

This integrated intake system and resulting tracking system provides DLT, other state agency funded One-Stop partners and local entities, and most importantly, the Local Workforce Development Boards with the data necessary to operate and coordinate programs effectively. Utilizing this data, Rhode Island is able to evaluate how our systems are functioning, provide timely technical assistance, and help the local boards make programmatic and funding decisions. DLT and local workforce board staff continue to be involved in the development of the MIS system. Rhode Island is fully prepared to provide USDOL with any data it requires. EmployRI is a comprehensive data collection and management operating system that is used to enter participant and employer data, case notes, activities, assessments, exits, and follow-up activities. It contains online, real-time case management reports, providing local staff with demographic, activities, soft exit data, youth goals, and case management information.
The system also provides predictive performance reports based on staff entered data as well as the quarterly and annual WIOA reports and Wagner-Peyser reports which also incorporate wage record data. The predictive reports allow local workforce boards to determine performance and implement corrective action in a timely manner without having to wait for wage record data.

**CALIS (Adult Education)**

The Management Information System for adult education and family literacy programming in Rhode Island is named the Comprehensive Adult Literacy Information System (CALIS) and was developed to provide greater accountability and improve performance in Adult Education systems at the state and local levels. Administrators at every level have immediate, accurate access to program data and reports, allowing them to effectively manage the programs under their jurisdiction. The system is designed to meet all requirements for the National Reporting System for Adult Education. It delivers all federal NRS reports and has been designed to deliver several state-specific customized reports. CALIS is a web-based, real-time reporting system with the capability to provide teachers, local administrators and state administrators with instant feedback on students, classes and groups of classes. CALIS can also be used to deliver administrative messages to all users or to select groups of users based on login.

Local adult education programs are required to begin each fiscal year by entering basic program information, class information and schedules, and staff information. After intake and orientation has occurred for students, local programs enter student demographic information and assessment results; daily attendance is entered into CALIS on a biweekly basis at a minimum. Local program administrators can run NRS reports as well as customized reports at any time. The state office runs NRS reports quarterly to track educational gain performance and outcome measures. The state office is also able to export quarterly data from CALIS to follow up the employment outcome measures, and the office matches this data with the RI Department of Labor and Training wage records. The successful matches are then imported back into the system and recorded as outcomes for those students. In addition, the state can export data to match with the National Student Clearinghouse for the postsecondary education follow-up outcome measure. Both statewide and local program NRS Tables can be run by the state office, and final statewide reports are submitted annually to the NRS web system of the US Department of Education.
RIDHS (Vocational Rehabilitation)

The state Office of Rehabilitative Services has an Electronic Case File/MIS that is cloud based, proprietary and uniquely designed to meet the data collection requirements of Vocational Rehabilitation (VR) Programs. The product, Libera System 7, provides data security, reporting compliance, project management, case management, integrated authorization & billing, customer service and customization options. This product currently serves at least 14 state VR agencies and is WIOA compliant. The software is specific to State operated VR programs, used nationally by several other State VR Agencies, facilitates the Agency’s ability to meet and report on its Federal mandates and captures 392 data elements required by RSA/WIOA - all necessary to maintain Title I and Title VI funding for and function of Vocational Rehabilitation Programs that assist individuals with disabilities to obtain and maintain employment in integrated competitive work settings.

The Vocational Rehabilitation Program has staff co-located at each of the one stop sites and pays an annual rental fee for space, clerical and technology support. The VR program meets all of the approximately 320 data elements required for the RSA -911. VR has an electronic case file system that integrates all the required data elements, client specific services, financial authorizations and expenditures. The program captures all services authorized and provided to clients, plan development and employment outcomes. A client is not considered successfully employed until the client has been on the job for at least 90 days.

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

RIDLT and the local workforce development boards current operate and administer all one stop programs. In the future, all WIOA core partners will be co-located within a one stop and will provide the required services while operating under MOUs that will be drafted to facilitate data collection and data sharing.

RIDLT collects data from the LWDBs on a quarterly basis and logs all information into RIDLT’s MIS system EmployRI. EmployRI has the capabilities of reporting all required outcome data to USDOL as required by WIOA and Wagner-Peyser. All participant information is collected and tracked using social security numbers and EmployRI specific individual identifiers. The path that participates travel during their time as one stop customers is also tracked on EmployRI longitudinally.

WIOA mandated outcome measures are collected from WIOA participants within the one stops. ETPL vendors who are mandated to report outcome data to The Department report on a quarterly basis and are required to provide outcome data in order to retain eligibility. All youth providers contracted by DLT to provide youth services provide outcome data for youth participants on a quarterly basis. All providers currently report all WIOA outcome indicators.
The Vocational Rehabilitation program has staff co-located at each One Stop location. The data collection and reporting procedures for the VR program meet all of the approximately 320 data elements required for the RSA-911. VR has an electronic case file system that integrates all the required data elements, client specific services, financial authorizations and expenditures. The program captures all services authorized and provided to clients, plan development and employment outcomes. A client is not considered successfully employed until the client has been on the job for at least 90 days.

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

The GWB reviews, updates, and creates policy guidance on an ongoing basis as needed to support the strong implementation of activities throughout the state. Policies have been created with regards to regional and local planning, one-stop certification, priority of service, and program eligibility, among other areas. Specific guidance is being developed for all one-stop partners to clarify the requirements for access in the system so that one-stop operators and all partners have a mutual understanding of what is required. We expect to institute a training system that provides sufficient cross-training to all system staff so that the system can function effectively and meet the needs of customers across physical locations and entry points.

Workforce Innovation Notices (WINs) are the formal process through which the GWB sets statewide policies, guidance, and information for WIOA. Upon passage, these notices are delivered to the local workforce development boards as well as system partners. During the review and approval process, each WIN Notice includes a ‘plain English’ cover page for Board Members to better understand the scope, intent, and impact, of the policy, as well as the actual notice.

The State Workforce Board encourages local workforce areas to co-enroll participants into other programs that are appropriate for the individual participant’s needs. Co-enrollment can offer the opportunity to access additional program services and funds to help address a participant’s specific barriers to employment and/or education. Participants must meet the eligibility requirements of each program and will become part of each program’s performance outcomes. In addition to state policies, any local co-enrollment policies must also be followed. Going forward, GWB will be working with the core and required One-Stop partners to update relevant policies and to develop a process for cross-agency policy development to address the new opportunities for integration as a result of WIOA.

Details of the most current and recent GWB policies are listed below and the full text of each policy is available at www.gwb.ri.gov
WIN 15-09: Rhode Island’s Eligible Training Provider List (ETPL) identifies training providers who qualify to receive WIOA funds to train adults, dislocated workers, and youth. WIN 15-09 provides updated policy and procedures regarding application and continued eligibility on the ETPL, in accordance with WIOA.

WIN 15-16: Grievance Policies and Procedures allow individuals who may have been unfairly treated by the WIOA system to file a grievance. WIN 15-16 outlines the process and procedures for such grievances.

WIN 15-17: WIN 15-17 revises Rhode Island’s definition of a “Dislocated Worker” to better fit the economic realities of the state. This new definition expands the scope of that definition to help more Rhode Islanders while decreasing the administrative burden of determining and documenting eligibility.

WIN 17-01: In addition to state and local plans, WIOA allows for regional workforce development plans when appropriate. WIN 17-01 determines that given Rhode Island’s size, funding limitations, and current level of state-local cooperation and collaboration that the state itself is a “region” for the purposes of this policy and that the State Plan shall also serve as a regional plan.

WIN 17-02: In order to be eligible for WIOA-funded activities, a youth must meet certain eligibility criteria which includes facing a ‘barrier’ to employment. The state is allowed to define one of these barriers when a youth requires ‘additional assistance’ to obtain employment. WIN 17-02 describes specific educational and employment barriers a youth may face which will meet the definition of ‘requiring additional assistance.’

WIN 18-02: Infrastructure costs are those costs that are considered necessary to operate a One Stop Career Center such as rent, utilities, maintenance, supplies, and equipment. These costs are to be shared and negotiated by local areas among the partner programs. If these parties are unable to reach a consensus; WIOA requires states to develop a ‘backup’ infrastructure funding mechanism to be used. WIN 18-02 describes the state infrastructure funding mechanism.

WIN 18-03: When deciding who will access certain career and training services, WIOA requires priority be given to veterans, public assistance recipients, low-income individuals, and individuals who are basic skills deficient. WIN 18-03 outlines how priority of service rules should be applied.

WIN 18-04: WIOA requires that in order to be eligible to receive infrastructure funding a One Stop Career Center must be certified by their local board. The State board must establish objective criteria and procedures for use by local boards in certifying One Stop operations. WIN 18-04 outlines those criteria, including service excellence, universal access, and continuous improvement.
• **WIN 18-05:** WIOA establishes key performance accountability indicators and reporting requirements to be used in assessing the effectiveness of state and local workforce development areas. The state board is responsible for issuing a performance accountability policy that is consistent with these federal requirements. WIN 18-05 describes the various performance indicators that will be used to assess the performance of the workforce development system.

• **WIN 18-06:** ‘Rapid Response’ is a WIOA program that responds to mass layoff events or plant closures and quickly provides immediate aid to the affected company and their workers. WIN 18-06 describes the process for how Rapid Response services are to be engaged and provided.

• **WIN 18-07:** WIOA authorizes the transfer of up to 100% of local funds between the Adult and the Dislocated Worker programs. It also states that the Governor is responsible for approving such transfers. The State Board must establish criteria or factors for approving local workforce development board (LWDB) transfers of funds. WIN 18-07 provides guidance regarding the transferring of local funds.

• **WIN 18-09:** WIOA requires that the Governor designate local workforce development areas after consultation with the State Board and others. A local government unit or a combination of government units, may request new designation and existing local workforce development areas may request ongoing designation. WIN 18-09 outline the process for new and ongoing designations for local areas.

• **WIN 15-09-02:** Rhode Island’s Eligible Training Provider List (ETPL) identifies training providers who qualify to receive WIOA funds to train adults, dislocated workers, and youth. WIN 15-09-02 provides additional updates to policy and procedures regarding application and continued eligibility on the ETPL, in accordance with WIOA.

### 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.

Organizational charts of the Rhode Island Department of Labor and Training and the Governor’s Workforce Board can be found in appendix C. Rhode Island’s workforce development programs are state administered and operated locally, allowing the needed customization to meet the unique needs of businesses and job seekers throughout the state. Therefore, each of the core programs and required one-stop partners function differently at both the state and local level. The Rhode Island Department of Labor and Training (DLT), Rhode Island Department of Education (RIDE), and Rhode Island Department of Human Services (DHS) each have administrative responsibility for one or more programs contained in this plan. Below is a list of each of the programs included in this Combined Plan and the state agency that has administrative responsibility for each program.
The organizational structure the state workforce development network begins with the Governor’s office. The Governor has dictated the responsibilities of each WIOA core partner agencies as dictated by state and federal law.

The Department of Labor and Training operates the state workforce development programs, and acts as the fiduciary agency for the Workforce Partnership of Greater Rhode Island. All Adult and Dislocated Worker programs are run out of the One Stop Career Centers, of which the state has four. Youth programming is contracted out to independent youth centers- of which the state has fourteen.

The Department of Education funds numerous adult basic education programs, including but not limited to the Rhode Island Family Literacy Initiative (RIFLI) and the Rhode Island Regional Adult Learning Initiative (RIRAL) which focuses on ESL learners and GED preparation. The Department of Education also administers the state’s Perkins Career and Technical Education program.

The Department of Human Services currently contracts with ResCare to provide work ready services to RI Works (TANF) recipients within the One Stop network. The Department of Human Services also has a number of offices around the state which determine eligibility for assistance programs and refers individuals to programs within the one stops, and other basic skill providers.

The Office of Rehabilitation Services (ORS) administers the Title I Federal/State funded Vocational Rehabilitation Program (VR), the Title VI Supported Employment Program, and the statewide Transition program for youth with disabilities.

<table>
<thead>
<tr>
<th>Agency</th>
<th>Core Program</th>
<th>Non-Core Program</th>
</tr>
</thead>
<tbody>
<tr>
<td>DLT</td>
<td>Adult (Title I); Dislocated Worker (Title I); Youth (Title I); Wagner-Peyser (Wagner-Peyser Act, as amended by Title III)</td>
<td>Trade Adjustment Assistance for Workers Program (Chapter 2, Title II Trade Act); Jobs for Veterans State Grants (Title 38, Chapter 41); Migrant and Seasonal Farmworker Program (Title I); Senior Community Service Employment Program (Title V Older Americans Act)</td>
</tr>
<tr>
<td>RIDE</td>
<td>Adult Education and Family Literacy (WIOA Title II)</td>
<td>Carl D. Perkins Career and Technical Education</td>
</tr>
<tr>
<td>DHS</td>
<td>Temporary Assistance for Needy Families (TANF) Program (42 U.S.C.); Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV)</td>
<td></td>
</tr>
</tbody>
</table>
The Governor’s Workforce Board (Rhode Island’s State Workforce Development Board) is the state’s primary policy-making body on workforce development matters. In that this role, the GWB oversees and coordinates both federal workforce development policy (through implementation of WIOA) and state workforce development policy (through allocation of the state-level Job Development Fund). The Job Development Fund is a restricted receipt fund allocated from the state’s Unemployment Insurance fund. The Board seeks to deploy both funds seamlessly in one integrated and comprehensive workforce development network.

Other agencies are included in the workforce network as well. The Department of Corrections, for example, works with Department of Labor and Training to provide employment services to ex-offenders and newly released inmates.

Some workforce development activities are located outside the traditional workforce development network. Registered apprenticeships are included on the state’s ETPL list, but the Apprenticeship office is housed within the RIDLT Division of Workforce Regulation and Safety. Apprenticeships are registered by that division, but the Division of Workforce Development Services works with the apprenticeship office to expand outreach and referral activities within the One Stops.
B. State Board

Provide a description of the State Board, including —

The Governor’s Workforce Board serves as the State Board for Rhode Island and is established in state statute. A list of board members with affiliations can be viewed on the GWB’s web site, www.gwb.ri.gov. All new board members are provided with an orientation on the background, purposes, and responsibilities of the Board. Staff is responsible for day-to-day activities and ensuring that requirements are being met. The committee structure described previously supports both staff and board members in completing tasks and effectively carrying out all required functions.

i. Membership roster

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

Governor Gina M. Raimondo

**BUSINESS MEMBERS (12)**

Mike Grey, Sodexo Food Service [GWB Board Chair]
Jordan Boslego, Sydney Providence and Quay
Maureen Boudreau, Johnson and Johnson
Stephanie Preston, Citizens Bank
Janet Raymond, Providence Chamber of Commerce
Karsten Hart, Newport Restaurant Group
Steve Kitchin, New England Institute of Technology
David Chenevert, RI Manufacturers Association
John Gregory, Northern RI Chamber of Commerce
Katelyn Pisano, Kenzan
Debbie Proffitt, Purvis Defense Systems
Susan Rittscher, Center for Women and Enterprise
GOVERNMENT REPRESENTATIVES (5)
Stefan Pryor, Rhode Island Commerce Corporation [GWB Board Vice Chair]
Scott Jensen, Department of Labor and Training
Julian Alssid, Community College of Rhode Island
Angelica Infante-Green, Department of Elementary and Secondary Education
Courtney Hawkins, Department of Human Services

WORKFORCE REPRESENTATIVES (6)
Organized Labor
George Nee, RI AFL-CIO
Paul Alvarez, UA Local 51
Paul MacDonald, Providence Central Federated Council
Robin Coia, New England Laborers Labor-Management Coop. Trust
Community
Mario Bueno, Progreso Latino
Cathy Doyle, Year Up

ii. Board Activities

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

The Governor’s Workforce Board manages its responsibilities via a highly responsive committee structure. An overview of this structure is presented above in section III (a)(1) of this plan. The GWB is staffed by six professionals including an executive director. The staff have responsibilities related to policy development, performance and accountability, career pathways, youth programming, and employer/sector partnerships. All new board members are provided with an orientation on the background, purposes, and responsibilities of the Board. Staff is responsible for day-to-day activities and ensuring that requirements are being met. The committee structure described previously supports both staff and board members in completing tasks and effectively carrying out all required functions.
4. Assessment and Evaluation of Programs and One-Stop Program Partners

A. Assessment of Core Programs

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

Rhode Island’s WIOA administrative agencies (Department of Labor and Training, Department of Education, Office of Rehabilitation Services) will use the primary indicators of performance specified in section 116(b) of WIOA and contained in State Performance Reports to assess the performance of the six core programs. Each program’s actual performance will be assessed in relation to the State adjusted levels of performance and revised State adjusted levels of performance. Rhode Island does not presently have additional indicators of performance, however as elaborated within the performance accountability section of the state plan, the state continues to explore and develop additional program measures to compliment those required by WIOA.

Performance assessment will utilize quarterly wage records to determine program quality and effectiveness with respect to outcomes including employment rates and median earnings for participants with a social security number that exited from one or more of the six core programs. Rhode Island will also assess the average cost of those participants who received career and training services, respectively, during the most recent program year, while considering relevant economic conditions and characteristics of participants.

The State Workforce Development Board will use the Local Area Performance Report broken down by local area for the WIOA Adult, Dislocated Worker, and Youth programs to determine each local area’s performance on the primary indicators with respect to local performance targets and will provide on-going evaluation of core program activities in order to promote continuous improvement.

B. ASSESSMENT OF ONE-STOP PROGRAM PARTNER PROGRAMS

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

Partner programs will be assessed based on their statutorily-required performance metrics and reporting requirements. Partner programs will be asked to make such reports available on request to workforce partners and the State Workforce Development Board and will also be assessed based on meeting other commitments outlined in MOUs. The State Board will review achievement of locally determined performance targets and measures of effectiveness. Along with these reviews, the State Board may review performance on specific matters such as services to individuals with barriers, customer satisfaction, program flexibility and alignment, and others. Rhode Island has two additional vehicles through which assessment and public accountability of One Stop Partner programs can occur. The State Board - Adult Education and
Employment Subcommittee is undergoing a restructuring that will position it as a critical lead in oversight, coordination, and direction of WIOA partners. This Committee will review partner program performance and responsiveness in a public forum and make recommendations to partner agencies and the full board when appropriate. The Interagency Workgroup - a multi-agency workgroup comprised of sub-cabinet level decisionmakers from all core and partner programs, as well the State Workforce Development Board is able to discuss performance and program delivery in a collaborative fashion and offers the opportunity for group problem-solving when necessary.

C. Previous Assessment Results

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

In late 2017, the State Workforce Development Board issued criteria for the development of local One Stop Certification. Local Board criteria and evaluation instruments were completed toward the end of 2017 and both local areas completed their certification processes for the state’s four one stop centers in 2018. Overall, the four One Stops met or exceeded certification criteria, with some exceptions that have since been address through corrective action.

Analysis of Program Year 2017 Title I results found that Rhode Island met or exceeded all statewide measures. Rhode Island remained generally pleased with statewide Title I performance for Program Year 2018 but observed a challenge in meeting Credential targets across all three Title I categories. This challenge was determined to relate to a ministerial error, not performance. Several statewide training and employment programs resulted in a credential yet were not reported as such. An internal project team within the state Department of Labor and Training has been assigned to research this matter and craft a correction action plan to resolve the reporting issue.
D. Evaluation

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

As part of its statutorily-mandated powers and duties, the State Workforce Development Board is charged with performance management and coordination of employment-and-training programs in the state. In that role, the Board conducts a number of evaluations and research efforts regarding workforce programming (WIOA core programs included). “DLTStat” is one such performance management tool that allows the Rhode Island Department of Labor and Training to continuously evaluate and promote improvement of the Core programs administered by the agency. DLTStat serves to increase communication between the program staff and executive layer of the department on the performance and day-to-day execution of key programs.

DLTStat sessions are lengthy and intense ‘deep dives’ into performance to determine what is working, what is not, and, if applicable, what needs to change. On a pilot basis, the Department has been evaluating its industry-sector training programs at monthly meetings - reviewing new hire placement wages, demographic and diversity figures, placement levels of participants by employer, education level of participants, and more. The purpose of the meeting is to hold program managers accountable while also collaboratively solving problems. This formal performance management program will continue to expand to include other workforce programming (WIOA core programs included) and is an effective vehicle to identify and overcome performance challenges as they arise.
5. Distribution of Funds for Core Programs

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

A. For Title I programs

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

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

Youth funds are formula allocated to local areas based on the criteria outlined in federal law in WIOA section 127(b)(1)(C)(ii). The three data factors utilized by the State for calculation of the formula are:

PART I: 33 1/3 percent shall be allocated on the basis of the relative number of unemployed individuals in areas of substantial unemployment in each Workforce Investment Area as compared to the total number of such unemployed individuals in all such areas of substantial unemployment in the State;

PART II: 33 1/3 percent shall be allocated on the basis of the relative excess number of unemployed individuals in each Workforce Investment Area as compared to the total excess number of unemployed individuals in all Workforce Investment Area in the State; and

PART III: 33 1/3 percent shall be allocated on the basis of the relative number of economically disadvantaged youth within each Workforce Investment Area as compared to the total number of economically disadvantaged youth in the State.

A hold harmless provision (establishing a 90% minimum of previous two fiscal years funding) prevents the very wide upward or downward swings in allocations from one year to the next that a pure application of formulas might bring.

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

Adult funds are formula allocated to local areas based on the criteria outlined in federal law in WIOA section 127(b)(1)(C)(ii).

PART I: 33 1/3 percent shall be allocated on the basis of the relative number of unemployed individuals residing in areas of substantial unemployment in each Workforce Investment Area as compared to the total number of such unemployed individuals in all such areas of substantial unemployment in the State

PART II: 33 1/3 percent shall be allocated on the basis of the relative excess number of unemployed individuals who reside in each Workforce Investment Area as compared to the total excess number of unemployed individuals in the State; and

PART III: 33 1/3 percent shall be allocated on the basis of the relative number of economically disadvantaged adults within each Workforce Investment Area as compared to the total number of economically disadvantaged adults in the State.
A hold harmless provision (establishing a 90% minimum of previous two fiscal years funding) prevents the very wide upward or downward swings in allocations from one year to the next that a pure application of formulas might bring.

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

Dislocated Worker funds are allocated to local areas based on the criteria outlined in federal law in WIOA section 127(b)(1)(C)(ii).

- Unemployment data;
- Unemployment concentrations;
- Plant closings and mass layoff data;
- Declining industries data;
- Farmer-rancher economic hardship data; and
- Long-term unemployment data

Because Rhode Island lacks sufficient data for the Farmer/Ranch Economic Hardship factor; no weight has been assigned to that category. The policy assigns a uniform 20% weight to each of the remaining five factors:

- Insured unemployment data 20%
- Unemployment concentrations 20%
- Plant closings and mass layoff data 20%
- Declining industries data 20%
- Long-term unemployment data 20%

A hold harmless provision (establishing a 90% minimum of previous two fiscal years funding) prevents the very wide upward or downward swings in allocations from one year to the next that a pure application of formulas might bring.
B. For Title II:

i. Multi-year grants or contracts

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

The application process is uniform, including a rubric which contains scoring criteria to ensure a standardized approach to the review and award process. Direct and equitable access to applying for these grants is ensured as the state requires that all grants and contracts are competed in the same manner, using the same processes and templates. A centralized online grant management system also allows for all grant and contract related announcements and communications to be made public and shared. Additionally, all pertinent information related to this and all grants and contracts is and will be made available on the state Department of Education website and provided to those in direct contact with the state agency. A bidder’s conference and an online state agency portal allow opportunities to ask questions about the grant opportunity. The state agency believes that through these mechanisms, direct and equitable access is affected. In awarding grants or contracts under Section 243, RIDE will consider the following, from Section 231(e):

1. The degree to which the provider would be responsive to regional needs as identified in the Local Plan and serving individuals in the community most in need of AEL activities, including individuals who have low levels of literacy skills or who are English language learners;

2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;

3. Past effectiveness of the provider in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in section 116, especially with respect to eligible individuals who have low levels of literacy;

4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108, as well as activities and 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 eligible provider’s activities, including whether reading, writing, speaking, mathematics and English language acquisition instruction delivered by the eligible provider are based on the best practices derived from the most rigorous research available and appropriate; including scientifically valid research and effective educational practice;
7. Whether the eligible provider’s activities effectively use technology, services, and delivery systems, including 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 eligible 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 eligible provider’s activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development opportunities, including through electronic means;

10. Whether the eligible provider’s activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways;

11. Whether the eligible provider’s activities offer flexible schedules and coordination with Federal, state, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

12. Whether the eligible provider maintains a high quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance;

13. Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

Each eligible provider desiring a grant or contract from RIDE shall submit an application to RIDE containing such information and assurances as RIDE may require, including:

A. A description of how funds awarded under this title will be spent consistent with the requirements of this title;

B. A description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;
C. A description of how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under title I, as appropriate;

D. A description of how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators;

E. A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;

F. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individuals; and

G. Any information that addresses the 13 considerations described under section 231(e), as applicable.

ii. Ensure direct and equitable access

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

Please refer to section 1.

C. Title IV Vocational Rehabilitation

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

Rhode Island has only one designated state unit for VR services that encompasses all populations and activities.
6. Program Data

A. Data Alignment and Integration

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

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

WIOA Core Programs are administered across several state agencies each with separate case management and performance data systems. The ability to align, integrate and ideally unify these information management systems has been a coveted yet elusive goal. All too often these separate systems represent major investments in infrastructure, contracts and staff training. Both WIOA and significant advancements in web-based technology hold promise. WIOA Adult, Dislocated Worker and Youth data systems are already integrated with Wagner-Peyser with the Rhode Island Department of Labor and Training (DLT). DLT utilizes an Management Information System (MIS) developed by Geographic Solutions Inc. (GeoSol) that integrates reporting and case management for these core programs as well as Trade Adjustment Assistance for Workers, Jobs for Veterans State Grant and other ETA programs. GeoSol has made the necessary enhancements and database changes needed to meet WIOA reporting and service delivery requirements. This includes the new reporting around eligible training providers.

Adult Education and Vocational Rehabilitation are located at the Departments of Education and Human Services respectively have their own systems of reporting. All core programs have a long history of working together to support each other’s’ data needs including the sharing of wage record information. However a true integrated system has never materialized. Given the data driven decision-making imperative within WIOA and the robust performance accountability standard Rhode Island will be holding itself, Rhode Island is considering a number of options that would permit agencies to keep existing databases while providing the opportunity to migrate data for the purposes of assessment and evaluation.
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.

As mentioned, the Department of Labor and Training MIS system already integrates four of the six core programs into one intake and client management system: WIOA Adult, Dislocated Worker, Youth, and Wagner-Peyser - as well as Trade Adjustment Assistance for Workers, Jobs for Veterans State Grant and other ETA programs. Currently, the Department of Education provides intake and client services for Adult Education programming through the Comprehensive Adult Literacy Information System (CALIS). The Office of Rehabilitation Services provides intake and client services for Vocational Rehabilitation programming through Libera System 7. While a single intake and client management system remains elusive; the three state agencies are party to a larger statewide effort for a comprehensive e-referral system. This proposed system would include the ability to transmit client data to the receiving service provider upon a referral. Such interoperability helps to achieve integrated and streamlined intake; even in the absence of a singular client management system. The three state agencies overseeing WIOA core programs will remain heavily engaged in the effort to develop the proposed e-referral system. That effort, combined with backend performance data migration initiatives described in section (i) above; can help Rhode Island substantially meet the vision and intent of WIOA as it relates to shared client intake and management.

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.

Data and Performance staff of the State Workforce Development Board is party to a number of statewide data governance and oversight bodies convened by the office of the Governor. The work of the State Workforce Development Board in promoting data uniformity and secure data sharing has been viewed as model to help other agencies adopt similar practices. The State Workforce Development Board has helped informed the development of template data sharing agreements along and responsibly advocates, when necessary, for policy changes as needed to establish data sharing agreements.

Sharing of client data and development of integrated client service models (such as the e-referral system described previously) will lead greater collaboration among providers and ensure that the range of services available to, and often needed by, the client will be made available to them seamlessly.
iv. Describe the State’s plans to develop and produce the reports required under section 116, performance accountability system. (WIOA section 116(d)(2)).

Historically, reporting processes for the WIOA Annual State Performance Report involved the Department of Labor and Training securely obtaining electronic files for each report period from the three State agencies for each of the six core programs. Individual records in each of these electronic program files are matched against the state Unemployment Insurance database. If a participant’s earnings and employment record was not included in the state database; that information was then queried against the national Wage Record Interchange System (WRIS). Earnings and Employment status data was then secured returned back to the sending agency for reporting purposes. Effective with the transition to the new State Wage Interchange System (SWIS); the Department of Education and the Office of Rehabilitation Services have respectively been designated as Performance Accountability and Customer Information Agencies (PACIAs) and will be responsible for querying their own interstate wage records.

The Department of Labor and Training is currently responsible for reporting wages, entered employment rates, and employment retention rates for individuals who exit in the Wagner-Peyser, Adult, Dislocated Worker, Youth, and Trade Adjustment Assistance programs. The Department is also responsible for collecting data and generating the Eligible Training Provider Performance Report required under WIOA.

Lastly, the State Workforce Development Board helps to aggregate employer service data and information from all three agencies before providing this information to the Department of Labor and Training staff to calculate Employer Penetration Rate. Similar analysis is conducted on the client earnings and employment information to determine Employer Retention. The Department of Labor and Training remains the lead agency in developing the Effectiveness in Serving Employers Report.

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

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

Rhode Island has invested a significant amount in its ability to track its participants longitudinally. Through several Workforce Data Quality Initiatives, Rhode Island has built out linked data systems between core partners and other state agencies to evaluate workforce development interventions over time. The longitudinally data system will serve as the primary vehicle for tracking and assessing the long-term progress of participants who exit core programs.

C. Use of Unemployment Insurance (UI) Wage Record Data

Explain how the State will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and labor market information, consistent with Federal and State law. (This Operational Planning element applies to core programs.)

As described in Section 6(A)(iv), Rhode Island uses both state wage record data and national Wage Record Interchange System (WRIS) [soon to be State Wage Interchange. System (SWIS)]; data to track and report on state and local performance measures. Historically, access to wage record information was limited to the Department of Labor and Training and Local Workforce Board staff. Effective with the transition to the new State Wage Interchange. System (SWIS); the Department of Education and the Office of Rehabilitation Services have respectively been designated as Performance Accountability and Customer Information Agencies (PACIAs) and will be responsible for querying their own interstate wage records. All partner agencies are governed by state laws and regulations related to information security and confidentiality, as well as applicable federal laws and requirements.

D. Privacy Safeguards

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

The State of Rhode Island takes its responsibility very seriously to protect the privacy of individuals and their personally-identifiable information (PII). Case managements systems, data transfer protocols, and sensitive document handling procedures administered by the Department of Education, Department of Labor and Training, and the Department of Human Services all comply with internal state data security and privacy requirements and include all requisite safeguards to comply with state and federal law.
EmployRI, the State’s Virtual One-stop and Case Management Information System, provides the highest level of confidentiality where required and conforms to federal law Sec. 205 [42 U.S.C.] (c) (C) (vii). The Virtual One-stop system supports the security standards recommended for State Employment Security Agencies by the Information Technology Support Center, College Park, Maryland. The system supports user name and password access. The user name determines the access level and whether a user may access certain services and confidential data. If a user does not have privileges to view certain data, these fields will not be shown.

To secure Virtual One-stop internet communications, a Secure Sockets Layer (SSL) encrypts a session between the server and the Web user. SSL is a highly reliable program layer for managing the security of message transmissions in a network. The programming for maintaining data confidentiality is contained in a program layer between an application such as Virtual One-stop and the Internet’s TCP/IP layers. The “sockets” part of the term refers to the socket methods of passing data back and forth between a client and a server program in a network or between program layers in the same computer. SSL uses the public-and-private key encryption system for RSA. This Internet authentication system uses an algorithm that also includes the use of a digital certificate. The following data is always encrypted when is accessed by a Virtual OneStop:

- Social Security Number
- Federal Employer Identifier Number
- Wage Records
- Individual benefits and public assistance Information
- User ID and Password

The controls in the Virtual One-stop Administration Site and the SSL method for security give the Virtual One-stop the means to protect confidential information and restrict access to that data. The state’s Virtual One-stop has been successful with these methods of security.
7. Priority of Service for Veterans

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

As required by 38 U.S.C 4215 (b) and 20 CFR part 1001 and 1010, Rhode Island ensures that all eligible veterans and covered persons receive priority access for all career service opportunities for which they qualify within the employment service delivery system and any sub-grantee funded in whole or in-part by the US Department of Labor. Rhode Island’s two local workforce development boards include the priority of service requirements in their local plans. Visible signage is posted in each of four American Job Centers (AJC) clearly describing service priority in an effort to encourage individuals to self-identify their veteran status. Furthermore, AJC staff are provided training by the Local Veteran Employment Representative (LVER) on a quarterly basis to review priority of service regulations, veteran referral processes and guidance on the “Initial Veteran Assessment Tool.”

At point of entry, AJC staff are required to verbally ask every customer which enters the center “Are you a veteran, spouse of a veteran or caregiver of a veteran.” When a veteran or eligible persons status is self-attested, all eligible veterans and eligible person are made aware of:

- Their entitlement to priority of service;
- The full array of employment, training and placement services available under priority of service; and
- Any applicable eligibility requirements for those programs and/or services

Subsequently, at the point of entry all eligible veterans or eligible persons are given opportunity to be screened by AJC staff member using the “Initial Veteran Assessment Tool.” When an eligible veteran or eligible person has indicated to one or more Significant Barriers to Employment (SBE) outlined in Veteran Program Letter (VPL) No. 03-14, VPL 03-14 Change 1 &2, VPL No. 04-14 and VPL No. 08-14, then a referral is made to a Disabled Veteran Outreach Specialist (DVOP) for intensive services and the AJC staff member will enter an “Initial assessment” in the Case Management Information System. As a result, oversight of priority of services to covered persons at point of entry will be monitored by the ETA 9002F quarterly report. In addition, the ETA 9002F report will indicate the percentages and total number of covered persons receiving staff-assisted services during the entry period, this report will be review and monitored for compliance.
In an event that a DVOP is unavailable the eligible veteran and/or eligible person is afforded the opportunity to be seen by next available AJC staff member. In addition, the eligible veteran and/or eligible person’s information is referred to the AJC managers who are responsible for ensuring he or she will be outreached by a DVOP for intensive services at a later time. If an eligible veteran and/or eligible persons, does not have the documentation verifying his or her eligibility for priority of service at a point of service, he or she is afforded access on priority base to all services provided by program staff (including an intensive service) while awaiting verification.

The state’s Virtual one Stop also includes content that explains priority of service, as well as provides veterans and eligible persons the opportunity to self-identify veteran status through virtual self-service registration. Questions are embedded at initial enrollment that will act as the screening tool to identify a Significant Barriers to Employment (SBE) outlined in Veteran Program Letter (VPL) No. 03-14, VPL 03-14 Change 1 &2, VPL No. 04-14 and VPL No. 08-14. When an eligible veteran or eligible person has indicated having one or more Significant Barriers to Employment (SBE) it will generate a notification that will be sent to the closes geographical located AJC to be outreached by a DVOP. For USDOL funded training at within the local AJCs, priority of service is given to veterans and eligible person over non-covered persons. AJC managers review all applicant files before approving an applicant’s training request. When reviewing training request, the AJC manager implements the priority of service procedure, as follows:

First, if there is a waiting list for the training, priority of service is awarded by requiring the veteran or eligible person go to the top of that list.
Second, the AJC manager applies priority of service up to the point at which an individual is both: a) approved for funding; and, b) accepted or enrolled in a training class. Therefore, once a non-covered person has been both approved for funding and accepted/enrolled in a training class, priority of service is not intended to allow a veteran or eligible person to “bump” the noncovered person from that training class.

The Veteran Service Coordinator will assist AJC managers in the verification process of veterans and/or eligible persons by providing expertise in veteran documents and priority of service. In such cases where a veteran or eligible person is unable to produce supporting documents at point of enrollment they will be able to gain access to training funds as a non-covered person until supportive documentation are verified. During this time, DVOP specialists and/or AJC staff members will continue to render career services to the veteran or eligible person per self-attestation as first indicated at point of entry. In addition, DVOP Specialist and AJC staff will provide assistance and provide these veterans or eligible persons with resources to recover these documents, while continuing providing services. Rhode Island also seeks to affirmatively conduct outreach and recruit of veterans for career services and programming. To that end, One Stop centers will be instructed to collaborate with regional veterans service organizations, as well as the state’s office of veterans affairs (http://www.vets.ri.gov/) to raise awareness and familiarity of available WIOA programming, as well the veterans service priority.
8. Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities

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

Rhode Island has a proud history of meeting or exceeding the compliance requirements of Section 188 of the Workforce Investment Act (which are now incorporated in Section 188 of WIOA), and the American’s with Disabilities Act of 1990. Rhode Island’s One Stop Career Centers (netWORKri Offices) are fully accessible and in compliance with both WIOA Section 188 regulations on non-discrimination and Rhode Island General Laws Section 28-5 Fair Employment Practices. Each One Stop Career Center has been monitored and inspected bi-annually by the Rhode Island Governor’s Commission on Disabilities and has been found to be in compliance.

Rhode Island has had policy in place for many years dictating that when deficiencies are identified, One Stops are informed in writing of the findings and a corrective action plan must put into place. There are currently no outstanding issues. The Department of Labor and Training has been committed to making One Stop Centers and programs more accessible to individuals with disabilities. Much of our Adaptive Technology has been upgraded using the Disability Employment Initiative Grant and the Office of Rehabilitation Services Assistive Technology Program. These Assessments of accessibility which allowed upgrades in Adaptive Technology and increased staff development when serving customers with disabilities. In addition, ORS funds space on a daily basis at each of the One Stops to accommodate Masters-Level vocational Rehabilitation Counselors from ORS working out of the One Stops. This relationship enables ORS clients to develop familiarity with the One Stop Services. Furthermore, the ORS Vocational Rehabilitation counselor is a referral resource and provides technical assistance to the One Stop Staff.

All of the centers provide universal access to their services including registration, skills assessment, career counseling, job search, assistance in filling out unemployment claims and evaluation of eligibility for training programs to people with disabilities. Alternate formats for all information and application materials are offered. These include large print documents and use of various assisted technology devices and tools including TTY, Captel, Zoom Text, Magnifier, Pocket Talkers, Jaws and Magic. All staff in the One-Stops have been trained on the use of these tools and educated as to methods of communicating all services to individuals with disabilities. ORS personnel are periodically enlisted to provide training on Disability related topics.
Rhode Island’s goal in WIOA services is to continue to improve training, employment opportunities and outcomes of adults with disabilities who are unemployed, underemployed, and/or receiving Social Security Disability insurance benefits. Staff training is an essential component to ensure compliance and maintain excellent customer service levels. Training has been provided by the RI Commission for the Deaf and Hard of Hearing about the ADA and issues concerning the Deaf and Hard of Hearing Community, as well as “Disability Discrimination and the ADA” presented by the RI Commission for Human Rights. In addition to Departmental trainings, the RI Department of Administration has held numerous trainings regarding diversity and inclusion.

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.

This 2020 plan places a strong prioritization on enhancing access of the One-Stop System for English Language learners. At present, Rhode Island’s One-Stop Centers provides assistive tools and informative posters in visible locations that indicate language proficiency assistance is available and free of charge. Staff at the One-Stops have been trained on LEP procedures and instructed to recognize individuals with LEP and disseminate appropriate information as needed.

- Language Identification Card: This process provides a Menu of Languages (over 150) that customers can identify and select their language of origin. The staff member has the ability to contact an interpreter immediately by telephone and start the translation process to begin services and help set up future appointments.

- Translation Services: Workforce Development programs have a list of available vendors to perform Interpretation and Translation services for individuals identified as Limited English Proficient Customers. Interpretation services for appointments and programs are available within 24 hours of the customer’s request.

- Internal Bi-lingual Staff: All Comprehensive One-Stop locations have limited Bilingual staff on hand for immediate assistance. Across the workforce network, the state will focus on increasing the number of bi-lingual and/or promoting and expanding partnerships with appropriate community-based organizations to improve the lingual and cultural competency of the workforce network.

- EmployRI Spanish Module: The state’s Virtual One Stop (EmployRI) is also available in Spanish for the benefit of the department’s Limited English Proficient customers.

- EmployRI Mobile App (Spanish): The state’s Virtual One Stop (EmployRI) Mobile app for both Apple (iOS) and Android mobile devices is available in both English and Spanish. The app makes it easier for job seekers to search and apply for jobs posted in EmployRI.
• Community Outreach and Cultural Competency: Each Local Area will be charged with demonstrating success in community engagement and outreach to increase the awareness and availability of services beyond the One Stop location and within the community. Emphasis will be placed on partnering with culturally competent organizations with trust and positive reputation within the state’s increasingly diverse communities, particularly English Language Learners.

Leveraging existing community assets, improved training, and technology; Rhode Island looks forward to continuing to enhance and simplify access to the One-Stop Delivery System for Individuals who are English Language Learners.

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.

Due to its geographic size and the centralization of many partner programs within certain state agencies, Rhode Island has established methods for undertaking combined planning efforts. These efforts were used to develop this state plan for the purposes of the Workforce Innovation and Opportunity Act. By statute, the Governor’s Workforce Board is empowered to oversee the coordination and strategic planning for the entire workforce development network. Governor Raimondo has further promoted the joint planning and coordination of strategies and goals relating to workforce and economic development among her cabinet members including; the Director of the Department of Labor and Training, the Director of the Department of Human Services, the Commissioner of Elementary and Secondary Education, and the Secretary of Commerce. The collaborative bodies provide sustained executive coordination and a mechanism for executive decision making to be responsive and timely in providing guidance to agency programs.

Below the cabinet level, joint planning occurs through the Interagency Coordination Workgroup. This workgroup is comprised of Senior Manager-level staff within each Department represented on the Board – positioned between frontline program delivery and Cabinet/director level policy making - that work together on:

• Policy development, review, and feedback
• Performance data sharing and submission
• Troubleshooting and cooperative problem solving
• Technical Assistance and best practices
• Strategic review and resource alignment
• System reform and innovation

Administrators are able coordinate technical details among programs and solve the internal policy challenges that do not require the attention of executive cabinet members.
In addition to the coordination within public agencies and among workforce boards, community organizations also hold monthly meetings to improve coordination among government programs and community partners. For example, the Workforce Alliance is body comprised of several adult education providers, community based organizations, such as the United Way, workforce intermediaries, organized labor, and state programs. This organization meets regularly to ensure community and government partners maintain open lines of communication, and coordinate services and initiatives to better provide the assistance needed by Rhode Islanders.

Efforts to coordinate the development of this combined state plan began in January 2018 through the Interagency Coordination Workgroup. The Workgroup assisted in the design of the strategic planning process and participated in the stakeholder input process that was undertaken across all partner programs. Focus groups and stakeholder listening sessions were conducted throughout Rhode Island to identify the strengths, weaknesses, challenges, and opportunities for the system. This feedback was synthesized by the State Workforce Development Board and disseminated to combined plan partners to help inform their respective contributions to the plan. Combined plan partners also reviewed draft versions of the goals and strategies and worked together on the development of Section III. Each program had the opportunity to review and comment on these sections of the plan prior to the publication for public comment.

V. COMMON ASSURANCES (for all core programs)

To be completed upon submission of state plan.
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.

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.

Rhode Island has designated two local workforce development areas with the state:

- Providence/Cranston Workforce Development Area (Workforce Solutions of Providence/Cranston) comprised of the cities of Providence and Cranston.
- Greater Rhode Island Development Workforce Area (The Workforce Partnership of Greater Rhode Island) comprised of the remaining cities and towns within the state of Rhode Island.

The collaboration between and among these local boards and the state board is already of such a nature that it meets the spirit and intent of “regional planning” as required under WIOA Section 106(a). Pursuant to state policy WIN 17-01 (https://gwb.ri.gov/wp-content/uploads/2017/06/17-03-6-15-2017.pdf?189db0) The State Workforce Board has determined based on geographic boundaries (Rhode Island is geographically the smallest state in the United States), Labor Market Area analysis, and funding and resource realities, that the state itself is a “region” for the purposes of regional planning and identification. The State Plan shall therefore also serve as a regional plan. Nevertheless, the Board will continue to consider the opportunity of regional intrastate planning in the future and may approach bordering states and local areas about the possibility of interstate regional planning as well.
(B) Describe the process used for designating local areas, including procedures for determining whether the local area met the criteria for “performed successfully” and “sustained fiscal integrity” in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions.

Rhode Island’s Local Workforce Development Area Designation policy mostly mirrors federal regulations as it relates to designation. Consistent with WIOA section 106(b)(4), the State Workforce Development Board, in consultation with Local Boards and chief local elected officials, will review all requests for local workforce development area designation using the procedures outlined in the policy, and will make a recommendation to the Governor. In reviewing new designation requests, the State Board shall evaluate the extent that requested areas meet the following:

1) Are consistent with labor market areas in the state;
2) Are consistent with regional economic development areas in the state; and
3) Have available the federal and non-federal resources necessary to effectively administer activities under provisions of WIOA, including whether the areas have the appropriate education and training providers, such as institutions of higher education and career and technical education schools.

WIOA section 106(b)(2) outlines the criteria by which a Governor must designate a local workforce development area under Initial Designation. WIOA section 106(b)(3) outlines the criteria by which a Governor must designate a local workforce development area under Subsequent Designation. The procedures for designating local workforce development areas are outlined below:

Initial Designation: For the first two full program year following the date of enactment of WIOA and clarified through the WIOA Final Rule to mean Program Years 2016 and 2017 (July 1, 2016-June 30, 2018), any area that was designated as a local area for the purposes of the Workforce Investment Act of 1998 for the 2-year period preceding the date of enactment of WIOA received initial designation provided they performed successfully, and sustained fiscal integrity. The State’s two local Workforce Development Boards both submitted requests for initial designation in November of 2015. A review of their submitted documentation of fiscal and programmatic records indicates that all of the above conditions had been met.

Subsequent Designation: After the period of Initial Designation, the Governor shall approve Subsequent Designation as a local workforce development area, if such area:

a. performed successfully;
b. sustained fiscal integrity; and

c. in the case of a local area in a planning region, met the requirements of planning regions outlined in WIOA [note: Pursuant to WIN 17-01; the state plan serves as a regional plan and the regional planning requirement does not apply to local areas]
Per section 106 (b)(3) of WIOA and 20 CFR 679.250, local areas are considered to have requested continued or subsequent designation unless the local area and chief elected official notifies the State indicating that they no longer seek designation. Therefore, it is not necessary for existing local areas to submit requests for designation.

The State will review the criteria for subsequent designation for local areas considered to request such designation. Under section 106 (b)(3) of WIOA, the State shall approve subsequent designation of a local workforce development area which met the criteria for subsequent designation. The State will notify the chief elected official(s) within 30 calendar days after the review indicating approval or denial of subsequent designation of the local workforce development area.

New Designation: The process outlined below is to be followed by a unit or units of local government seeking new designation of local workforce development areas under the WIOA:

Step 1. The local government unit(s) seeking designation of a local workforce development area(s) should coordinate and consult with the chief local elected officials of the local areas and existing local workforce investment boards.

Step 2. If a decision is made by the local government unit(s), in coordination with the chief local elected officials, to seek designation under the WIOA, the local government units must undertake a formal public comment period and provide documentation of the results of the formal public comment period with the designation request to partners, including existing local workforce investment boards. The formal comment period must allow for comments by businesses, labor organizations, institutions of higher education, community-based organizations, and the public at-large.

Step 3. The request for designation of a local workforce development area under the WIOA shall include the following information:
   a. How the proposed local workforce development area is aligned with labor market areas including information on growth industries and occupations in the local labor market.
   b. How the proposed local workforce development area is aligned with a regional economic development area within the state of Rhode Island.
   c. How the proposed local workforce development area can effectively administer activities under provisions of the WIOA with available federal and non-federal resources, including a description of area education and training providers, a description of how the available resources will be made available for training activities, and a description of the percentage of overall resources administered by the local area that will be dedicated to training activities.
Step 4. After submission of the designation request, the State Workforce Development Board will review the request and provide a recommendation for the Governor. As required by WIOA, the Governor will use the consultation of the Board and consult with chief local elected officials prior to designating local workforce development areas in the state. The Governor may rely on the submissions from the requestor(s) as meeting the requirement for consultation with chief local elected officials, including the public records of meetings and any recorded votes or resolutions regarding the designation request.

Step 5. Pursuant to WIOA section 106(b), the Governor may designate local workforce development areas in Rhode Island for two-year periods, as appropriate.

For the purpose of determining subsequent local workforce development area designation, the term “performed successfully” means the local workforce development area met or exceeded the adjusted levels of performance for primary indicators of performance for the last two consecutive years for which data are available, and that the local area has not failed the same measure for the last two consecutive program years. Sustained Fiscal Integrity for all program years means the Secretary of the United States Department of Labor has not made a formal determination that either the grant recipient or the administrative entity of the area misexpended funds due to willful disregard of the requirements of the provision involved, gross negligence or failure to comply with accepted standards of administration for the two-year period preceding the determination.

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

Rhode Island’s Local Workforce Development Area Designation appeal policy mostly mirrors federal regulations. Pursuant to section 106 (b)(5) of WIOA and 20 CFR 683.630, if the State denies designation of a local area, the chief elected official(s) may appeal the decision through the following appeals process:

a. Within 14 days from the date of receipt of the notice of denial, the chief elected official(s) may file an appeal to the State Board by submitting in writing all of the following information:
   i. a statement that the chief elected official(s) is appealing the denial of designation;
   ii. the reason(s) why the local area should be designated;
   iii. signature of the chief elected official(s).

b. The appeal shall be submitted in writing.

c. Pursuant to 20 CFR 679.290 (b) and 20 CFR 683.630 (a), the State Board will provide the parties with the opportunity for a hearing, review the appeal, and make a ruling on the appeal within 60 days after the submission of the appeal.

The State Board shall notify the chief elected official(s) in writing, of its decision on whether or not to approve designation of an area as a local area under section 106(b)(3) of WIOA and 20 C.F.R. 679.250.
In the event the State Board denies the appeal or fails to issue a decision within 60 days of the date the appeal is submitted, the chief elected official(s) may further appeal the State Board's decision or lack thereof to the U.S. Department of Labor (USDOL). Pursuant to 20 CFR 683.640, appeals made to USDOL, must be filed no later than 30 days after receipt of written notification of the denial from the State. The appeal must be submitted by certified mail, with return receipt requested, to the following address:

Secretary, U.S. Department of Labor
200 Constitution Ave. N.W.
Washington, D.C. 20210
Attention: ASET

The appellant must establish in its appeal to USDOL that the appellant was not accorded procedural rights under this appeal process, or that it meets the requirements for designation. The appellant must provide a copy of the appeal to the State Board at the same time that the appellant sends the appeal to USDOL.

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

A local area, or a local area on behalf of a partner agency, may appeal the Governor’s determination of the portion of funds to be provided for infrastructure costs, to the State Workforce Development Board.

1. An appeal must be in writing and filed with the State Workforce Development Board within fourteen (14) days after notification of the decision.
2. The appeal must contain a specific statement of the grounds upon which the appeal is sought.
3. The State board will have 60 days to review the appeal and make a recommendation to the Governor.
4. The review will take into account information provided in the appeal on the basis that such determination is inconsistent with the requirements of state policy and/or WIOA Section 121(h).
5. The final decision rests with the Governor.
6. If the final decision of any appeal reverses the prior decision, it will become effective as of July 1st of the program year.
(2) Statewide Activities.

(E) Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities.

Per state statute, the State Workforce Development Board is the state’s primary policy-making body on workforce development matters. In that role, the Board oversees and coordinates both federal workforce development policy (through implementation of WIOA) and state workforce development policy (through allocation of the state-level Job Development Fund). The Job Development Fund is a restricted receipt fund allocated from the state’s Unemployment Insurance fund. Under state statute the rulemaking and authority to issue policies governing the use of state funds for workforce investment activities rests with the State Board. Policies and guidances governing the workforce development system may be found on the State Workforce Development Website (https://gwb.ri.gov/policy-and-planning) All of the partner agencies also follow Rhode Island State Laws and procurement principles which can be found at: http://www.purchasing.ri.gov/StateAgencyInfoCenter/DocsForms/Purchasing%20Regulations.pdf.

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

The guiding principles that will inform the use of Governor’s set-aside funds are three-fold. First, is the continued focus on developing and supporting demand-driven workforce development strategies such as the Real Jobs RI industry partnership program, as consistent with the terms of WIOA section 134 (a)(3)(A)(i). This priority will help grow the capacity of these workforce intermediaries and support the implementation of a comprehensive sector-based strategy. In addition, Rhode Island plans to also use formula funding to support the training of eligible individuals participating in sector-based training programs as designed by and offered through these industry partnerships. Emphasis will be placed on supporting customer-centered solutions when implementing the opportunities under WIOA. Lastly, Rhode Island is committed to driving system improvement with its state resources, including the effective execution of the required activities under the law. With these priorities in mind, Rhode Island reserves the right to maximize its flexibility to support Governor’s agenda with the set-aside funds.

Rhode Island Rapid Response policy may be viewed at: https://gwb.ri.gov/wp-content/uploads/2017/06/RapidResponse.Policy.04192018.pdf?504763. Rhode Island’s Rapid Response Program, administered by the Rhode Island Department of Labor and Training’s Workforce Development Services Division, proactively responds to layoffs and plant closings by quickly coordinating services and providing immediate aid to companies and their affected workers. The Rapid Response Unit works with employers and employee representative(s) to maximize public and private resources quickly and to minimize disruption associated with job loss. Rapid Response staff members conduct on-site services when possible to disseminate information on accessing unemployment insurance benefits, One Stop Career Center re-employment services and state- and federally-funded training opportunities. Other on-site services include job fairs and customized re-employment workshops, such as resume
development and interviewing strategies. Email distribution lists of Dislocated Workers are formed to provide immediate information and reemployment opportunities to these individuals. Additionally, mailings will be sent out to notify those without computer access. Rapid Response activities have and can also be scheduled utilizing the One Stop Career Centers. For those companies affected by increased imports or shifts to production out of the United States, Rapid Response staff members provide information about the Trade Adjustment Act (TAA), Reemployment Trade Adjustment Assistance RTAA, and Health Coverage Tax Credit (HCTC) programs. Layoff aversion and business retention strategies are practiced as part of the scope of work for Rapid Response as a function of the Workforce Development Services Division. The Business Service Representatives continually work on relationship building with the employer community to support them throughout all business cycles. Workshare has been a very popular and often used program by businesses experiencing a downturn in business. Joint visits to employers by the RI Department of Labor and Training Business Service Unit and other economic resources entities such as the RI Commerce and Small Business Development Corporations are conducted regularly initiated by outreach as a result of employer requests.

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

The most important aspect to providing an effective response during a disaster event is fast and broad-based coordination with local and national partners. Local partners in Rhode Island include municipalities, town organizations like the Rhode Island League of Cities and Towns, and State agencies. The State agencies involved in natural disaster relief efforts are notably the Rhode Island Emergency Management Agency, which is the lead State agency for statewide disaster response activities, the Office of the Governor, the Department of Transportation, and the Executive Office of Health Human Services. National partners include the National Guard and Federal Emergency Management Agency (FEMA), particularly as it relates to National Dislocated Worker Grants (DWGs).

In the event of a natural disaster the Rapid Response team will coordinates with these partners in order to determine the needs of those affected and the resources available. When responding to a natural disaster, the state will follow the WIOA dislocated worker and DWG guidelines. Disaster DWG funds are sought to provide funding to create temporary employment opportunities to assist with clean-up, recovery, and other humanitarian efforts in one of three situations. First, when an area impacted by disaster is declared eligible for public assistance by FEMA; second, when another federal agency with jurisdiction recognizes the disaster as one of national significance that could result in a potentially large loss of employment; and third, when a substantial number of individuals, defined as 50 or more, relocate to another area from a disaster area. The Rhode Island Department of Labor and Training is the agency eligible to apply for a Disaster DWG in Rhode Island, because it is designated to receive Dislocated Worker formula funds. In addition, the Department of Labor and Training is the fiscal agent responsible for the appropriate allocation of funding to the affected areas. As such, the Rapid Response Team carries out its disaster response within the parameters of the Disaster DWG guidelines, and in coordination with state and national entities.
(H) Describe how the State provides early intervention (e.g., Rapid Response) to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A).) This description must include how the State disseminates benefit information to provide trade-affected workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the trade-affected dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the State will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition.

As the administrator of Trade Adjustment Assistance Act services, the Rhode Island Department of Labor and Training’s Workforce Development Services division is able to quickly address the needs of trade-affected workers. As part of Rapid Response services, WDS staff gather information from the workers and employers to determine whether Trade Adjustment Assistance may be applicable. If that is the case, then the Department files a petition on behalf of the trade-affected workers to request an eligibility verification from USDOL, and receives either a certification or denial. When a federal TAA petition certification is granted, the Department notifies workers in writing of the federal certification of the TAA petition, and informs the workers of the services to which they are entitled. The Department also organizes public informational presentations on the workforce development services available to workers, and the ability of the One Stop staff to assist them with reemployment. The Department will inform impacted workers of these presentations by directly contacting workers by letter, email, or phone, by issuing press releases, and posting notices on the DLT website. The Department works to ensure that TAA workers are informed of and receive every service available, including co-enrollment in the WIOA dislocated worker and other programs. These services include case management through the provision of basic and individualized career services through WIOA. The focus is on skill-assessment and retraining workers who need further skills in order to obtain employment in emerging, in-demand occupations. As the WIOA Title I administrator, the Department is especially well placed to ensure the alignment and coordination of funds and activities between WIOA adult and dislocated worker programs, and the statewide Rapid Response activities. This is due to the administration of the Rapid Response outreach events, including job fairs or hiring events, by the same Department responsible for administering the WIOA adult and dislocated worker programs. The Department is consequently able to leverage WIOA Title I program resource in response to a layoff or facility closure. This dual-program role enables the Department to combine dislocated worker activities with TAA activities for trade-affected workers, helping to avoid duplication of services.
(b) Adult and Dislocated Worker Program Requirements.

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

There are various types of work-based training models utilized throughout the Rhode Island workforce development network, including on-the-job training (OJT), subsidized work experiences, apprenticeships, and customized training. Subsidized work experiences, such as those funded through the state Work Immersion program, are a type of work based learning that are time-limited, subsidized work experiences intended for individuals with barriers to employment. The goal of this model is to establish a work history for the individual in order to demonstrate their success in the workplace, and to develop skills that will lead to their entry into and retention in unsubsidized employment, either with the employer hosting the work experience or elsewhere.

As part of the state’s strategy to take demand-driven workforce programming to scale, all work based learning models are considered available to employers based on their need. Industry intermediaries will be able to use such models funded by the Adult and Dislocated Worker programs as part of the package of services necessary to address employer demand. Rhode Island recognizes that no one model fits every training situation. As a result, the state will selectively utilize these strategies based on the current needs of employers and based on the workforce industry.
(2) Registered Apprenticeship. Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., job center staff taking applications and conducting assessments).

Rhode Island is proud to be a leading state in the effort to expand new and innovative apprenticeship models. As a recipient of $5 Million apprenticeship grant under the American Apprenticeship Initiative, Rhode Island has created an apprenticeship intermediary, Apprenticeship RI to provide technical assistance to any sponsor seeking to register a program. Rhode Island also provides direct development funding to employer and other organizations through the state-funded Non-Trade Apprenticeship Development Grant program. This grant program provides up to $25,000 to cover costs such as curriculum development, supplies, consultants, meetings, and other expenses associated with developing apprenticeships in high-growth, high-demand fields. Lastly, the state’s Apprenticeship Incentive program offers $1,000 per registered non-trade apprentice (up to five within a 12-month period), payable after the apprentice has completed the probationary period. The payment provides direct resources to help offset the cost of sponsoring an apprentice and is designed to encourage “early adopters” of such models. Apprenticeship is viewed as a critical tool within the statewide workforce strategy and the state strongly encourages our employer and industry sector partnerships to consider the model as an effective solution to meet the needs of the industries in Rhode Island.

In addition to the alignment of apprenticeship with the larger sector strategy work, Rhode Island is also aligning the policy making structure of registered apprenticeship with workforce development. Connecting Registered apprenticeship and workforce development efforts is helping Rhode Island to expand apprenticeship into new industries while simplifying the administrative process of registering an apprenticeship. Under the state Eligible Training Provider List policy, Registered Apprenticeship program sponsors are automatically eligible for placement on the state-approved ETPL and are not subject to the same application and performance information requirements as other providers, in part because they have already gone through the vetting process to become a Registered Apprenticeship program.

Rhode Island recognizes that Registered Apprenticeships are an important component of training and employment services that the workforce system can provide to its customers. Local service providers will be expected to consider apprenticeship and pre-apprenticeship as a career pathway for job seekers and as a job-driven strategy for employers and industries. Local plans will be asked to address the inclusion of apprentice as an integral part of the work-based learning options that WIOA customers may access. The state will provide training, technical assistance and access to USDOL’s apprenticeship resources to encourage and foster the use of existing programs. Lastly, the State Workforce Development Board intends to issue policies and guidance on the most effective implementation of Registered Apprenticeship including the strategic use of pre-apprenticeships, Individual Training Accounts and On-the-Job Training awards to customers who wish to start or complete an apprenticeship program.
(3) Training Provider Eligibility Procedure. Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

Eligibility of Providers
Types of Entities: In order to receive WIOA title 1-B funds, eligible providers shall be at least one of the following types of entities:

1) Institutions of higher education that provide a program which leads to a recognized post-secondary credential. Entities requiring approval by the RI Board of Governors for Higher Education under R.I.G.L. §16-40 are considered eligible under this section.

2) Entities that carry out programs registered under the National Apprenticeship Act 29 U.S.C. 50 et seq.). Registered Apprenticeship Programs can request to be added to the Eligible Training Provider List during their registration process with the Office of Apprenticeship. Once a Registered Apprenticeship Program has indicated that they desire to be placed on the ETPL, they will automatically be included in the State’s ETPL and are not subject to the same application and performance requirements or to a period of initial eligibility or initial eligibility procedures. Performance data on Registered Apprenticeship programs will be provided by the State Apprenticeship Agency. Once on the State Eligible Training Provider list, Registered Apprenticeship programs will be included and maintained on the list for as long as the program remains registered under the National Apprenticeship Act or until the program sponsor notifies the State that it no longer wants to be included on the list. Pre-Apprenticeship programs do not have the same automatic ETP status. [20 CFR §680.470; ETA TEGL 41-14 sec. 8(a)]

3) Other public or private providers of a program of training services, which may include joint labor-management organizations and eligible providers of adult education and literacy activities under Title II if such activities are provided in combination with occupational skills training. This includes Community Based Organizations (CBOs) or private organizations of demonstrated effectiveness that provide training under contract with the LWDB. [ETA TEGL No. 41-14 sec. 4]

4) LWDBs, if they meet the conditions of WIOA sec. 107(g)(1).

Training Provider Qualifications
Licensing/Accreditation: Eligible Training Providers must be licensed by the appropriate Rhode Island or federal licensing authority, as required both by Rhode Island and Federal law. Training providers must be in good standing and compliant with all other state and federal regulatory agencies following:

A. Specific occupations have governing boards that issue licenses, such as the RI Department of Health, RI Division of Motor Vehicles, and others. Training providers must be licensed by the appropriate governing board to offer training for the occupation.

B. Private post-secondary institutions and training providers must be approved by a federal or RI authority such as the RI Office of Postsecondary Commissioner.
a. The RI Council on Postsecondary Education has approval authority for private/nonprofit degree-granting institutions not specifically exempted by statute or legislative action and approval authority.

b. Nonprofit organizations that do not solely or primarily exist to provide education or training are not covered under this requirement. The determination that an entity holds such status is solely related to its ETPL eligibility and is not an indication that the entity is otherwise exempt from or not subject to RI Council on Postsecondary Education or RI office of Postsecondary Commissioner requirements. To establish status as a nonprofit organization not primarily or solely operated to provide education or training for ETPL eligibility purposes, an entity must provide:
   i. Internal Revenue Service (IRS) documentation indicating appropriate tax exempt status;
   ii. The organization’s mission statement, articles of incorporation, or other evidence of organizing principles evidencing that the entity’s primary purpose is other than education or training; and
   iii. A signed attestation indicating that the majority of the entity’s operations relate to activities other than education or training.

Licensed/Accredited Training Providers not eligible to be on the ETPL include but are not limited to:
A. Training providers that are debarred by any state or the federal government during the debarment period;
B. Private post-secondary training providers, who apply for a RI Private Postsecondary license and are denied due to a determination that the training program is not vocational in nature.

Business Requirements
A. Training providers must be a legal entity, registered to do business in the State of Rhode Island.
B. Training providers must have provided training services during all of the 12 months prior to applying for the ETPL and have a proven track record of students successfully completing the programs. This provision does not apply to Registered Apprenticeship programs.
C. Training providers are required to have refund policies specifying when refunds for tuition and other costs associated with the training program will be allowed. Refund policies that indicate that no refunds will be made are not acceptable. Refund policies must be written and published so that students are aware of how to request a refund.
D. Training providers must have a grievance policy which provides for due process for students to file complaints with an organization against faculty, staff, or other employees. Grievance policies must be written and published so that students are aware of how to file a complaint.
E. Training providers must have a form of general liability insurance. General Liability Insurance is defined as a standard insurance policy issued to business organization to protect against liability claims for bodily injury (BI) and property damage (PD) arising out of premises, operations, products, and completed operations; and advertising and personal injury (PI) liability. If the nature of the organization is “all other Public or Private Provider of Training”, this certificate must be current and provide “insurance coverage as may be required by any federal or state applicable laws and/or the Workforce arising out the operation of this agreement”. Upon expiration of the certificate, the provider must submit a new certificate to the designated ETPL agency.

F. Training providers must establish, publish, and disseminate to students materials including, but not limited to, official catalogs and other materials. Training providers must provide to students, and to prospective students, information that is complete and accurate. The information provided must be sufficient to enable prospective students to make rational decisions about enrolling in the school and to enable enrolled students to understand their rights and responsibilities as students in the school.

G. A training provider’s financial capacity must be appropriate to its scale of operations. The school must demonstrate, principally from its annual comprehensive financial statements, and from other financial information, that it has adequate capability to satisfy its contractual obligation to students, including the capability to provide the programs and services described in its official publications and to meet its financial obligations.

H. Training providers must comply with non-discrimination and equal opportunity provisions of all federal and state applicable laws including but not limited to:
   a. Regulations under Section 188 of the Workforce Innovation and Opportunity Act of 2014;
   b. 29 CFR 37, Title VI of the Civil Rights Act of 1964;
   c. Age Discrimination Act of 1998;
   d. Sections 504 and 508 of the Rehabilitation Act of 1973;
   e. Title IX of the Education Amendments of 1972;
   f. Title II Subpart A of the American with Disabilities Act of 1990; and

Eligibility of Program of Training Services
Definition: A program of training services must be delivered in person, online, or in a blended approach that includes one or more courses, or a structured regimen that leads to:
   a) A recognized post-secondary credential, secondary school diploma or its equivalent,
   b) Employment, or
   c) Measurable skill gains toward such a credential or employment.
The Employment and Training Administration (ETA) defines a measurable skills gain as one of the following types of gains; 1) Educational Functioning Level (EFL), 2) Secondary Transcript/Report Card, 3) Training Milestone, 4) Skills Progression, and 5) Other Recognized Credential.

Apprenticeship Programs
Under WIOA Title I-B, Registered Apprenticeship Programs are considered eligible programs of training services that meet one or more of the criteria defined above. Once on the State eligible provider list, registered apprenticeship programs will be included and maintained on the list for as long as the program remains registered under the National Apprenticeship Act or until the program sponsor notifies the State that it no longer wants to be included on the list. Pre-Apprenticeship programs do not have the same automatic ETP status. Pre-Apprenticeship programs are, therefore, subject to the eligibility requirements outlined in this policy.

Technology-Based Learning
Training providers using technology-based learning, also referred to as distance, online, web-based or computer-based learning, must meet the following requirements:
   a) Training providers offering distance learning programs must be licensed to provide training in the State of Rhode Island.
   b) Training providers must have a mechanism for student interaction with an instructor or instructors.
   c) Training providers must ensure periodic assessment of each student.
   d) Training providers’ policy must describe the responsibilities of each party (training provider, participant) to the distance learning experience.
   e) Training providers must have a mechanism in place for tracking student’s participation in the ETPL Training program.
   f) Training providers must comply with any additional requirements determined by the LWDB.

Program Quality
WIOA mandates that providers of education and training meet certain specified performance levels. This performance information is required to ensure customers can effectively evaluate the quality of each training program. The performance and cost information that training providers must submit for their program(s) to be identified as eligible for WIOA funding is essential for ensuring consumers are able to make informed decisions on types of training that will lead to their individual success. Factors determining quality of a training program include:
   A) the degree in which the training program relates to in-demand industry sectors and occupations;
   B) length and cost;
   C) training delivery method including reasonable access to individuals who are employed and individuals with barriers to employment, and the ability to access the training program in rural areas;
D) credentials - how they are valued by an employer, and how they are associated with specific occupations;
E) training program completion rates
F) performance as defined by participant outcome information, taking into consideration the characteristics of the population served and relevant economic conditions, and information specifying the percentage of such participants who entered unsubsidized employment in an occupation related to the program, to the extent practicable.

Criteria for Eligibility
State Criteria - In establishing criteria pursuant to WIOA sec. 122(b)(1), the State shall take into account each of the following:

i. Performance Accountability and Outcomes
ii. Ensure access to training services throughout the State (including use of technology)
iii. Dissemination of Performance Outcomes and training information
iv. Training must lead to “In-Demand” industry occupations and sectors
v. State licensing requirements and licensing status of providers
vi. Encouragement of industry recognized certifications
vii. Provider’s ability to offer a credential
viii. Quality of training
ix. Ability to serve individuals with barriers
x. Other, including:
   a. Compliance
   b. Informed Choice
   c. Ability to meet the needs of local employers and participants
   d. Accountability
      i. Collection of information required to demonstrate compliance with the criteria is not unduly burdensome or costly to providers.

Local Criteria: Local Workforce Development Boards may establish criteria and information requirements in addition to the criteria and information requirements established by the State or may require higher levels of performance than required by the State for purposes of determining the eligibility of providers of training services to receive funds. The criteria set by each Local Workforce Development Board will be described in their corresponding policy and contract.

Solicitation:
The State and each Local Workforce Development Board may solicit an invitation to training providers to submit applications to apply for status as approved training providers. This solicitation may be done through a combination of direct mailings, newspaper notices and other appropriate means. The State and the LWDBs may also solicit training providers from outside of the local area, including other states. The State will be responsible for ensuring that
the training providers have access to the forms for making application and to a list of demand occupations for its area. The application will be reviewed by the ETPL Application Team, consisting of members from the LWDB, the ETPL Coordinator, and DLT management.

Inquiries: If a student expresses an interest in a provider and the provider is an eligible entity but is not currently on the list, the State shall make an effort to reach out to the provider. An interested Provider that is currently not on the list can also inquire with the State. Inquiries can be directed to:

Rhode Island Department of Labor and Training
ETPL Office
1511 Pontiac Avenue, Building 73-3
Cranston, Rhode Island 02920
Phone (401) 462-8860

Publication of List [ETA TEGL 41-14 sec. 10]
WIOA requires that the State disseminate the statewide list of eligible training providers and accompanying performance and cost information to LWDBs and to members of the public. The State of Rhode Island will post the list on its Virtual One-Stop System. Individuals, counselors, and providers will have direct access to the list.

Training providers will appear on the statewide list after the State verifies the eligibility. As new programs are submitted and approved throughout the year, the statewide list will be updated on an ongoing basis. If the program is removed from the statewide list, the LWDB will cease to approve additional Individual Training Accounts for that program and the ineligible program will be removed from the statewide list.

The State eligible training provider list must be accompanied by appropriate information to assist participants in choosing employment and training activities. Such information must include the following, disaggregated by local areas served, as applicable:

- Recognized post-secondary credential(s) offered;
- Provider information supplied to meet the State’s eligibility procedure;
- Performance and cost information aligned with the time periods; and,
- Additional information is determined by the State as follows:
  - Program Length including number of units such as credits, hours, weeks or semesters needed to earn the credentials offered.
  - Program Service/Location and type
  - Class/Faculty Size
  - Program Pre-requisites
  - Target Occupations
  - Program Description, and
  - Additional information as deemed appropriate.
Procedure

Initial Eligibility: All providers and programs that have not previously been eligible to provide training services under WIOA sec. 122 or WIA sec. 134, except for registered apprenticeship programs, must submit required information to be considered for initial eligibility. The requirements to become an eligible provider of training services apply to all organizations providing WIOA Title I-B training to adults and dislocated workers, with the specific exception of Registered Apprenticeship programs. For Registered Apprenticeship programs, WIOA makes a change from WIA in that Registered Apprenticeship programs must be included upon request and maintained on the list of eligible training providers for as long as the program remains registered.

Application Process

Determining ETPL eligibility is a two tier approach. First, the training provider must be an eligible entity to apply for the ETPL and secondly, the training programs offered by the training provider must meet eligibility and performance criteria to be listed on the ETPL. Under WIOA Title I-B, a training provider must provide verifiable program-specific information based on criteria established by state. The application process for initial eligibility on the ETPL is as follows:

1. The Training Provider must submit an online application on the State’s website: www.dlt.ri.gov/wio/ApplicationInfo.htm. The provider must submit any required supporting documents via standard mail, or by electronically uploading the documents into the online application. The provider application will include the following required information:
   a. At least one or more factors for performance [refer to section III for details on performance information];
   b. A description of the degree in which the training provider is in partnership with a business. This could include information about the quality and quantity of employer partnerships;
   c. A description of the accessibility of all training programs pertaining to physical access, programmatic process, and communications. This includes but is not limited to location, delivery of service, and access for individuals with barriers;
   d. Other documentation as needed [refer to section IV for list of Documentation Needed]

2. An initial review is conducted by the State’s ETPL Coordinator to determine if the Training Provider is an eligible entity.

3. Once the Training Provider is deemed an eligible entity, the Training Provider will receive log-on credentials for the State’s virtual one-stop system.

4. The Training Provider will then be instructed to submit each desired program for program approved through the virtual one-stop system.

5. The application is scored by the ETPL Application Team through the use of a standard ETPL Rubric. Rubric Components include factors determining quality of a training program as indicated in Section I-A:
a. Performance Data  
b. Partnership(s) with Employer(s)  
c. In-Demand Occupation/Industry  
d. Credential obtained upon completion  
e. Accessibility of Program  

6. A determination of eligibility letter will be sent to the training provider.  
   a. If approved, a WIOA Eligible Training Provider Agreement and Approved Program  
      List Addendum (ETPL Contract) is sent by the State’s ETPL Coordinator to the  
      provider with 30 days of the provider application submittal. Once the contract is  
      signed, the State will disseminate the new program listing on the State’s website  
      and virtual one-stop system.  
   b. If denied, the training provider has the right to appeal or reapply when ready.  

Process for Registered Apprenticeship Inclusion on the List  
The inclusion process for a Registered Apprenticeship begins once a Registered Apprenticeship  
program has indicated that they desire to be placed on the ETPL. At that time, the Registered  
Apprenticeship program must supply the following information to the Department of Labor and  
Training:  
   1. Occupations included in the RA program  
   2. The name and address of the RA program sponsor  
   3. The name and address of related technical instruction provider and location of  
      instruction if different from the sponsor address  
   4. The method and length of instruction and,  
   5. The number of active apprentices  

The Registered Apprenticeship program will automatically be included in the State’s Eligible  
Provider List (ETPL) and are not subject to the same application and performance requirements  
or to a period of initial eligibility or initial eligibility procedures. Performance data on Registered  
Apprenticeship programs will be provided by the State Apprenticeship Agency. Once on the  
State eligible provider list, Registered Apprenticeship programs will be included and maintained  
on the list for as long as the program remains registered under the National Apprenticeship Act  
or until the program sponsor notifies the State that it no longer wants to be included on the list.  
Pre-Apprenticeship programs do not have the same automatic ETP status. [20 CFR §680.470;  
ETA TEGL 41-14 sec. 8(a)]  

Initial Period of Eligibility for Approved Programs  
Initial eligibility will be granted for a 12-month period once approved by the State. After the  
initial period of eligibility, the training provider is subject to continuing eligibility requirements  
outlined in section II - B.
Continued Eligibility

Eligible training providers that were determined to be initially-eligible under WIOA title I-B will be subject to the application procedure for continued eligibility when their initial year of eligibility expires.

Application Process

Initially eligible providers of training services must submit a reapplication on the State’s virtual one-stop system for each program for which recertification is sought 1 month prior to the expiration of the initial period of eligibility. The training provider must confirm all detailed program information listed. To maintain eligibility status, training providers must submit to the State, at such time, in such manner and containing such information as the State may request to adequately prepare the performance information for each training program for which continued eligibility is being sought. In determining continuing eligibility status, the State takes into consideration the following elements:

1. Changes in Organization/Provider Info:
   a. Business requirements
   b. Accreditation/licensure renewals, if needed
   c. Updated Certificate of Insurance
   d. Updates and/or changes in refund or grievance policies, if any;

2. Changes in Program Information:
   a. Schedule changes
   b. Curriculum updates
   c. Match against In-Demand List
   d. Credential offered
   e. Review of business partners that affect the program; and

3. The performance of providers of training services on the performance accountability measures described in WIOA sec 116(b)(2)(A)(i)(I-IV). This includes the timeliness and accuracy of the eligible training provider’s performance reports. The State reserves the right to establish minimum performance standards. Until the performance data for all accountability measure is available, the State may take into account alternate factors related to performance for that accountability measure. Once training providers have two years of performance outcomes using the WIOA performance indicators specified in section 116, the State will take them into account.

Other factors taken into consideration when determining eligibility include:

1. Specific economic, geographic and demographic factors in the local area for which providers are seeking continued eligibility; and

2. Characteristics of the populations served, including demonstrated difficulties in serving these populations.

Upon completed review of factors above, the State will determine if the program maintains eligibility. A continuing eligibility determination letter will be sent to the training provider. Continued eligibility status will be confirmed through the virtual one-stop system.
continuing eligibility review must be conducted at least once every two years from the first continuing eligibility review.

Continuing Eligibility Review for Registered Apprenticeship Programs
Registered Apprenticeship Programs who have initially indicated their desire to be placed on the ETPL are not subject to the same continuing eligibility and performance requirements of the State’s ETPL policy. The biennial review of the provider eligibility will include verification of the registration status of registered apprenticeship programs and removal of any registered apprenticeship programs as described in 20 CFR sec 680.470. Performance data on Registered Apprenticeship programs will be provided by the State Apprenticeship Agency. Once on the State eligible provider list, Registered Apprenticeship Programs will be included and maintained on the list for as long as the program remains registered under the National Apprenticeship Act or until the program sponsor notifies the State that it no longer wants to be included on the list. Pre-Apprenticeship programs do not have the same automatic ETP status. [20 CFR §680.470; ETA TEGL 41-14 sec. 8(a)]

Provision [Act Sec. 122(b)(4)(E)]
The provider shall provide the information described in this policy to the State and LWDB in a manner that will permit the State and LWDB to make a decision on inclusion of the provider on the list of eligible providers.

Documentation Needed
The provider must meet all State and Local criteria listed in section I of this document. The information requirements established require that a provider of training services submit appropriate, accurate, and timely information to the State, to enable the State to disseminate information that assist participants in choosing providers.

Approval or Exemption Letter from Oversight Agency
Pursuant to WIOA sec 122(b)(1), state licensing and accreditation status of providers are a required state criteria in determining an eligible entity. An approval or exemption letter from oversight agency must be supplied at time of application. For example: A private postsecondary institution must be approved or exempted by the RI Office of Postsecondary Commissioner.

Financial Statements.
The determination will consist of checking liquidity and solvency ratios over 2-years’ time or in relation to assets and liabilities. A copy of a Profit and Loss Statement, Balance Sheet or Statement of Financial Position, A Financial Audit, or other financial document that would detail the financial soundness of the organization will be accepted. If revenues are $700,000 or more, A133 Audited Financial Statements are required.
Certificate of Liability of Insurance.
General Liability insurance is defined as a standard insurance policy issued to business organization to protect against liability claims for bodily injury (BI) and property damage (PD) arising out of premises, operations, products, and completed operations; and advertising and personal injury (PI) liability. If the nature of the organization is “all other Public or Private Provider of Training”, this certificate must be current and provide “insurance coverage as may be required by any federal or state applicable laws and/or the Workforce arising out of the operation of this agreement.” Upon expiration of the certificate, the provider must submit a new certificate.

Refund Policy
A refund policy must establish general guidelines, document circumstances in which a refund will be given for tuition, fees, or other costs, and clearly define the refund process for over-invoicing or for services not provided.

Grievance Policy
A training provider must have an established grievance policy to provide a process for the effective management and resolution of concerns, disagreements or complaints arising out of premises, operations, products, and completed operations.

Published Course Catalog or Program Brochure
The catalog and/or brochure MUST be available to the public and prospective students and must include the following:

1. All fees required to be paid by students including tuition, required fees, books, supplies, activities, and all other program costs. Providers must ensure that the cost of training to WIOA students does not differ from the training cost charged to non-WIOA students;
2. Educational program details and curricula;
3. Course cancellation policies.
4. All other student policies and procedures promulgated by the school, including those required by state or federal regulations.

The catalog and/or brochure must be submitted in electronic form or hard copy. The student policies can be submitted separately from the catalog and/or brochure but must be an official document that is available to the public and prospective students.

W-9 Form
A W-9 form must be submitted at time of initial application and every two years thereafter in order to file the Tax Payer Identification Number and Certification for tax purposes.
Performance

Required Information: The State will collect performance data from eligible training providers for all students as well as WIOA participants in ETPL eligible training programs annually and/or upon request. Reportable elements include:

i. The percentage of all program participants who are in unsubsidized employment during the second quarter after exit from the program;

ii. The percentage of all program participants who are in unsubsidized employment during the fourth quarter after exit from the program;

iii. The median earnings of all program participants who are in unsubsidized employment during the second quarter after exit from the program;

iv. The percentage of program participants who obtain a recognized postsecondary credential or a secondary school diploma or its recognized equivalent (subject to indicators relating to credential in WIOA sec 116(b)(2)(iii));

This information will be self-reported by the training provider to the State in the aggregate using a digital reporting portal. As part of its ETPL Monitoring process, the Department of Labor and Training will randomly audit the information reported by select providers to ensure it is accurate and that the methodology to collect, compile, and report this information is reasonable, secure, and effective.

Insufficient Performance Information
Of those entities applying for eligibility, if the training provider does not have the required performance data, it must 1) show good cause and 2) provide alternate information that demonstrates compliance with State and Local eligibility criteria. “Good cause” should include:

i. The training program is new and data on past performance is not available;

ii. Only partial performance data is available;

iii. Collection of data will cause excessive costs and/or hardship for the training provider during the initial eligibility; and/or

iv. Other reasonable circumstances that may cause data to be unavailable.

If the required and alternate information cannot be provided, DLT will provide technical assistance to allow the provider an opportunity to demonstrate its ability to meet eligibility criteria. DLT will assist the provider in developing a plan of action with an appropriate timeline to be determined on an individual basis. If the provider is not responsive or unable to meet the requirements set forth by the agreement, the provider may be found ineligible.
Alternate Performance Information
Until the performance data for each accountability measure is available, the State may take into account alternate factors related to performance for that accountability measure if the information is substantially similar to the information otherwise required. In considering alternate factors related to performance the State may set minimal performance criteria, use existing available data, or develop other proxies as appropriate. Once training providers have two years of performance outcomes using the WIOA performance indicators specified in section 116, the providers will be expected to supply the originally required information. Supplemental data may include documentation on self-employment and self-reported earnings, a copy of a W-2 form or pay stub that documents employment during the time period in the measure.

Program Costs
An eligible training provider must make available to the prospective students its schedules of tuition and fees. The institution shall disclose all fees required to be paid by students (including tuition, required fees, books supplies, activities, etc.), and any non-refundable fees must be so identified. A reduction in tuition, fees or other charges may be implemented when there are specific criteria for student eligibility and selection procedures precisely disclosed within the policy at the institution. All students within the enrollment period that the reduction is offered shall be eligible to apply. The cost of the training to WIOA participants must not exceed the cost charged to any other student in the program. All costs necessary for successful completion of a program must be clearly stated. A breakdown of cost must be identified for publication on the ETPL. A breakdown may include the following:

i. Tuition
ii. Fees
iii. Books
iv. Licensing cost
v. Certificate fees
vi. Graduation fees
vii. Uniforms
viii. Tools
ix. Registration fees
x. Supplies

Notice of Ineligibility, Suspension, or Termination
Initial Eligibility Denials: A training provider or program may be denied initial eligibility for the following reasons:

1. The application is not complete or information was not provided in a timely manner;
2. The training provider does not meet the WIOA definition of an eligible training entity;
3. The training program does not meet the WIOA definition of eligible training services.
4. The training program does not result in a recognized credential;
5. Performance data is not included with the application.
6. The training program does not support in-demand occupations and/or sectors identified through labor market analysis;
7. The training provider is not in compliance with the WIOA statute, regulations, or any agreement executed under WIOA;
8. The State or LWDB determines that the training provider intentionally supplied inaccurate information.

Reapplication
When a training provider or program is denied for any reason other than lack of documentation or information, the provider must wait six months to reapply.

Denial Notice
Within 10 days after the State determines that a training provider’s application does not meet the eligibility criteria, the State shall issue a denial notice to the training provider. The notice shall be mailed to the training provider at the address listed on the application and to the attention of the contact person identified on the application. The notice shall clearly:
1. Display the “date mailed”;
2. Identify the program that was denied or terminated;
3. State specific reason(s) for the action; and
4. State the training provider has the right to appeal to within 30 calendar days of the date the notice is mailed.

Suspension/Removal
Removal of Training Programs: A training program may be removed from the ETPL for the following reasons:
1. The State determines that the training provider supplied inaccurate information;
2. The training program no longer meets the WIOA definition of occupational skills training;
3. The program does not meet minimum performance standards once established. If there are no students enrolled in the training program during the past year, there will be no performance data to review for continued eligibility. The State must examine the demand for the related occupation to determine if there is still a demand for it and decide whether to keep the program on the ETPL for another year.

Removal of Training Providers: A training provider may be removed from the ETPL for the following reasons:
1. Intentionally supplying inaccurate or false information;
2. Substantially violating a provision of title I of WIOA or its implementing regulations;
3. Failure to meet required performance outcomes;
4. Failure to abide by the equal opportunity and nondiscrimination requirements under WIOA Section 188;
5. Failure to comply with monitoring and audits;
6. Failure to maintain required licenses and accreditation requirements;
7. Failure to comply with all applicable provisions in the ETPL contract; or
8. Other just cause.

Notification and Termination Letter
Within 10 days after the State determines that a training provider is in violation of any of the reasons indicated above a notice of violation or finding shall be issued by the State requiring the development of a corrective action plan. The letter should include what the violation or finding is, an invitation to develop a corrective action plan, and a specific timeframe of 14 days to respond to the notification. If the training provider fails to respond to the letter, a termination letter will then be issued. The termination notice shall be mailed to the training provider at the address listed on the application and to the attention of the contact person identified on the application. The notice shall clearly:
1. Display the “date mailed”
2. Identify the violation or finding;
3. State specific reason(s) for the action; and
4. State the training provider has the right to appeal to within 30 calendar days of the date the notice is mailed. When a training program is removed from the State ETPL, WIOA participants currently enrolled in the program may complete their training as outlined in their WIOA Individual Employment Plan unless the program or provider has lost state licensing, certification, or authorization to operate by the appropriate state oversight agency.

Corrective Action
Purpose of Corrective Action Plan
The State and the Eligible Training Provider must develop a corrective action plan if the provider is found in violation of their contract, or if the provider is requesting technical assistance to become compliant.

Prior to Plan Development
If the provider is found in violation of the contract, the State must identify the finding and how it was acquired. Examples include but are not limited to LWDB’s monitoring report, State’s compliance and monitoring report, continuing eligibility review, and information reported through an anonymous tip or random review; i.e. secret shopper, Secretary of State website check, or other means that provides evidence of potential non-compliance with ETPL contract provisions or ETPL policy.

Identify which law or provision is being violated. Gather supporting documents to determine if the finding is an allegation or a factual finding. This will determine whether the provider can continue to receive referrals during CAP process or not.

Notification Letter
The State sends a letter via mail notifying the Training Provider of the finding. The letter should include what the violation or allegation is, an invitation to develop a corrective action plan, and a specific timeframe to respond to the notification. If the training provider chooses not to respond to the letter, they are confirming their decision to withdraw participation from the ETPL.
Development of CAP
The training provider, with assistance from the State, must develop a corrective action plan (CAP). The CAP will serve as a reapplication and should contain the following:
  i. Details of discussion; date, time, method of communication (phone, meeting, etc.), persons involved in discussion, and any other relevant details;
  ii. Description of circumstances;
  iii. Description of steps that will be taken to rectify the situation, including procedural changes that prevent reoccurrence;
  iv. Appropriate timeframe to completion/resolution

Depending on severity of issue timeframes may vary. An evaluation of progress must be periodically conducted.

Repayment of Program Funds
A provider of training services whose eligibility is terminated due to the aforementioned termination causes shall be liable for the repayment of funds of all adult, dislocated worker, and youth funds received under Title I-B of WIOA or WIA during the period of non-compliance. [Ref. Act Sec 122(f)(1)(C)] No repayment funds should be collected from the training provider until the opportunity to appeal is over which is 90 days from the date of the initial denial notice.

Appeal Process
Following issuance of a denial of eligibility, determination of suspension, determination of eligibility for status as a nonprofit organization not primarily operated to provide education or training, or termination of eligibility - the training provider will have 30 days in which to submit an appeal to the Governors Workforce Board. Within 30 days of the receipt of the appeal, the training provider will be notified of the date, time, and place where a due process hearing will be conducted. After that hearing a decision will be issued within 30 days. All appeals must be forwarded, in writing, to the following address:

Rhode Island Department of Labor and Training
Governor’s Workforce Board RI
1511 Pontiac Avenue, Building 72-2
Cranston, Rhode Island 02920
Phone (401) 462-8860 Fax (401) 462-8865
(4) Describe how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program.

Rhode Island’s Priority of Service policy may be viewed at: https://gwb.ri.gov/wp-content/uploads/2017/06/18-03-Priority-of-Service.pdf?504763. Rhode Island intends to utilize existing monitoring functions which include conducting onsite reviews, desk audits of participant data, and providing technical assistance if priority is not met. Further, the state will collaborate closely with our combined program partners to ensure those receiving public assistance are referred to programs and services available. Lastly, Title I programs will work with each Local Area on their required community engagement and outreach strategies including, but not limited to, partnering with community-based organizations, identifying community leaders/champions, and working with their area school districts to increase the awareness and availability of services within low-income communities.

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

Rhode Island’s Title I Transfer policy may be viewed at: https://gwb.ri.gov/wp-content/uploads/2018/06/Title-I-Transfer-Policy.pdf?504763. Under that policy, Local Workforce Development Boards may transfer up to 100% of the base Adult and Dislocated Worker allocations of the current year allocation. Youth funds may not be transferred. Transfer requests are to be signed by the Local Board Chair and Executive Director, submitted to the State Workforce Development Board Executive Director and must include the following information: (1) The reason for the transfer request, including current service level information, (2) Assurances that services for Adults and Dislocated Workers will be maintained, and (3) a listing of other Local Area funding available to serve Adult and Dislocated Worker populations (for example: NDWG, other federal or state funding, other special grant funding). Once the request has been received by the Board, it will be reviewed within five business days to determine approval or denial of the request. At the beginning of each program year, the State WIOA Liaison shall request, in writing, authority from the Governor to serve as his or her designee and act on his or her behalf for the purposes of this policy. If such authority is not granted, transfer requests shall be submitted to the Governor directly and must include the required information. A Governor may request additional information from Local Boards before rendering a decision.
(c) Youth Program Requirements. With respect to youth workforce investment activities authorized in section 129 of WIOA—

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

In addition to ensuring the grantees have the fiscal and administrative capacity necessary for providing the contracted services, local boards will use the following criteria to award grants for youth workforce activities.

- The grantee must be able to provide or refer to all 14 elements as defined in Youth WIOA
- The grantee must be able to create an Individual Service Strategy (ISS) for each youth, in alignment with the career pathway strategy described in the strategic elements section of this plan.
- The grantee must be able to provide the following sequence of services in order to ensure that all participants receive comprehensive and individualized services consistent with the WIOA requirements:
  - Outreach and Recruitment
  - Intake and Eligibility Determination
  - Assessment and Referral
  - Case Management and Individual Service Strategy Development
  - Access to a Range of Services
  - Follow-Up Services
- The grantee must respond to the following additional program priorities:
  - Prioritize the needs of opportunity youth, older youth ages 16-24 who are disconnected from school and work
  - High-quality work-based learning accompanied by work readiness training and the opportunity to build essential skills through a scaffolded learning process.
  - A career pathway model, with a structured sequence of activities that focus on providing participating youth with long-term career development services that lead to unsubsidized employment in industries with projected growth and the potential for wage progression.

Meeting the performance accountability measures will be part of the contract between the local boards and the grantee. Regular reporting and monitoring will keep the local boards informed of the performance of the grantee and any grantee not performing will receive technical assistance to improve performance.
2) Describe the strategies the State will use to achieve improved outcomes for out-of-school youth as described in 129(a)(1)(B), including how it will leverage and align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available.

Using the PrepareRI effort as a springboard; Rhode Island will seek to expand outcomes for out-of-school youth by sustaining and building partnerships with organizations and programs that have previously served out-of-school youth or are currently serving out-of-school youth, and that are able to refer out-of-school to WIOA Title I-B Youth programming. Rhode Island will also encourage a focus on older out-of-school youth with limited connections to the workforce. These partnerships will help to increase awareness of the WIOA Youth Program and services available in the community and increase the number of youth who apply for and receive services. To expand and increase the quality of referrals, the State Workforce Development Board will examine other state programs that are providing services to out-of-school youth, such as Temporary Assistance for Needy Families (TANF) and the Department of Children, Youth, and Families, and establish informal, and potentially formal procedures for each program to refer youth clients to the WIOA Title I-B Youth Program. Rhode Island will continue to expand partnerships with organizations that focus on youth with specific barriers to employment. For example, informational seminars and presentations may be provided to organizations that directly or indirectly serve runaways and homeless youth, pregnant and parenting youth, subjects of the juvenile justice system, youth in foster care, and organizations that provide services to youth with disabilities. Rhode Island hopes to focus efforts on serving youth most in need, and services provided will increase positive outcomes for these youth and young adults. Lastly, the State Education and Employment Advisory Committee will continue to play a critical leading role in oversight, coordination, and direction of WIOA partners, including programs focused on young adults, specifically out-of-school youth. This Committee will offer a forum for public accountability for performance and will continuously review and strategize on how to best achieve positive outcomes for out-of-school youth.

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

The state of Rhode Island will ensure that all elements within section 129(c)(2) are effectively implemented by offering progressive and innovative technical assistance to all program participants and stakeholders. It is highly important to the state that youth program partners have full assistance in providing effective services to eligible youth across the state. The Rhode Island state government will monitor and oversee all aspects of these services and programs to determine the most effective factors in providing employment training interventions to participants. Additionally, close monitoring of these programs will shed light onto those areas in which the state can reduce inefficiency and waste while recognizing where it can remove unnecessary red tape for program partners.
(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.

In 2018 the state workforce development board, in concert with local boards, community advocates, and youth providers, developed an additional assistance policy that recognizes two ‘types’ of barriers a youth can face which requires additional assistance to overcome: Education and Employment barriers. This remains in effect.

Education barriers include factors such as chronic absenteeism, below average academic performance, falling behind on graduation expectations, or financial/transportation challenges interfering with attendance.

Employment barriers include never holding a job (older youth), repeated failure to secure employment within a 60 day period, loss of employment in the last 30 day period, and family history of chronic unemployment or reliance on public assistance.

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<th>Additional Assistance - Educational Barriers</th>
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<td>• Has missed 18 or more days of school in the most recent academic year (secondary only)</td>
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<td>• In school (secondary or postsecondary) with a GPA of less than 2.0.</td>
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<td>OSY</td>
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<td>• Has left educational program because of transportation or financial situation (secondary only)</td>
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<tr>
<th>Additional Assistance - Employment Barriers</th>
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<tr>
<td>In-School and Out-of School Youth</td>
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<tr>
<td>• One or more grade levels below age appropriate level</td>
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• Has never held a job
• Has had two or more employment interviews without being hired in past 60 days
• Has lost employment placement in past 30 days
• Has a family history of chronic unemployment, including long-term public assistance.
The State of Rhode Island Education Act Title 16-19-1(a)(b) defines the criteria of compulsory attendance for Rhode Island youth. These criteria are as followed:

“(a) Every child who has completed or will have completed six (6) years of life on or before September 1 of any school year and has not completed eighteen (18) years of life shall regularly attend some public day school during all the days and hours that the public schools are in session in the city or town in which the child resides.”

(b) A waiver to the compulsory attendance requirement may be granted by the superintendent only upon proof that the pupil is sixteen (16) years of age or older and has an alternative learning plan for obtaining either a high school diploma or its equivalent.

(1)Alternative learning plans shall include age-appropriate academic rigor and the flexibility to incorporate the pupil's interests and manner of learning. These plans may include, but are not limited to, such components or combination of components of extended learning opportunities as independent study, private instruction, performing groups, internships, community service, apprenticeships, and online courses that are currently funded and available to the school department and/or the community.

(2)Alternative learning plans shall be developed, and amended if necessary, in consultation with the pupil, a school guidance counselor, the school principal and at least one parent or guardian of the pupil, and submitted to the superintendent for approval.

(3)If the superintendent does not approve the alternative learning plan, the parent or guardian of the pupil may appeal such decision to the school committee. A parent or guardian may appeal the decision of the school committee to the commissioner of education pursuant to chapter 39 of title 16.”

Rhode Island will be using the definition of Basic Skills Deficient as contained in WIOA Section 3(5)(B)
(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)).

Element not applicable to Rhode Island.

(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;

The State of Rhode Island is seeking a waiver from the definition outlined described at WIOA Sec. 129 (c)(4) and refined in TEGL 21-16 relating to allowable expenditures that may be counted toward the 20% Youth Work Experience expenditure requirement.

WIOA Section 129(c)(4) requires that not less than 20% of the funds allocated to the local area under the Title I Youth program shall be used to provide youth with paid and unpaid work experiences that have as a component academic and occupational education.

TEGL No. 8-15 and TEGL 21-16 describe the allowable expenditures that may be counted toward the 20% work experience expenditure requirement. Those guidance letters clarify that program expenditures on the work experience program element can be more than just wages paid to youth in the work experience. However, TEGL 21-16 declares that Supportive services (such as transportation, child care, dependent care, housing, and other services that are necessary to enable an individual to participate in a work experience) are a separate program element and cannot be counted toward the work experience expenditure requirement even if supportive services assist the youth in participating in the work experience.

Rhode Island believes that support services that directly relate to the youth’s ability to participate in the work experience such as uniforms, tools, and employment-related travel are essential to the work experience just as they are to actual employment and should be counted toward the 20% Youth Work Experience expenditure requirement. Such expenditures are not required for participation in all WIOA activities, but relate specifically to the work experience. Rhode Island believes recognizing such costs as work experience expenditures is an accurate representation of that expenditure priority.
(2) Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;

There are currently no state or local statutory or regulatory barriers to implementing the requested waiver.

(3) Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;

Goals and outcomes related to this waiver request include:

- More accurate reporting of Youth work experience expenditures
- Assurance that youth with barriers to participating in a work experience will have the supports necessary for completion

(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.

This waiver aligns well with the Department of Labor priorities to promote work-based learning and promote work readiness among youth. By revising the definition of allowable work experience expenditures, the state can provide a more complete package of assistance and service to help a greater share of youth, particularly youth with barriers, participate in such experiences.

(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;

Local areas will benefit from a more accurate reporting and treatment of work experience related expenditures. Youth in need of support services as a condition to completing a work experience will benefit from the increased certainty that such resources will be made available as they fall within the amount ‘earmarked’ for high quality and impactful work experiences.

(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. 

Annual WIOA programmatic reviews will include an evaluation of how this and all waivers are impacting local programs and performance. 

Notice of this proposed waiver has been shared with the Chairs and Executive Directors of both Local Boards. Should the waiver be granted, notice will be disseminated to both local areas as well as other impacted partners as necessary. 

This waiver requests was included with the state WIOA Plan when posted to the State Workforce Development Board’s website for comment and review by the general public. Any comment received will be reviewed for applicability and, if determined appropriate, forwarded to the USDOL. 

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

Rhode Island is prepared to provide this information if requested.
WAGNER-PEYSER ACT PROGRAM (Employment Services)

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

The State recognizes the value and importance of providing high quality customer service to both our employer and job seeker customers. The RI Department of Labor’s Workforce Development Services Division (WDS) continually assesses and evaluates the current skills and abilities of One-Stop Staff in successfully performing their various job duties. Training is provided in an ongoing manner to meet the continuing professional development needs of our One-Stop Staff. WDS continues to provide in house training to staff on standard business service knowledge, programs and competencies across state agencies providing a variety of services and programs to the State’s employer community. WDS continues to ensure that One-Stop management and staff have current knowledge and understanding of the local, state and national economic trends as it continues to implement demand-driven programs and services. Specific areas of professional development are:

1. Labor Exchange: WDS continually reviews and evaluates the skills required to improve staff abilities to conduct job seeker and employer services such as workshops, one-on-one counseling, conducting public presentations and providing exceptional customer service. These skills are essential to providing job seekers the necessary understanding and utilization of the services available to them through the State’s Workforce Development System.

2. Labor Market Information (LMI): WDS provides in house training in the area of labor market information to staff to better assist customers in understanding skill levels of in demand jobs and how to identify transferrable skills or the need to upgrade current skills to meet the needs of employers. It also assists staff and customers in identifying salary demands and industry trends. Staff and customers will gain knowledge of how to research companies and better prepare for an interview or salary negotiation. The State had invested in tools to help in this effort.

3. Effective Use of Tools: One-Stop Staff have been trained and continue to be trained on utilization of the EmployRI (Virtual One-Stop System) including demonstration of how to better assist job seekers in job search methods, skills assessment and job matching as well as labor market information on industry trends and career growth and salary projections to help customers make more informed decisions on employment and training. Staff are trained to provide better understanding of identifying and highlighting skills in resumes as they relate to the demand-driven job descriptions.
4. Business and Demand-Driven Technologies: Professional staff development includes continuing on-line and classroom training in EmployRI usage. One-Stop Staff are trained to interact with employers to assist in job postings, resume search and recruitments. Staff are trained to disseminate employer needs to customers in a timely manner to meet the demand-driven needs of the employer. The latest tools and techniques are provided to enhance employer engagement and help to better direct job seekers to quality jobs.

5. Technology: WDS provides professional development to staff regarding upgrades in IT resources to be kept up to date regarding the most effective use of the latest technologies. This includes classroom training in the latest version of MS Office, continual webinars and classroom training on the most effective use of the EmployRI system and use of labor market information. All staff in the One-Stops have been trained on the use of Adaptive Technology (AT) and educated as to methods of communicating all services to individuals with disabilities. Adaptive Technology includes use of various AT devices and tools including TTY, Captel, Zoom Text, Magnifier, Pocket Talkers, Jaws and Magic.

6. Social Media & Electronic Communication: Staff are trained to assist job seekers with the latest technology and techniques such as enhancing their electronic communication skills including an understanding of appropriate email usage, applying to jobs through on-line applications, use of social media including LinkedIn and other related sites to market their skills to employers. Staff disseminate to job seekers the latest information regarding how an employer will review an applicant’s Internet profile when applying to their company. Staff are trained to enhance their use of electronic communication to job seekers through the latest email techniques to improve staff’s outreach to job seekers for the purposes of doing targeted recruitments and connecting those job seekers to the appropriate employers.

The State is committed to continuing to provide current professional development activities and training to all staff with in the Rhode Island Workforce Development System.

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

The RI Department of Labor and Training (DLT) is a fully integrated and interconnected workforce development system. DLT oversees or is contracted to manage most of Workforce Development programs including Unemployment Insurance (UI) Title I, Workforce Innovation and Opportunity Act (WIOA), and the Wagner Peyser/Employment Services funded through the U.S. Department of Labor (USDOL). DLT continuously works to improve internal and external communication and integration through the Rhode Island Workforce Development System.
Rhode Island Department of Labor and Training has identified liaisons in each division that assists in training and development of all One-Stop Career Center staff.

DLT provides training to all One-Stop Career Center staff regarding the identification of potential UI eligibility issues. Career Center staff have been trained to recognize UI eligibility issues and refer if necessary to UI staff for adjudication. DLT has put protocols in place to instruct on how to report potential UI eligibility issues for adjudication. When OneStop staff become aware of a potential UI eligibility issues that are outside of the RESEA process the Adjudication Division is notified immediately of an eligibility issue.

(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.

Each of the state’s four (4) One-Stop locations have computers available in a resource area for individuals during business hours and these may be utilized to file unemployment compensation claims. The state accepts claims online and staff members are available in the resource area throughout the day to assist customers with questions and in completing the online UI claim form. Additionally, UI has a help website setup where customers can request assistance beyond simple questions related to filing a claim and in the larger One-Stops, this online help site is accessible through a dedicated UI Help Kiosk that allows customers to send their questions and/or requests for callback or UI assistance to UI without having to wait for an available computer in the resource area.

The State has ensured that there has been and will continue to be on-site assistance at One-Stops to give meaningful assistance to individuals who are filing UI claims. One-Stops have a dedicated bank of computers and telephone lines that are available and accessible to any customer that needs assistance filing a UI claim. One-Stops have dedicated kiosks that connect to UI for customers to be able to request information and a call back. One-Stop staff will work with Rapid Response teams to provide services to employers and workers in mass layoff situations and disseminate claims filing information.

Effective services will be provided to Veterans who file for benefits under the Unemployment Compensation for Ex-Service members (UCX). The State is moving to create a collaboration between UI Programs and WDS services to ensure the State’s Veteran’s population has a smooth transition from the military to civilian life. This will insure that UCX claimants have better exposure to jobs and reemployment services and fully leverage existing resources. WDS will ensure that claimants are fully notified of deadlines and eligibility requirements associated with TRA, Alternative Trade Adjustment Assistance (ATAA), Reemployment Trade Adjustment Assistance (RTAA) programs, and that communication with case managers for TAA is seamless.
One-Stop staff are trained to provide information and meaningful assistance to all individuals in filing UI Claims. In addition, staff are trained to recognize individuals who lack computer skills and proactively offer one-on-one assistance in filing UI claims. Staff are also trained to recognize individuals with Limited English Proficiency (LEP) and individuals with disabilities and assist them in filing UI claims through the use of assistive tools and technology for LEP and individuals with disabilities.

One-Stops have procedures in place to assist customers having difficulty or needing immediate assistance for UI issues.

(c) Describe the State’s strategy for providing reemployment assistance to UI claimants and other unemployed individuals.

The State has conducted the Reemployment Services and Eligibility Assessment (RESEA) program (previously REA) since 2005 and continues to do so. Currently under the program, all UCX claimants and UI claimants deemed most likely to exhaust benefits (based on profiling scores) are directed to report to the One-Stops for mandatory participation in RESEA. The program focuses on providing participants with an overview of and access to the services available at the One-Stop Centers as well as through the state’s Virtual One-Stop (EmployRI), a detailed review of the claimant’s responsibilities while collecting UI, and assistance accessing the resources necessary to lessen the time on unemployment and to return to work as quickly as possible. The program also mandates each participant receives two one-on-one sessions with a One-Stop staff member in addition to participation in additional reemployment services. Over the course of the two one-on-one meetings, UI Eligibility Reviews are conducted, staff reviews the claimant’s work search, provides detailed labor market information, assists with job matching, conducts a skills gap analysis, reviews claimant’s resume, assists claimant in registering with and accessing the Virtual One-Stop, schedules each claimant for additional reemployment services including workshops and/or training, and makes referrals to UI adjudication as appropriate.

Since August 31, 2014, the UI Division has required claimants (except those meeting specific exemption criteria) to post their resume in the state’s Virtual One-Stop (EmployRI) by the 6th consecutive week of collecting UI benefits. To comply, claimants are required to be registered on EmployRI and utilize the system to create or upload a resume. Posting a resume on EmployRI allows Employers utilizing the system to conduct talent searches of UI claimants and allows claimants access to additional features including skills assessments, LMI, an automated job search tool (Virtual Recruiter) that sends automated messages regarding potential jobs that are a match to the criteria the user has defined, and other job search and reemployment resources. Claimants are also advised through call center and website messaging as well as printed media that they may take advantage of services provided at the state’s One-Stop Career Centers.
Additionally, for claimants not referred to the One-Stops through RESEA and any other unemployed individuals, the state uses various media formats including print, television, and social media to communicate job openings, job fairs and training opportunities. Messaging on specific job openings refer customers to the Virtual One-Stop to apply while job fair communications provide location information, including instructions to visit a One-Stop Center when appropriate, and each weekend the state has an advertisement in the local newspaper that details scheduled job fairs and training opportunities, directing those interested to the One-Stop center. These types of outreach provided the initial contact for individuals to interact with the state’s One-Stop system and allow Staff, through face-to-face and electronic interaction to provide reemployment assistance to these individuals. Any individual may also register on EmployRI and take advantage of all of the self-service reemployment tools available on the site.

(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;

After filing a claim, UI claimants are advised via mail of work search requirements and other pertinent information regarding their claim. The materials in this mailing advise claimants of the existence of the state’s One-Stop offices and invites them to visit the office for job search assistance and reemployment services. Claimants are required to post their resume on EmployRI and use of that system to do so triggers the claimant’s WP enrollment, after which, their active enrollment and existence of a resume allows staff to conduct job matching and referrals to positions for the claimants. Additionally, claimants selected for RESEA are mandated to visit the One-Stop center for reemployment services and are informed of additional services the One-Stop provides that they can access under Wagner-Peyser. After completion of RESEA claimants who have not yet returned to work are encouraged to continue their interaction with the One-Stop system, both in-person and virtually which continues their participation in WP supported activities.

(2) Registration of UI claimants with the State’s employment service if required by State law;

RI UI claimants are required to register with the state’s employment service. In order to assist claimants in complying with this requirement, the state has set up an automated process by which claimants who do not already have an existing registration (account) with the state’s virtual One-Stop (EmployRI) are pre-registered thereby allowing them to login and complete only the portions of the registration information not previously provided on their UI claim. Claimants are advised via a letter included in their information packet after filing a claim of the instructions to access their EmployRI account.
(3) Administration of the work test for the State unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants;

Claimants selected for RESEA are required to participate in the program which includes administration of the work test and two eligibility assessment reviews by One-Stop staff as well as individual job matching assistance, job referrals as appropriate, and mandatory individualized reemployment services designed to assist claimants in utilizing the One-Stop system for job finding and placement. RESEA serves a significant portion of the UI claim load starting with UCX claimants and those deemed most likely to exhaust UI benefits based on profiling score.

Non-RESEA claimants who enter the One-Stop for services including referrals to TAA and WIOA, evaluation for training suitability and other staff-assisted services (i.e. job search assistance and career counseling) meet with staff who administer the work test and make referrals to UI adjudication as appropriate. Additionally, any claimant who interacts with One-Stop staff and discloses a potential work test compliance or other eligibility issue are referred to UI adjudication as appropriate.

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

The Wagner-Peyser Employment Service is located in each One-Stop Career Center and has been since the implementation of the Workforce Investment Act of 1998. One-Stop staff is knowledgeable of available training and education programs and resources and refers to appropriate services accordingly.

(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—

In the context of RI agriculture, the role of the RI Department of Labor and Training (DLT) is to provide workforce and labor exchange services to the agricultural community both agricultural employers and Migrant Seasonal Farm Workers (MSFW’s). DLT will continue to comply with the requirements 20 CFR Subpart B, Service to MSFWs to ensure that any identified MSFWs are offered the same range of employment and training services, benefits and protections.

These services would mirror those services that are provided to non-MSFWS and would include counseling, skills assessment, job search assistance (including resume writing assistance), and suitable Job training program referrals. Every effort will be made to achieve the Equity Ratio Indicators as well as the Minimum Service Level Indicators. RI will continue to increase and pursue activities statewide where there is a variety of agricultural activity taking place in the
attempt to identify previously unknown migrant workers in order to provide access and information regarding Job Service information and other Job Center services.

“A significant state is one that has” the highest number of Migrant Seasonal Farm Workers (MSFW) applicants that utilized services under the Wagner-Peyser act and the Workforce Investment Act (WIA) of 1998. The employment and Training Administration (ETA) designates annually the top twenty states with the highest MSFW activity based on data received from state and local offices.” http://doleta.gov/programs/who.msfw.cfm. RI is not a significant MSFW state, although we will continue to provide information and assistance to employers and workers regarding assistance and services available to them. RI will report any Labor Law violations such as wages, hours, working conditions, certifications, recruitment and hiring of migrant workers ensuring the right to free access to intercede on behalf of individuals to its Labor Standards Unit and/or Federal Wage & Hour Division. Technical assistance and other business services designed to support and grow business will be provided as well.

(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.

In 2012 most family run farms occupied 69,589 acres dedicated to farming in RI. However, in 2017 it decreased to 56,864 acres. The U.S. Department of Agriculture reports that from 2012 to 2017, the total number of farms in Rhode Island decreased from 1,243 to 1,043.

The market value of agricultural production declined -3 percent from 2012 and crop sales increased to 16 percent. There have been no changes from previous years’ crop activities and there are no known changes in the number of MSFWs involved in crop activity.

The number of farmers markets in RI continues to grow. There are now 55 farmers markets statewide and two operate year round, known as “winter farmers’ markets” where a wide variety of locally-grown and produced products are available. RI serves every school district certain foods grown here within our state. Schools have purchased local milk to grass fed beef to eggs and continue to expand the amount and variety of locally grown, healthy foods. There are over 200 culinary and hospitality businesses in RI that now buy from local farms. Fresh, local food produced by RI agriculture complements the state’s strength in not only tourism but culinary and healthcare as locally grown food is distributed directly and through RI’s Farm Fresh Market Mobile to hotel chains, restaurants, hospital cafeterias and workplaces. In terms of revenue generated RI’s top five agricultural products are greenhouse and nursery products, dairy products, corn, potatoes and apples. Greenhouse and nursery products such as sod, ornamental trees, shrubs and other products account for more than half of the state’s agricultural income. According to 2017 Census of Agriculture Rhode Island’s most important agricultural asset, by a wide margin, is its greenhouse and nursery industry, accounting for 47.5% of the total agricultural production value. Sweet corn, potatoes, and apples are also important crops for the "ocean state." Rural areas support small-scale farming, including grapes
for local wineries, turf grass and nursery stock. In terms of livestock, dairy products lead in Rhode Island. Other livestock products include cattle and calves, aquaculture (primarily clams and oysters), farm hogs, and farm chickens. Three decades ago, many government officials and people in Rhode Island considered agriculture a dying sector. In recent years, however, we have seen a significant agricultural upturn in Rhode Island. According to the RI’s Agricultural Five-Year Strategic Plan, farmers are recognized as good stewards of 11 percent of RI’s land base and will continue to follow best management practices to ensure both natural resource conservation and food safety.

RI-grown food is helping to improve the nutritional health of the state’s residents. Income eligible seniors are given Senior Farmers Market Tuition Program coupons that are redeemable at various farmers’ markets/stands or the mobile farmers market that visits senior meal sites. A similar farmer’s market coupon program exists for the Special Supplemental Nutrition Program for the Women, Infants and Children Program. Installing Electronic Benefit Transfer (EBT) machines to almost half of the RI’s farmers markets has enabled SNAP recipients to use EBT cards to purchase Community Supportive Agriculture (CSA). CSA is a prepaid subscription to a farm’s produce for the season. Some cities in RI participate in “bonus bucks”, a program offered by Farm Fresh RI and several additional partners.

Rhode Island continues to seek new ways to identify MSFWs including outreach and will collaborate with the Unemployment Insurance Division to identify additional MSFW not registering in EmployRI or not identified by outreach.

(2) An assessment of the agricultural activity in the State means:

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

The top five labor intensive crops in RI are, apples, greenhouse/nursery, dairy, aquaculture and sweet corn. The bulk of the farms are located in the Northern end of the state, with some on Aquidneck Island.

During PY2017, the major labor-intensive crop in RI was apples. In 2017 there were fifty-seven apple farms in RI. The month of heavy activity is July. The bulk of the farms are located in the Northern end of the state, with some on Aquidneck Island.

The “green” industry (i.e. nursery, horticulture and turf) remains vital and the largest contributor to the economy of agriculture in RI.
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.

In PY2018, three farms placed job orders in conjunction with requesting H2A VISA workers with DLT. There were 8 requests for H-2A VISA workers. There were no staff referrals that resulted in hires from the One-Stop Career Center, there were zero internet self-referrals made, and there were no hires from our One Stop Career Centers.

Total MSFW registrations in RI from PY2017 through the present indicate 37 Migrant Farm Workers and 17 Seasonal Farm Workers. NetWORKri One-Stop Career Center staff outreach to these individuals revealed much incorrect self-identification as Migrant Workers/Seasonal Workers during the registration processed in EmployRI, RI’s online Labor Exchange instrument. Correct classification of the registered participants would fall under Seasonal Farm Workers, not necessarily working with crops, rather retail functions at farm stands, and also numerous landscaping activities.

Regardless, information was given regarding netWORKri services and the MSFW Complaint System. Those that have accepted agricultural positions have been from Jamaica and speak primarily English-African Creole language known as Jamaican Patois. The approximate number of MSFW’s in the state during peak season is 6.

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

(A) Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.
(B) Providing technical assistance to outreach workers. Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the employment service complaint system, information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.
(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.
(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.  
(E) Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.

The DLT plans to conduct outreach activity to MSFWs throughout the State during the peak harvest season for the month of July offering information on our programs and services available PY16. The RI State Monitor Advocate conducted MSFW outreach activities to 14 farms in order to make sufficient amount of information available in the temporary farm worker community.

In PY18 DLT outreached went from 14 farms to 20 farms during the peak season for the month of July. DLT will continue to offer information on services and programs for MSFWs and business services to promote growth and retention. To support this effort, a Business Service Representative will continue to accompany the SMA on all outreach visits.

The RI DLT will continue to locate and to inform migrant and seasonal farm workers about the core, intensive training services available through the netWORKri One-Stop Career Centers. The State Monitor Advocate (SMA) is available to assist the netWORKri staff in the conduct of outreach activities.

RI has a collaborative atmosphere between state agencies, nonprofits and the farming community. Continued coordination is critical to maintain a flourishing agricultural region. We will continue to work cooperatively to improve existing employment and training programs to emphasize the quality of service and customer satisfaction. The NFJP is an integral part of the public workforce system. The NFJP also partners with community organizations and state agencies to counter the chronic unemployment and underemployment experienced by farmworkers who depend primarily on jobs in agricultural labor performed across the country.

Assessment of Available Resources

DLT has available 50% of an FTE (Full Time Equivalent) to provide outreach services to MSFWs. If continued outreach identifies the need to increase this percentage, DLT will allocate the necessary funds to meet the needs and demands identified.

The SMA will document and maintain a file of on-going and regular reviews of services provided to MSFWs by the netWORKri One Stop Career Centers. The SMA will ensure that the netWORKri One Stop Career Centers staff are trained in the requirements of the regulations in respect to services offered to MSFWs.

Outreach contacts are conducted by the SMA during the peak harvest season. As many MSFWs as possible will be made aware of the full range of services, benefits and protection provided under 20 CFR653, Subpart B. The majority of contacts with MSFWs will be conducted between the peak harvest season and during routine agricultural employer’s visitations.
For the quarter ending June 30, 2018 the RI DLT’s SMA met its goal from 14 to 20 days of outreach. For PY2017-2018, The SMA conducted 5 field visits to local H2A farms explaining the system to local H2A agricultural employers. Also, three field checks took place to inform MSFWs of netWORKri services. No violations or complaints were found. Field conditions were checked, a house inspection was conducted, and five H2A workers were interviewed. Joint outreach took place with an Outreach worker from NEFWC. Additionally, the SMA met with Community Based Organizations to explain services available and to promote cooperative working relations between the DLT and farm worker groups.

SMA in conjunction with the New England Farm Worker’s Council representative, located in the Providence netWORKri Career Center, will develop a schedule for the purpose of coordinating outreach efforts. Visits will continue to be made to address the noted increase of fruit farms to provide farm workers with information regarding employment and training services at the DLT One Stop Career Centers in addition to their legal rights pertaining to wage and hour. Sanitary working conditions in and outside of their living quarters and also the effects of heat exhaustion are always brought to the farm workers attention. Farm workers are also provided with information pertaining to supportive services that the NEFWC can assist with such as heating assistance and additional training programs. Printed netWORKri promotional material is distributed as appropriate.

Outreach will be accomplished through personal contact. The DLT and the One-Stop Career Centers will continue to establish new and existing relationships with local and statewide networking groups on how to better serve the MSFW population.

(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.

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

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

The DLT will ensure that the netWORKri staff members are trained in the requirements of the regulations in respect to services offered to MSFWs. In an effort to align and integrate workforce development services and to increase outreach to MSFWs, DLT and the New England
Farm Worker’s Council (NEFWC) have entered into a non-financial cooperative agreement. The NEFWC representative is located in the Providence netWORKri Career Center, the state’s largest comprehensive One-Stop Career Center. DLT in cooperation with the New England Farm Worker’s Council will work expeditiously to identify and assure maximum services to MSFWs. The SMA will ensure that all services and programs that are provided in the netWORKri Centers are available for MSFWs. The One-Stop Career Center system ensures the needs of migrant and seasonal farm workers are met through universal access and full integration of services either on-site or through electronic access. The employers most likely to utilize MSFWs or seasonal farm workers are the small fruits, vegetable and apple growers. These employers have a historical timeframe of when they need workers and are contacted when those times arrive.

Services are available statewide and MSFW customers have access to a broad range of employment, training, and educational services including Adult Basic Education and ESL as this is a prerequisite to occupational skills and training. Information is provided to Partners and front line staff at the One Stop Career Centers on how to identify a MSFW in an effort to correctly identify a MSFW and code an individual appropriately in order to be referred to the NJFP. Training continues to be provided to the netWORKri staff regarding services available to MSFWs through NEFWC and the netWORKri staff has provided NEFWC with information regarding all services and activities available in the One-Stop Centers. The Monitor Advocate is available to assist offices in outreach, aside from independent activities with farm workers.

DLT will continue to work with and expand if possible contacts with non-profit organizations that have a special focus on or generally serve farm workers. Bilingual staff is also available to effectively assist MSFW customers with the use of job order information and job opportunities. Assistance is provided in the use of the computer terminals, self-registration access to Unemployment Insurance and any training opportunities. Federal and State mandatory posters are visibly displayed in the lobby area of each local office for public viewing. All posters are in English and Spanish.

Information about the available services and how to access them is provided through outreach to MSFWs. The SMA and the Business Service Unit will continue to perform outreach and inform employers of the benefits provided by the DLT in an effort to recruit locally within the state and through interstate worker recruitments. The SMA will work with areas without network meetings which would be interested in establishing them and explore opportunities for strengthening partnerships in such activities. Staff assistance is available to all MSFWs for learning the EmployRI system. Based on the customer’s needs and desire an appropriate next step is determined such as self-service resource area, direct referral to partner program staff, orientations, one-on-one assistance, career counseling, Veteran’s employment and training services, resume writing, job search assistance, vocational testing, reemployment workshops and job referrals.

The integration of services is intended to increase the quality of services, focus on skills of both unemployed and current workers. This assessment is critical to ensure appropriate and seamless referrals to partner programs and services.
Computers in the resource areas are designed to provide a multitude of employment and reemployment resources in each One-Stop. Customers may use job boards, Internet access, printers, telephones and faxes to conduct a job search free of charge with or without staff assistance, however, resource specialists knowledgeable in technology and partnership services are available in the resource area to assist customers.

Customers interested in gaining new job skills or verifying their existing skills may access Alison online training. Also included are: various job banks, workforce information for job seekers and employers, cover letters, resumes, telephones and fax machines.

Comprehensive assessments, development of individual employment plans, individual and group counseling, workshops, testing and case management are examples of intensive services that could be provided.

In addition the One-Stop delivery system will address the needs of all farm workers, including those in need of Adult Basic Education and ESL as a prerequisite to occupational skills training in order to become gainfully employed and achieve upward mobility in the workforce. Services can be provided directly to customers either on site or through electronic access. Services are available statewide, at four strategically located One Stop centers. Each center offers interpretation services to individuals who require language assistance. All individuals will be able to access the core services.

In order to improve services and meet the minimum requirements, this agency will ensure that all One-Stop netWORKri staff has been properly trained in the proper identification and coding of MSFWs as well education on the multiple barriers of employment many MSFWs confront. The SMA will continue to conduct on-site monitoring of the netWORKri Centers to ensure compliance with federal requirements and to offer technical assistance to staff as needed. RIDLT is committed to achieving full compliance with the federally mandated minimum requirements for providing services to MSFWs during the coming year.

Services Provided to Agricultural Employers through the American Job Center Network

The SMA will work with farmers to continue to inform them of the DLT’s workforce services. Wagner Peyser Act funded Labor Exchange activities will continue to provide services in the netWORKri Career Centers throughout the State. NetWORKri Centers offer accessible employment services that effectively and efficiently meet the needs of all customers including employers. Staff in the NetWORKri Centers will continue to use a variety of tools to attempt to match the job seekers’ skills, interests and abilities with an initial upfront assessment and direction.
The SMA will continue to reinforce positive relationships with farm workers, farmers and other non-profit organizations while conducting outreach activities. During the next year RIDLT will continue to outreach to agricultural employers as a means of engaging local workers in the full range of services offered in the netWORKri Career Centers.

The State will continue to administer the H-2A program in an effort to respond quickly to labor needs. Work with the New England Farm Worker’s Council; continue to attempt to develop a relationship with farm and agricultural organizations to identify agricultural employers who may not have been previously contacted. The SMA will also research and identify linkages with the Hispanic community to be able to connect with potential Migrant seasonal farm workers if they are present in RI.

(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 RI DLT has partnered with the New England Farm Workers Council to provide increased services to identified MSFWs/SFWs and farm employers. A representative from the New England Farm Workers Council maintains a presence in the Providence NetWORKri One-Stop Career Center to work with staff to identify MSFWs/SFWs and to refer to New England Farm Workers Council as an additional resource to meet their needs. This representative will accompany the Business Workforce Center representatives and the SMA on outreach visits to farm businesses.

One Stop staff will provide all career and job services, including navigating the labor exchange system and refer businesses to the Business Workforce Center to participate in the Agricultural Recruiting System (ARS) and utilize the recruiting available in EmployRI. The labor exchange system provides job openings in both agricultural and non-agricultural employment. There have not been significant numbers of agricultural job opportunities in the past. However, with continued outreach and collaboration with other agricultural organizations, the numbers may increase.

Other services, such as training or supportive services, through the One-Stop Career Center and New England Farm Workers Council and WIOA funding will provide a pathway for MSFWs/SFWs to transition to high wage jobs and permanent year-round employment in both the agricultural and non-agricultural industries.
All complaints from MSFWs/SFWs regarding violations of employment related standards and laws shall be taken in writing by designated representatives in each One-Stop Career Center and referred to the SMA for timely resolution. The SMA will make referrals as appropriate and cooperate with the US Department of Labor Wage & Hour Division or other appropriate agencies involved in addressing and resolving complaints.

RI DLT SMA attended the MSFW Monitor Advocate National Training from July 11-13, 2107 in Albuquerque, New Mexico. This conference focused on Prevailing Wage and Practice Surveys, Overview of CNPC Process, SWA Roles and Responsibilities, MSFW Outreach and Field Checks. Also, the RI DLT SMA attended MSFW Monitor Advocate Training on June 26 -28 at the Sam Nunn Atlanta Federal Center in Atlanta GA. This training focused on SMA Responsibilities, Planning and Providing Services through MSFW Outreach, Agricultural Outreach Plan (AOP) and Foreign Labor Certifications.

In July of 2018, the SMA met with New England Farm Worker’s Council representatives located in the Providence NetWORKri Career Center and developed a schedule for the purpose of coordinating outreach efforts. A schedule of contacts and visits was made to provide farm workers with information regarding employment and training services, supportive services and distribute printed NetWORKri materials. Outreach is being accomplished through personal contact, DLT, and the One-Stop Career Centers.

(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.

(i) 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.
The plan was sent out to the New England Farm Worker’s Council on March 28, 2014 and accepted with no comment. Additionally, the plan was sent out to the following Agricultural Organizations on April 9, 2014:
1. RI Department of Environmental Management-Agricultural Division
2. RI Farm Bureau [http://rifb.org/](http://rifb.org/)
4. UDA Farm Service Agency

There were no comments. The plan was reviewed for modification to the State Integrated Plan at the Strategic Investment Committee of the Governor’s Workforce Board. The Governor’s Workforce Board’s Strategic Investment Committee approved the plan on June 3, 2014 and forwarded to the full Board for approval. The full Board approved the plan on June 19, 2014. Most of the demographic information was based on the RI Department of Environmental Management’s Division of Agriculture’s website.

(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.

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(D) Assessment of progress. The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

The state believes our goals were met.

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

The SMA has been afforded the opportunity to review and provide input into the Agricultural Outreach Plan. The SMA comments and recommendations have been incorporated into the Plan, and she will be kept informed of further plan development.
ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM

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)).

In 2010, the Rhode Island Board of Education adopted the Common Core State Standards (CCSS) for use in the state’s public K-12 system. In alignment with this decision, on January 13, 2014, the Board adopted the national College and Career Readiness Standards for Adult Education (CCRS) (a subset of the CCSS) to be used within Rhode Island’s adult education system, effective as of January 14, 2014. The adoption of the CCRS benefits Rhode Island in a number of ways, including the promotion of consistent expectations between the K-12 and adult education systems so all students - whatever their pathway to graduation - will have access to the preparation they need to enter credit-bearing postsecondary courses without the need for remediation.

New in the current adult education funding cycle, eligible providers were required to establish and maintain local professional learning communities (PLCs) to support the implementation and expansion of standards-based curriculum and instructional practices at the program level statewide. System wide, providers’ ongoing CCRS implementation efforts are supported through professional development activities provided by the state, building upon seven years of professional development institutes and trainings on research-based classroom practices. Program-level CCRS implementation will continue to be a priority in the new RFP planned for spring 2021.
B) Local Activities. Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

Adult Education and Literacy Activities (Section 203 of WIOA)
- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training that—
  1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
  2. Is for the purpose of educational and career advancement.

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

RIDE has funded a statewide network of 20 eligible local providers for adult education and literacy activities through a competitive Request for Proposal process held in the spring of 2018. The current grant period runs from July 1, 2018 until June 30, 2021. The office of adult education anticipates releasing an RFP for the next funding cycle in spring 2021. Additionally, RIDE requires local providers funded through the multiyear RFP to reapply for funding on an annual basis through an abbreviated application process.

Application processes for adult education funds are uniform to ensure a standardized approach to the review of proposals and awarding of funds. RFPs are broadly advertised on social media and distributed through social networks. All current providers and other potential applicants that request information prior to the announcement receive information on the same day as the social media notice. All eligible applicants go through the same application and review process and have direct and equitable access to apply and compete for title II grants and contracts, including WIOA Sections 225 (Corrections), 231 (Grants) and 243 (IEL/Civics).
As required by WIOA section 107 (d)(11)(B)(i), all of the Title II adult education grant proposals received in spring 2018 were reviewed by one of the state’s two local Workforce Development Boards to determine whether the title II applications are consistent with the proposed local plan for the local area. The local board then made recommendations to RIDE to promote alignment with the local plan. RIDE will follow this same process in reviewing proposals received in response to the RFP planned for spring 2021.

Direct and equitable access to applying for these grants is ensured, as the state requires that all grants and contracts are competed in the same manner, using the same processes and templates. Additionally, all pertinent information related to this and all grants and contracts is made available on the state Department of Education website and provided to those in direct contact with the state agency. A bidders’ conference and an online state agency portal allow opportunities to ask questions about the grant opportunity. The state agency believes that through these mechanisms, direct and equitable access is affected.

An “eligible provider” is one that has demonstrated effectiveness in providing adult education activities and may include: a local education agency, a community-based 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 services, a consortium or coalition of agencies, organizations, institutions, libraries, or authorities described above, and a partnership between an employer and an entity described above.

An applicant may “demonstrate effectiveness” by providing performance data on its record of improving the skills of eligible individuals, in meeting the state-adjusted levels of performance, particularly those individuals with low levels of literacy, in the content areas of reading, writing, math, and English language acquisition. An eligible provider must also provide information regarding its outcomes for participants related to employment, attainment of secondary school diplomas or equivalents, and transition to postsecondary education and training.

Eligible providers who were previously funded with RIDE funds must provide performance data from the state adult education Management Information System (MIS), including, but not limited to, NRS Table 4 and Table 5. An eligible provider who was not previously funded by RIDE must provide performance data to demonstrate past effectiveness in serving basic skills deficient eligible individuals, including evidence of its success in achieving the outcomes listed above (content area educational gains, employment, high school diplomas or equivalents, and transition to postsecondary education and training).
Eligible programs may provide some or all of the following allowable activities; programs may also provide these services concurrently:

- 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

English language acquisition activities have been a priority for the state, as more than half of all RI adult education students have been English language learners during the last five years. The remaining adult student population enrolled in either adult education or literacy activities and a small portion of students have been served in family literacy programs. Following state priorities to increase employment outcomes, RIDE encourages eligible providers to offer adult education, literacy, and English language acquisition activities concurrently with workforce preparation activities and integrated education and training activities.

The state’s flagship workforce development initiatives, “Real Jobs Rhode Island” and “Real Pathways Rhode Island,” establish partnerships responsive to employer and industry demand. Adult education and literacy providers partner with local businesses and industries on projects for both initiatives. These providers contextualize adult education, literacy and English language acquisition activities to meet the needs of industry partners. Examples of these partnerships in high-demand occupations in Rhode Island include hospitality, health care, construction, and aquaculture. Programs that offer concurrent activities of adult education, literacy, and English language acquisition with integrated education and training contextualize curriculum by integrating adult education content standards (CCRS), with relevant industry-specific occupational content, such as standards and credentials identified by employer and industry partners.

In awarding grants or contracts, RIDE considers the following, from Section 231(e):

1. The degree to which the provider would be responsive to regional needs as identified in the Local Plan and serving individuals in the community most in need of AEL activities, including individuals who have low levels of literacy skills or who are English language learners;
2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;
3. Past effectiveness of the provider in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance.
described in section 116, especially with respect to eligible individuals who have low levels of literacy;

4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108, as well as activities and 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 eligible provider’s activities, including whether reading, writing, speaking, mathematics and English language acquisition instruction delivered by the eligible provider are based on the best practices derived from the most rigorous research available and appropriate; including scientifically valid research and effective educational practice;

7. Whether the eligible provider’s activities effectively use technology, services, and delivery systems, including 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 eligible 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 eligible provider’s activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development opportunities, including through electronic means;

10. Whether the eligible provider’s activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways;

11. Whether the eligible provider’s activities offer flexible schedules and coordination with Federal, state, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

12. Whether the eligible provider maintains a high quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance;
13. Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

Each eligible provider desiring a grant or contract from RIDE submits an application to RIDE containing such information and assurances as RIDE may require, including:

A. A description of how funds awarded under this title will be spent consistent with the requirements of this title;
B. A description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;
C. A description of how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under title I, as appropriate;
D. A description of how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators;
E. A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;
F. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individuals; and
G. Any information that addresses the 13 considerations described under section 231(e), as applicable.

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

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.
Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

As part of the open and competitive RFP process held in spring 2018, funds made available under Section 222(a)(1) were awarded to the RI Department of Corrections (DOC). RIDE will hold another RPF process in spring 2021, since the current three-year funding cycle expires in June 2021.

Section 222(a)(1) funds are awarded for adult education and literacy activities, high school equivalency preparation (GLE 9-12) and career pathways to support students in their next steps, including their transition to re-entry. Additional services may include integrated education and training, peer tutoring, and transition to re-entry initiatives, and other post-release services with the goal of reducing recidivism. The Rhode Island Department of Education uses no more than 20 percent of the 82.5 percent of the state grant that must be allotted to local programs for activities under Section 225 to provide educational programs for incarcerated adults in correctional institutions and other institutionalized individuals. Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

The current provider of correctional educational services, the DOC, delivers transition services for up to 90 eligible inmates annually. Inmates are within five years of release per WIOA guidelines. The DOC’s approach to transition service delivery focuses on preparing inmates to address some of the most difficult obstacles many face in the re-entry process. Inmates are supported through enrollment, goal setting, and development of an individualized re-entry plan, and benefit from ongoing services prior to and following release. Additionally, the DOC, under contract with the state community college, provides postsecondary advising services onsite at the Adult Correctional Institution for students enrolling in courses leading to industry-recognized credentials and college transition courses.

The application process is uniform to ensure a standardized approach to the review and award process. Direct and equitable access to applying for these grants is ensured, as the state requires that all grants and contracts are competed in the same manner, using the same processes and templates. Additionally, all pertinent information related to this and all grants and contracts is and will be made available on the state Department of Education website and provided to those in direct contact with the state agency. A bidder’s conference and an online state agency portal allow opportunities to ask questions about the grant opportunity. The state agency believes that through these mechanisms, direct and equitable access is affected.
In awarding grants or contracts under Section 225, RIDE will consider the following, from Section 231(e):

1. The degree to which the provider would be responsive to regional needs as identified in the Local Plan and serving individuals in the community most in need of AEL activities, including individuals who have low levels of literacy skills or who are English language learners;
2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;
3. Past effectiveness of the provider in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in section 116, especially with respect to eligible individuals who have low levels of literacy;
4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108, as well as activities and 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 eligible provider’s activities, including whether reading, writing, speaking, mathematics and English language acquisition instruction delivered by the eligible provider are based on the best practices derived from the most rigorous research available and appropriate; including scientifically valid research and effective educational practice;
7. Whether the eligible provider’s activities effectively use technology, services, and delivery systems, including 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 eligible 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 eligible provider’s activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development opportunities, including through electronic means;
10. Whether the eligible provider’s activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational
institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways;

11. Whether the eligible provider’s activities offer flexible schedules and coordination with Federal, state, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

12. Whether the eligible provider maintains a high quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance;

13. Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

Each eligible provider desiring a grant or contract from RIDE shall submit an application to RIDE containing such information and assurances as RIDE may require, including:

A. A description of how funds awarded under this title will be spent consistent with the requirements of this title;

B. A description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;

C. A description of how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under title I, as appropriate;

D. A description of how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators;

E. A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;

F. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individuals; and

G. Any information that addresses the 13 considerations described under section 231(e), as applicable.
D) **Integrated English Literacy and Civics Education Program.** Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries, including how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities. Describe how the State will fund, in accordance with the requirements of title II, subtitle C, an Integrated English Literacy and Civics Education program and how the funds will be used for the program. Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency. Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.

The state’s application for section 243 IELCE funds was competed along with the application for section 225 and 231 funds as part of the RFP process held in spring 2018. The state awarded four grant awards to support IELCE programming during the three-year grant period from July 1, 2018 to June 30, 2021. RIDE will hold another competition in spring 2021.

Each program that receives funding under section 243 is 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 and integrate with the local workforce development system and its functions to carry out the activities of the program. The four providers currently funded for IELCE services deliver programming for English Language Learners in an array of sectors - including health care, education, hospitality, and construction. Technical skills development is supported by contextualized curriculum aligned with specific career pathways, designed with input from industry partners. Requirements for IELCE funding also include rigorous academic programming that is aligned to and embedded in work-based training opportunities and job-related experiences that align with given pathways and yield industry-related credentials.

IELCE programs are located in communities with significant concentrations of adult English language learners and operate in partnership with established programs and other community agencies. Programs receiving IELCE funds are required to deliver programs in combination with integrated education and training activities. Students receive IELCE instruction at the funded program, including literacy and English language acquisition integrated with civics education and instruction in the rights and responsibilities of citizenship and civic participation. Then, as appropriate, students are referred to well-aligned occupational skills training, which may be delivered at a partner agency. Upon completion of training, students are placed in unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.
All four of the current IELCE grantee providers integrate their programming with the local workforce development system. IELCE activities at three of them are partially funded by the state Workforce Development Board. The local one-stop center is also a key partner in this model as these centers are referral sources for potential employer partners.

The state’s application for section 243 IELCE funds requires eligible agencies to provide evidence of capacity for IELCE and a detailed plan for how English language acquisition and civics education will be delivered on a concurrent and contextualized basis. For example, agencies need to demonstrate the ability to work with partners to accomplish the purposes of IELCE in the funding competition, including evidence of established industry partnerships.

The 13 considerations, as specified in section 231(e) of WIOA are integrated into the narrative portion of the application. Eligible agencies must provide narrative detail on how they will meet the considerations, along with a supporting budget. Only those applications that include activities and budgets that meet the statutory requirements will be approved by the state agency.

The application process is uniform to ensure a standardized approach to the review and award process. Direct and equitable access to applying for these grants is ensured, as the state requires that all grants and contracts are competed in the same manner, using the same processes and templates. Additionally, all pertinent information related to this and all grants and contracts is and will be made available on the state Department of Education website and provided to those in direct contact with the state agency. A bidder’s conference and an online state agency portal allow opportunities to ask questions about the grant opportunity. The state agency believes that through these mechanisms, direct and equitable access is affected.

In awarding grants or contracts under Section 243, RIDE will consider the following, from Section 231(e):

1. The degree to which the provider would be responsive to regional needs as identified in the Local Plan and serving individuals in the community most in need of AEL activities, including individuals who have low levels of literacy skills or who are English language learners;
2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;
3. Past effectiveness of the provider in improving the literacy of eligible individuals, to meet State-adjusted levels of performance for the primary indicators of performance described in section 116, especially with respect to eligible individuals who have low levels of literacy;
4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108, as well as activities and 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 eligible provider’s activities, including whether reading, writing, speaking, mathematics and English language acquisition instruction delivered by the eligible provider are based on the best practices derived from the most rigorous research available and appropriate; including scientifically valid research and effective educational practice;

7. Whether the eligible provider’s activities effectively use technology, services, and delivery systems, including 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 eligible 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 eligible provider’s activities are delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development opportunities, including through electronic means;

10. Whether the eligible provider’s activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local workforce investment boards, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based organizations, nonprofit organizations, and intermediaries, for the development of career pathways;

11. Whether the eligible provider’s activities offer flexible schedules and coordination with Federal, state, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

12. Whether the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes (consistent with section 116) and to monitor program performance;
13. Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs.

Each eligible provider desiring a grant or contract from RIDE shall submit an application to RIDE containing such information and assurances as RIDE may require, including:

A. A description of how funds awarded under this title will be spent consistent with the requirements of this title;
B. A description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;
C. A description of how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under title I, as appropriate;
D. A description of how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators;
E. A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;
F. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individuals; and
G. Any information that addresses the 13 considerations described under section 231(e), as applicable.

E) State Leadership. Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA.

Funds made available under section 222(a)(2) for adult education and literacy activities will be used to develop or enhance Rhode Island’s adult education system. Not more than 12.5 percent of grant funds will be dedicated to State Leadership activities under section 223. Rhode Island Department of Education (RIDE) will use these funds to cover RIDE personnel costs and outside consultant salaries to carry out the following required State Leadership activities:

A. Align adult education activities with core and one-stop partners;

As part of the 2018-2021 RFP, eligible providers were required to describe how they collaborate with workforce development programs and how they align adult basic education programming with partners named in the unified state plan. Programs were required to detail how they would provide services that would promote concurrent enrollment with Title I and other WIOA core programs and activities in order to meet state performance targets, and how they would collect data to report on performance indicators. The RFP for the next funding cycle (to begin in 2021) will require eligible providers to address collaboration with core partners, alignment of activities, and data collection.
Apart from including these priorities in the funding application process, RIDE personnel encourage and assist providers in making connections with the core and one-stop partner programs. Local programs have continued enhancing and revising procedures and policies including intake, case management, and client referral and placement, to facilitate access to high-quality career services, education, and training supportive services for those with the greatest barriers to employment. Funded providers are required to report on their alignment with core and one-stop partners in their annual funding renewal applications. This data is used to help guide the state plan technical assistance and to support continuous quality improvement.

The state is committed to cross-agency alignment of investments and activities. Adult education staff members whose salaries are supported with State Leadership funds attend a monthly WIOA Interagency Workgroup, where core partners explore opportunities for further alignment of policies and practices across titles. This workgroup is chaired by a staff member of the Governor's Workforce Board (GWB - the state Workforce Development Board) and includes the adult education state director and staff, the executive directors of the Local Workforce Development Boards (LWDB), and representatives from the Department of Labor and Training (DLT), the Department of Human Services (DHS) (including TANF, the Office of Rehabilitation Services, and SNAP), and the Department of Behavioral Healthcare, Developmental Disabilities and Hospitals (BHDDH). Discussion includes alignment of intake processes, data sharing agreements, and other topics related to statewide WIOA implementation. Another Workgroup priority is establishment of a system wide Community of Practice. RIDE is committed to working with partner agencies, clients, providers, and other stakeholders to establish a Community of Practice and participating in system wide conversations to determine uniform statewide definitions and standards of quality around topics such as work readiness, essential/soft skills, career counseling, financial literacy, and more.

WIOA Interagency Workgroup discussion has resulted in the adoption of the Comprehensive Adult Student Assessment System (CASAS) as the state’s common assessment of literacy and numeracy across all core partners. RI’s adult education system is well positioned to transition to CASAS as the uniform state assessment. The majority of RIDE-funded providers already use CASAS exams to document Educational Functioning Level gains, and the state supports statewide CASAS training to ensure that administration certification training is available on a regular basis.
In addition to monthly participation in the WIOA Interagency Workgroup, RIDE convenes weekly interagency meetings including representatives from three core partners (Education, Labor, and Human Services, as well as the Governor’s Office) to coordinate public investments and access to services for Rhode Island’s adult learner population across agencies. This meeting focuses on adult education activities, with the goal of better aligning policies and practices in order to expand and strengthen the state’s adult education system.

There are two local workforce development areas within Rhode Island. Adult education providers cooperate with the one-stop centers in the areas of Providence, West Warwick, and Woonsocket, and will continue to seek out opportunities to deepen the collaboration. RIDE has fully executed Memorandums of Understanding with both workforce development boards. The MOUs define the roles and responsibilities of each partner as mutually agreed by the parties for the operation of the one-stops as required under WIOA. Title II funds are used to provide an adult education seat at the one-stop centers.

Each of the two local Workforce Development Boards includes a local adult education provider as a member. As board members, these providers participate in ongoing WIOA implementation at the local level. The work of the boards supports local program efforts to develop career pathways that provide access to employment and training services for adult learners; and promotes an understanding in the field of the value of Integrated Education and Training models designed in partnership with employers.

Additionally, RI core partner agencies work together to ensure regular stakeholder engagement. In coordination with RIDE, Department of Labor and Training hosts a quarterly meeting of its Education and Employment Advisory Committee. This committee serves as a forum to engage a broad cross-section of adult education stakeholders, including providers; employer partners; community-based organizations; and representatives from the core partner agencies. Furthermore, adult education staff members supported with State Leadership funds also attend monthly meetings of the Rhode Island Workforce Alliance. This community coalition focuses on issues affecting low-income working Rhode Islanders, and includes participation from adult education program directors, as well as constituents from outside the field. Members have been a consistent source of feedback on state WIOA implementation activities, including the development of local plans, and the choice of an operator for the One-Stop offices. RIDE is committed to working with each local workforce development area to ensure ongoing community engagement and continuing to align and coordinate with partner programs on recruitment, awareness, and engagement efforts.
B. Establish or operate high quality professional development programs to improve instruction, including instruction incorporating the essential components of reading instruction as such components relate to adults; instruction related to the specific needs of adult learners, instruction provided by volunteers, and dissemination of information about models and promising practices related to such programs.

The state has invested in a two-part strategy to establish and operate high quality professional development programming, balancing statewide coordination with local control. In consultation with RIDE - and based on provider feedback - the Director of Adult Education Professional Development will develop an annual calendar of professional development activities for the state. State level professional development will be designed to support provider quality with a focus on evidence-based practices in: reading, writing, speaking, mathematics, English language acquisition, and Integrated Education and Training (including I-BEST), as well as assessment administration, serving students with disabilities, and orientations specifically for adult education practitioners new to the field or the state. In addition to supporting the development of local professional development offerings, statewide professional development provides in-depth training opportunities from national and regional providers. At the local level, RIDE has prioritized supporting programs in determining the scope and focus of professional development for their own staff and building local professional learning communities. All local providers are required to designate a staff person as the Professional Learning Specialist who serves as a link between efforts at the program and system level. The Specialist assesses and communicates the professional development needs for their local program, highlights local efforts at the system level, and ensures that state professional development opportunities are, in turn, promoted at the local level.

Professional development activities funded by State Leadership will support the continued implementation of standards-based curriculum, building upon seven years of professional development institutes and trainings on research-based practices (TEAL Writing, ANI, Standards In Action, and three cohorts of STAR). A strong foundation has been laid for this work in the state, with workshops focused on Understanding by Design, Proficiency Based Teaching and Learning, and Quality Assessments. Content was delivered in tandem with activities that fostered a local community of practice, encouraging cohort communication virtually throughout, and participation in coaching onsite to support practitioners in addressing challenges to implementing change in the classroom and at the program level.

The state also recognizes the critical need for adult learners to be equipped with digital literacy skills. One of the RIDE-funded adult education providers is designated to serve as the resource for technology-related professional development and technical assistance for the field statewide. This is a key state initiative that ensures the integration of digital literacy and skill building throughout adult education activities and coordination across state agencies wherever possible.
Rhode Island’s adult education system has a new website (RIAdultEd.org) that includes professional development resources for practitioners. Resources available on the site will be further developed in alignment with WIOA required activities, including tutor and volunteer-specific resources and state and national work readiness and career pathways resources. The website and content-specific Google Groups facilitate peer sharing and communication across programs and dissemination of information about promising practices and research-based models.

C. Provide technical assistance to adult education providers including:

1. The development and dissemination of instructional and programmatic practices based on the most rigorous or scientifically valid research available and appropriate, in reading, writing, speaking, mathematics, English language acquisition programs (ESOL), distance education, and staff training;

RIDE prioritizes the curation and dissemination of research-based instructional and programmatic practices from around the country to support the development of high quality adult education and literacy services locally. The state will continue to build upon well-established local initiatives related to standards-based curriculum implementation - including evidence-based approaches to instruction of reading, writing, math and numeracy - and technology integration and digital equity. Technical assistance on these topics has supported strong outcomes statewide through the sharing of promising practices and research, delivered in face-to-face sessions, as well as online.

State Leadership funds support quarterly adult education Leadership Institutes, which convene program managers from each RIDE-funded adult education agency. Facilitated by RIDE adult education staff, participation in the convenings is mandatory for RIDE adult education grantees. Leadership Institute agendas regularly include WIOA presentations to review statutory requirements and provide technical assistance related to the implementation of required activities. Updates and new guidance from OCTAE are also shared during the quarterly meetings. Agendas feature panel discussions and presentations by local programs highlighting promising practices related to WIOA implementation, including career pathways activities, contextualized education, integration of occupational skills training, and more.

The designation of a single adult education provider as the statewide resource for technology-related professional development and technical assistance has been integral to advancing adult education practitioners’ technology skills for instructional purposes. Building on several years of investing in programs’ basic technology infrastructure and technology skill development of staff, the state is committed to supporting programs in the use of technology to increase the amount, quality and effectiveness of learning. This will include investments in professional development for teachers and other key program staff and continued growth of the RIAdultEd.org Google domain. The goal of the professional development - focused on best
practices in instructional technology and skill development for various tech tools - is to ensure that adult learners are prepared for education and employment in the 21st century. The Google domain continues to provide the field with a shared online space between and within programs, and a platform for repositories of best practices and content for sharing among staff statewide. The technology PD provider also serves as a central point for longer term planning around emerging technologies, strategic partnerships and opportunities to use technology to increase efficiencies and learning opportunities.

Additionally, professional development will focus on having program staff increase their use of technology to offer blended models, thereby increasing instructional time for students through distance learning opportunities and providing increased access to material covered in the face-to-face classroom. Two promising practices related to both distance education and staff training are learning circles and mobile learning. Learning circles are a blended learning model incorporating individualized, tech-based learning with lower intensity facilitated face-to-face meetings. The technology PD provider uses the learning circle approach to deliver practitioner technology trainings, and some programs have made use of learning circles as a means to deliver services to students on waiting lists for space in a traditional classroom, as well as student-led learning circles to encourage leadership and extend learning. Future growth and development of mobile and distance learning models show great potential to expand access to educational opportunities for adult learners.

2. The role of adult education providers as one-stop partners to provide access to employment, education, training, and postsecondary guidance services;

RIDE adult education staff will work with the state’s one-stop partners to ensure that local providers are aware of their responsibilities to provide access to employment, education, and training services that are aligned with other services available in the local area. Avoiding duplication of services is a priority in order to ensure a more efficient service delivery. The office will work with both state workforce development boards and the one-stop system to determine training needed across partner organizations. RIDE will host statewide technical assistance workshops for adult education providers to enhance and align partnerships in the delivery of services. The state’s one-stop operator has been successful in supporting referrals between adult education providers, one-stop centers, core partners, and community-based organizations to increase access to employment opportunities for adult learners.

RIDE has collaborated with a local adult education provider to ensure a regular adult education presence onsite in two of the state’s one-stop centers. This provider’s instructors staff classrooms within the one-stops to serve clients looking for help with improving basic academic skills, GED, English for speakers of other languages, and digital literacy skills. Services are available in traditional classroom format, as well as through one-on-one tutoring supported by technology. The tutoring provides adults with just-in-time technology enabled services with
support from adult education staff. The state will continue this successful partnership, with many one-stop clients making skills gains that allow them to meet the minimum scores required to be eligible for additional training through the one-stop system and gaining the digital literacy skills to apply for jobs, access the state’s EmployRI system (the online face of the one-stop centers) and build the technology skills that employers require.

3. Assistance in the use of technology, including for staff training, to adult education providers, especially the use of technology to improve system efficiencies;

Thanks to the receipt of Incentive Funds under the Workforce Investment Act, the state benefits from robust technology infrastructure at the system- and program level. The adult education technology PD provider delivers professional development responsive to the needs of local programs, and cultivates communities of practice to support digital skills development among staff and technology integration into instruction. Incentive funds also enabled the state to invest in devices for classroom use statewide. Local providers understand that integrating technology into instruction and leveraging it to improve efficiency and learner outcomes is a priority for the state. Perhaps most importantly, each provider’s Professional Learning Specialist plays a key role in assessing technology-related professional development needs for their organization and relaying information between their program, the technology PD provider and RIDE.

RI will build on this foundation by continuing to ensure that providers have access to customized, evidence-based professional development activities to support the adoption of technology for instructional practices and to foster digital skills development among program staff. In partnership with the technology PD provider, RIDE will update state policies related to blended and distance learning, support the continued growth of the RI Adult Ed domain (which facilitates the sharing of resources for professional development and classroom use), and promote the use of Google Groups and other communication tools to improve system efficiencies. The state will implement a micro-credentialing system for adult education that will document practitioner and learner technology competencies, aligned with pathways to industry-recognized credentials.

State Leadership funds support a RIDE staff member who assists with technology integration initiatives for local providers. Providers are required to integrate digital literacy assessment and training for all learners - as it is a critical employability and life skill - and all local staff are required to demonstrate and document their digital proficiency.

RIDE adult education staff also facilitate regular technical assistance and MIS Users Group meetings for program leadership and staff. Meeting topics include quality data collection standards, NRS data reporting, and data analysis to support program- and class-level progress towards meeting statewide federal targets.
4. Monitor and evaluate the quality of and the improvement of adult education activities and disseminate information about models and proven or promising practices;

RIDE State Leadership funds will be used to support state staff who will continue to monitor and evaluate programs quarterly through a desk audit by analyzing data from the state’s adult education Management Information System (MIS). The data analyzed includes program enrollment, learner demographics, attendance hours, posttest rates, educational functioning level gains, measurable skill gains, employment outcomes, high school credentials, and transitions to postsecondary education or training. Programs whose outcome performance is not on track to achieve at least 80 percent of the state’s federally negotiated targets are flagged for site visits by state staff. Based on findings and recommendations from the site visits, the state office – in collaboration with the local program’s leadership – designs a corrective action plan to support program improvement. (Please see next section for details on monitoring). Resources to support program quality and improvement are identified through curation and dissemination of proven models – primarily through the annual professional development calendar, which includes trainings on standards-based instruction, contextualized curriculum, administration of standardized assessments, professional learning communities, and instructional technologies, delivered in multiple modalities: through group trainings, online, and through individualized coaching.

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

RIDE has multiple established initiatives that these funds may support, including cultivating increased adoption of instructional technology, identifying and disseminating curriculum frameworks aligned with the College and Career Readiness standards, developing content and models for integrated education and training (such as I-BEST), improving teacher quality through professional development, developing services to meet the needs of specific adult learner populations (such as adults with learning disabilities or English language learners).

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

RIDE evaluates programs through regular data analysis and quarterly desk audits by collecting data from its web-based MIS. The data analyzed includes program enrollment, learner demographics, attendance hours, posttest rates, educational functioning level gains, measurable skill gains, employment outcomes, high school credentials, and transitions to postsecondary education or training. RIDE has a data sharing memorandum of agreement with the RI Department of Labor and Training for employment outcomes. RIDE also conducts data matching with the National Student Clearinghouse database for the postsecondary education outcome and with the GED Testing Services database for GED attainment. The RIDE finance
office provides the adult education office with a financial analysis of the amount and percentage of funds expended.

The adult education MIS provides the full array of National Reporting System (NRS) tables for adult education as well as several customized reports that both the state office as well as local program providers can run to check performance at the state level, program level, teacher level, and student level. These reports can be used to identify areas of both strengths and weaknesses. The state office uses an Educational Functioning Level (EFL) Performance Review spreadsheet as a program-level report card that captures the real time EFL data from local providers in relation to the federally negotiated EFL targets. This spreadsheet allows the state office to determine how programs are doing at any moment in meeting and exceeding the state’s negotiated core indicator of EFL performance. Results for educational gains and follow-up outcome measures are calculated and then weighted by the number of students in each level, or cohort group, and converted into a final percentage expressing the provider’s ability in meeting or exceeding the core indicator targets.

The state has established a minimum threshold that each provider will achieve 80% of the state adjusted performance levels annually. Each providers’ EFL performance is reviewed biannually: at mid-year and at the end of each year. Programs at risk of not meeting the minimum threshold receive technical assistance from the state office to ensure quality improvement. The lowest performing programs are targeted for two-day on-site program reviews, which include a review for compliance with federal and state laws and policies, classroom observations, interviews with program staff and students, and a full financial review. Following the site visit, the programs receive a report from the state office that indicates findings, recommendations, and commendations. In collaboration with state staff, programs that receive findings are required to develop a Corrective Action Plan to detail course corrections. The Corrective Action Plan is tracked by the state office on a regular basis until all findings are addressed and corrected, the quality of the program improves, and the Corrective Action Plan is closed.

To support program directors and foster a data-informed culture of continuous improvement at the program level, the state provides professional development opportunities on program quality improvement and data analysis. Quarterly Leadership Institutes (statewide convenings of program managers) and monthly MIS Users Group meetings are both facilitated by the state office.

To support RI’s multi-year trend of improvement in overall program effectiveness, Rhode Island will continue to conduct regular data analysis, quarterly desk audits, and annual performance reviews of local program performance, as well as targeted on-site monitoring focusing on compliance issues for high-risk programs identified through desk audits.
VOCATIONAL REHABILITATION

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

A. Input of State Rehabilitation Council

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

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

The Office of Rehabilitation Services held their State Plan Public Hearing on November 14, 2019. The following comments were received from the State Rehabilitation Council on December 13, 2019: On behalf of the State Rehabilitation Council, we appreciate this opportunity to provide the following comments and recommendations regarding rehabilitation services (VR) portion of the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan for 2020 select Office of Rehabilitation Services (ORS). The SRC’s comments related to the Combined State Plan is the culmination of input from a variety of constituencies including acknowledgment of the comments from the Disability Rights of Rhode Island, Rhode Island Department of Education, and individual members of the State rehabilitation Council. Comments are provided related to areas needing clarification or that reflects suggested changes to the language of the State Plan. Sections of the plan that did not warrant comment are not addressed in this letter.

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

ORS Response to Council’s Input on State Plan Update: ORS wants to thank the Rhode Island State Rehabilitation Council for having members attend the State Plan Public Hearing on November 14, 2019, for reviewing the Vocational Rehabilitation Services portion of the WIOA Combined State Plan Update. ORS responses to those comments are listed below in the ORS response.

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

Explanations, if applicable, are listed in ORS response section.
B. Request for Waiver of Statewideness
When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. a local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;  
   N/A
2. the designated State unit will approve each proposed service before it is put into effect; and  
   N/A
3. requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.  
   N/A

c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System.
Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

1. Federal, State, and local agencies and programs;
The Rhode Island Office of Rehabilitation Services (ORS) collaborates with programs and agencies providing services that will assist an individual with a disability to establish and reach an employment goal. Types of agencies that ORS collaborates with include: hospitals, medical and disability support organizations, educational institutions (both public and private), professional associations, domestic violence and homeless shelters, community centers, community mental health agencies, local educational authorities, substance abuse treatment facilities, private medical offices, state agencies, federal agencies, community employers, private businesses, and advocacy groups. Memorandums of Understanding (MOU)/Cooperative Agreements (CA) have been negotiated with Department of Veterans Affairs (VA), Institutions of Higher Education (IHE - Rhode Island College, University of Rhode Island and Community College of Rhode Island), Rhode Island Department of Labor and Training (DLT), Mashantucket Pequot Tribal Nation, Workforce Partnership of Greater Rhode Island, Cranston/Providence Workforce Development, and the Rhode Island Department of Health (DOH). The MOU/CA between ORS and the Rhode Island Department of Education (RIDE) expired in September 2015, but both agencies had agreed to an extension of the CA which remains in effect. An updated MOU has been completed and signed, and copies were disseminated to both agencies in November 2019. During the recent site visit by the Rehabilitation Services Administration, there was advisory to ensure that the new MOU be revised to meet the federal standards, and RIDE and ORS have agreed to amend the new MOU to reflect those advisories. In order to enhance the recruitment of qualified rehabilitation counselors, ORS has a Memorandum of
Understanding with Assumption College and Salve Regina University to provide practicum and internship opportunities to graduate level Rehabilitation Counseling students. ORS has cultivated a strong working relationship with the State’s independent living center to augment the services provided by ORS.

RI has one IL center that provides support services, mobility and transportation training, advocacy services, home assessments, independent living skills/assistive technology assessment, and information and referral services to adults, out-of-school and in-school youth.

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

The SRC respectfully requests that the list of Memorandums of Understanding with various state, local agencies and educational institutions appear on the ORS website and are accessible to the general public for review.

The SRC is pleased that the Memorandum of Understanding (MOU)/Cooperative Agreement (CA) between ORS and the Rhode Island Department of Education has been signed and delivered to ORS after some delay.

The SRC notes that we are concerned regarding the recent mergers of the educational collaboratives and its potential impact for some collaboratives to continue as a strategic partner in the ATAP program. The SRC recommends that the State Plan address how it will ensure that the educational collaboratives can continue to provide services in a timely and effective manner.

2. The Designated State unit’s response to the Council’s input and recommendations; and The designated State unit’s explanations for rejecting any of the Council’s input or recommendations.

ORS would like to thank the SRC for this suggestion and will update the ORS website to include all current MOUs, Cooperative Agreements, etc., and ensure that documents are accessible to the public. ORS would like to thank the SRC for the commentary and suggestion. ORS will review the State Plan and update as needed. ORS is working directly with all the educational collaboratives and RI Department of Education (RIDE) to ensure that the provision of Pre-Employment Transition Services (Pre-ETS) is readily available to students with disabilities. ORS had recently piloted the scope of Pre-ETS services to middle school students with disabilities in ten districts this past school year; the pilot was expanded State-wide this school year. ORS will continue to monitor and report on this population, and continue the collaborative efforts with
RIDE, Regional Transition Coordinators (RTCs) and educational collaboratives to provide quality transition services to students with disabilities.

2. State programs carried out under section 4 of the Assistive Technology Act of 1998;
ORS continues to be the lead and implementing agency for the State Grants for Assistive Technology. In this role, ORS has facilitated a program called the Assistive Technology Access Partnership (ATAP). This partnership relies on contractual relationships with Ocean State Center for Independent Living (OSCIL), TechACCESS of RI, and East Bay Educational Collaborative to provide performance-measured services including device loans, demonstrations, device re-utilization, public awareness, and information and assistance.
ORS also operates a state-funded program called the Adaptive Telephone Equipment Loan (ATEL) program, that is included in the ATAP partnership. Based on ATAP’s strong collaboration, ORS utilizes ATAP services for ORS clients who need access to the above services for resources, vocational assessments, and job retention, as well as making sure an individual is able to utilize technology recommended to them to increase their vocational and independent living potential.
ATAP, in conjunction with the ATAP Partners and State Independent Living Center (OSCIL), provides training to ORS Vocational Rehabilitation Counselors about assistive technology and the services of the program. The ATAP Partners also participate in the Assistive Technology Conference of New England, which is held each Fall.

3. Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture;
ORS does not have such cooperative agreements at this time.

4. Noneducational agencies serving out-of-school youth; and
ORS has cultivated a strong working relationship with the one RI independent living center Ocean State Center for Independent Living (OSCIL) to augment vocational rehabilitation services. OSCIL center has the ability to provide support services, mobility and transportation training, advocacy services, home assessments, independent living skills/assistive technology assessment, and information and referral services. The IL center is exploring how to expand services to transition-aged populations: out-of-school and in-school youth. ORS also participates with the DLT Youth Centers in reviewing their requests for proposals for Youth Center Summer Work programs. In addition, the Office of Rehabilitation Services and one of the Youth Centers, has a project of jointly working with the youth in the South County area. Both Workforce Investment Boards of RI also have youth subcommittees of which ORS is a participant though the subcommittees have not met this year. ORS has begun expansion with the two Governor’s Workforce Boards and Real Jobs RI to expand Pre-Employment Transition services to students with disabilities. This has also initiated work with the Westerly Education Center on employment-specific job exploration programming that should lead to skilled job opportunities.
1. Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council’s report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council’s functions;

The SRC is encouraged by and supports the increase in collaboration with the two state Workforce Boards and Real Jobs R.I. We respectfully request that we are regularly updated regarding the expansion as it occurs and its impact on services to out-of-school youth. Going forward, the SRC requests that specific numbers regarding the goals and results of these efforts be shared with the SRC and would be beneficial information for the general public and programs invested in the project to know. In addition, the SRC encourages ORS to revitalize the youth subcommittees to increase its understanding of the needs of youth transitioning to work. It is our understanding that these subcommittees have not met in some time. The SRC also encourages ORS to further develop active partnerships with the Workforce Boards and Real Jobs R.I.

2. The Designated State unit’s response to the Council’s input and recommendations; and The designated State unit’s explanations for rejecting any of the Council’s input or recommendations.

ORS would like to thank the SRC for the commentary and suggestion. ORS recently found out that the two State Workforce Boards were going to be merged, but the final details are still under development. The SRC will be afforded an opportunity to review whatever final plan is created by the GWBs, which will likely necessitate an updated partner MOU. From this, ORS will review the State Plan and update for next State Plan cycle. ORS is working directly with all WIOA State Partners to ensure that service provision is readily available to all individuals with disabilities. The ORS Assistant Administrator Transition and Administrator met with the GWB youth subcommittee chair, but with the upcoming redesign/merger of the state and local workforce boards, re-vitalizing the subcommittee may need to take place after the final GWB plan is developed. ORS will continue to work with DLT, GWB and other WIOA State partners while this process is under way.

5. State use contracting programs.
The Vocational Rehabilitation program relies primarily on a fee-for-service model to purchase/obtain goods and services for clients. Goods and services are authorized according to the client’s Individualized Plan for Employment (IPE).

Vendors authorized to provide services are approved by ORS via an application process and review by RI Accounts and Control, plus a federal Systems for Award Management (SAM), and Secretary of State check at application, and are reviewed annually thereafter.

For two years RI has not utilized contracts for service provision, and those that had been established to assist educational collaboratives to move from long-term contracts with ORS to build their capacity to provide more comprehensive services such as assessment, community-based work experiences, and summer work to youth ended in 2016. The educational
collaboratives are now reliant on a fee-for-service model, as are all other ORS Community Rehabilitation Programs (CRPs).

In addition, ORS is the lead and implementing agency for the Assistive Technology Access Partnership (ATAP) program. The program is structured into contracts with deliverables, such as information and assistance, public awareness, device loans, device demonstrations, and device reutilizations. In November 2017, the VR program finalized a contract with the Sherlock Center of Rhode Island College to build Rhode Island’s capacity of Certified Benefits Counselors for individuals receiving SSI and/or SSDI. The Sherlock Center was granted the Work Incentive Planning and Assistance Grant by SSA to administer the WIPA program. Any work with the Sherlock Center is now through a fee-for-service arrangement.

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

The SRC is aware that ORS and the State of Rhode Island has moved from contracts to a fee-for-service model with the educational collaboratives, all other ORS Community Rehabilitation Programs (CRPs), and other vendors. As these changes are implemented, the SRC respectfully requests information on the following factors: a) the impact of this change on the participation rate of agencies serving people with disabilities in Rhode Island; and b) the impact on the delivery, availability and geographic accessibility of the services for Rhode Islanders with disabilities; this information is especially important in relationship to the educational collaboratives

We respectfully request regular updated data on the outcomes of their work with the ATAPs, and the performance measures outcomes from the Sherlock Center regarding the following information: 1) the number of people receiving benefits counseling; 2) outcome data related to clients’ choice to work after benefits counseling services have been provided.

2. **The Designated State unit’s response to the Council’s input and recommendations; and the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.**

ORS would like to thank the SRC for the commentary and suggestion. ORS has not been able to obtain much data in this area due to our Waitlist but will put together data and report back to the SRC at large about any impact the changes may have had with CRPs, Educational Collaboratives, and other vendors. ORS is exploring other initiatives with other State agencies (Let’s Get to Work, for example) to help in this area. ORS would like to thank the SRC for the commentary and suggestion. ORS can request this information of ATAP and the Sherlock Center and report back to the SRC at large about these items as appropriate. However, ORS has not had performance measures with the Sherlock Center, and is unsure if the outcome data related in number two above has been collected by the WIPA program.
(d) Coordination with Education Officials

Describe:

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

ORS has several formal agreements with Education Officials: (1) RI Department of Education (RIDE), and (2) RI Institutions of Higher Education.

I. COOPERATIVE AGREEMENT WITH RHODE ISLAND DEPARTMENT OF EDUCATION (RIDE)

A Cooperative Agreement (CA) with the RI Department of Education (RIDE) enables ORS to provide consultation and technical assistance to high school personnel and to provide transition services to in-school youth. An updated MOU has been completed and signed, and copies were disseminated to both agencies in November 2019. During the recent site visit by the Rehabilitation Services Administration, there was advisory to ensure that the new MOU be revised to meet the federal standards, and RIDE and ORS have agreed to amend the new MOU to reflect those advisories.

The plans and procedures for coordination with RIDE and ORS, an RSA Best Practice, has been the foundation of a collaborative relationship focused on school-to-work transition for almost twenty years. The formal agreement between ORS and RIDE describes interagency collaboration and coordination, explains the roles and responsibilities of each partner, and the process for resolving disagreements. In addition, a Collaborative Services Chart (CSC) identifies the agency primarily responsible for services in each of the following categories: Assessment Services, Career Development Services, Community Living Services, Related Services and Auxiliary Services. This collaboration has enabled ORS to have a MA level Rehabilitation Counselor at each high school to provide an array of services. ORS, through this partnership with RIDE, is well equipped to continue to provide an array of transition services and consultation in addition to WIOA Pre-Employment Transition Services (Pre-ETS.)

Two Memorandum of Understanding (MOU) are in place for RIDE, ORS, and the state Developmental Disability agency - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH). One MOU defines the working relationship between the three parties, and the other MOU addresses data sharing for the state agencies. The Department of Justice (DOJ)/State Consent Decree required that each of these MOUs be developed and implemented to ensure that the responsibility for services and implementation of Employment First principles occurs within RI in a manner consistent with the mandates of the DOJ/State Consent Decree. In-school youth with significant intellectual disabilities are entitled to access to an array of transition planning, career exploration/discovery services, and community-based work experiences prior to graduation from high school. The MOU describes the relationship between the parties and data collection to demonstrate that deliverables of the DOJ/State Consent Decree are occurring as prescribed.
The CA between ORS and RIDE provides the foundation for ORS Vocational Rehabilitation Counselors’ presence within each public high school in the state.

The referral to ORS from the Local Education Authority (LEA), with parental/guardian consent, is the first step in the referral process. The ORS Vocational Rehabilitation Counselor then conducts an intake meeting with the youth and family to explain services, the eligibility determination process, and the purpose of the program. This initial meeting creates the foundation for ORS Transition and Pre-ETS and includes the process for informed choice for student/family to register just for Pre-ETS services or apply for the full array of VR services. Under the auspices of the Cooperative Agreement, ORS is able to assist in-school youth with disabilities in collaboration with each LEA. These transition services and Pre-Employment Services fall under the regulations outlined in the 2014 Workforce Investment Opportunities Act (WIOA) to prepare students for employment after high school. However, due to State fiscal concerns and budgetary matters, ORS has had to implement a more restrictive OOS, as of 12/19/2017; and as a result, a Wait List for services has been implemented. This has impacted Pre-ETS service delivery. Counselors meet with potentially eligible students with disabilities and their parents/guardians to give them informed choice options as described above. Still, the Office of Rehabilitation Services strives and is committed to assist all students with significant disabilities to gain the necessary skills, preparation, exploration, and supports to enter the workforce. Inherent in the ORS Transition and Pre-ETS Program is an expectation that all students who are found eligible Category I for services will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility (Status 10) after coming off the Wait List, and updated as appropriate, and again prior to graduation.

The IPE establishes an employment goal and the associated steps/services needed to reach that goal. The IPE goal for in-school youth is considered exploratory, as it will probably change with increased exposure to career information and work experiences. The ORS Transition and Pre-ETS provided to in-school youth may include Counseling and Guidance, Vocational Evaluations/Exploration and Assessments, Community-Based Work Experiences, Tri-Employment Program, Transition Academy participation, Summer Work, Project Search, ORS/LEA Community Employment Projects, and travel training. Other Pre-ETS services are being explored, including job exploration services to middle-school aged students with disabilities that began as a pilot with 10 LEAs with hopes to expand State-wide in 2019-2020.

The DOJ/State Consent Decree has additional expectations of ORS services for in-school youth with significant intellectual disabilities (I/DD). DOJ expects all students with I/DD to have an opportunity to experience 120 days of trial work experiences prior to exit from public education. Therefore, ORS services incorporate a review of the Career Development Plan (CDP) with the Transition team of any community/work experiences that have already occurred. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities may include ORS-supported services. This information will assist the Transition team to achieve the two 60-day Trial Work Experiences mandate of the DOJ/State Consent Decree.
The student and his/her family’s involvement with ORS will support the student’s transition from high school to adult services/employment. The relationship established between the student, family, and Vocational Rehabilitation Counselor is already in place upon graduation.

II. COOPERATIVE AGREEMENT (CA) WITH INSTITUTIONS OF HIGHER EDUCATION

In support of ORS customers attending state colleges, ORS has a Cooperative Agreement (CA) with the three state institutions of higher education: Community College of Rhode Island (CCRI), Rhode Island College (RIC), and the University of Rhode Island (URI). The MOU clarifies the role of each partner in fostering a seamless delivery system intended to support ORS customers attending post-secondary programs. It also defines the financial parameters for each partner in a cost-sharing formula for support services, accommodations, and assistive technology for post-secondary students with an active Individualized Plan for Employment (IPE) with ORS.

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

The SRC supports the Disability Rights of Rhode Island’s (DRRI) request that information regarding CAP services be included in the initial meeting with clients, and especially during Pre-ETS meetings with clients and families. Additionally, the SRC supports the DRRI’s recommendation that the passion passage of Rhode Island’s Supported Decision-Making (SDM) law be passed and that principles of (SDM) be utilized in all intake and transition meetings. The SRC encourages ORS to partner with the Governor’s Commission on Disabilities to enlist their support for the passage of this Act. The SRC would like to acknowledge the expansion of Pre-ETS services to the middle school population as described in the Plan. This initiative speaks to the transition mandate and the spirit of the importance and emphasis of early intervention and transition services and goals.

2. The Designated State unit’s response to the Council’s input and recommendations; and the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.

ORS would like to thank the SRC for the commentary and suggestion. ORS is looking to include CAP information to the Pre-ETS information packets provided to students with disabilities, and already does provide that information to anyone (student or adult) who applies for ORS services. DRRI will be asked to provide ORS with the updated materials reflecting their new name, address, contact information, and fact sheets so that our materials are current. In January, DRRI will be presenting information about the SDM -- now that it has been passed into law -- to the ORS transition counseling staff and an overview of DRRI services and CAP at the All VR Meeting.
(2) Information on the formal interagency agreement with the State educational agency with respect to:

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

RIDE has contracts with the Regional Educational Collaboratives to support transition, planning, and information about adult services within each high school. Each fall, the ORS Rehabilitation Counselor, in collaboration with the local Regional Transition Coordinator (RTC), and BHDDH staff, provide an orientation to Special Education/Transition personnel about adult services in general and Vocational Rehabilitation services in particular. ORS Counselors provide and share information regarding adult services; typically, the ORS Counselor at each high school provides specific information regarding ORS services. The RTC supports the sharing and dissemination of ORS information. This “Introduction to State Services” is to inform school staff about services and eligibility for programs and includes employment/supported employment programming that may be available, as well as services from the State’s Department of Developmental Disabilities as appropriate. This Orientation meeting serves as an opportunity to reinforce the referral process to ORS (including information about potential Wait List).

In addition to the school-based interventions and consultation with the LEA, ORS is involved in each region’s Transition Advisory Committee (TAC), the statewide Transition Council, and a myriad of other system development efforts to enhance work experiences and transition for in-school youth with disabilities, regardless of IEP/504 status. Each high school has an identified ORS Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, discuss Pre-ETS, Order of Selection/Wait List, and accept referrals. The ORS Rehabilitation Counselor establishes a schedule with each school so that IEPs, CDPs, referrals, and consultation can be arranged on the days that the counselor is physically present at the school, if possible. Consultation by VR transition counselors is also available to the transition/IEP/CDP teams at LEAs.

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

ORS and each Local Education Authority (LEA) collaborate to meet the transition needs of youth with significant disabilities. Each high school has an identified ORS Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, discuss Pre-ETS, Order of Selection/Waitlist, and accept referrals.

The ORS Transition and Pre-Employment Transition Services provided to in-school youth may include Counseling & Guidance, Job Exploration and Assessments, Community-Based Work Experiences, Tri-Employment Program, Transition Academy participation, Summer Work, ORS/LEA Community Employment Projects, and travel training. The results of these interventions are shared with the student, families, and school personnel so that planning and
academic programming in school is influenced by the findings and needs identified through ORS transition services. These services are provided based on the individualized needs of each student as identified by the team, family, and student. Any career exploration, internships, or volunteer activities completed by the LEA provide valuable vocationally relevant information to the discussion and planning process. These activities are considered work experiences, and so are important to consider as ORS and the LEA plans next steps and post high school objectives and needs.

The DOJ/State Consent Decree has added some additional expectations of ORS and LEAs for in-school youth with significant intellectual disabilities (I/DD). The DOJ requires each high school to develop Career Development Plans (CDP) on all in-school youth with I/DD or those who may be eligible for adult services (many youth who qualify for DD do not have a primary disability of I/DD, i.e., Autism, Cerebral Palsy, etc.) beginning at age fourteen and reviewed annually. ORS contributes to this process through Vocational Rehabilitation Counselor attendance and/or consultation to the transition team meetings. In addition, the DOJ/State Consent Decree requires in-school youth with I/DD to experience two 60-day trial work experiences prior to graduation. Therefore, ORS services incorporate a review with the CDP team (Student, family, LEA, BHDDH & ORS representation) of any community/work experiences that have occurred. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities may include such services as: Community-Based Work Experiences, Transition Academies, Summer Employment Alliance, Summer Work, Project Search, and other work experiences. This information will assist the team and the Vocational Rehabilitation Counselor in achieving the two 60-day Trial Work Experience mandate of the DOJ/State Consent Decree.

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

ORS functions as a referral source, technical assistance, and consultation partner to the LEAs. RIDE oversees 36 different state Local Education Authority (LEA) responsibilities for oversight over IDEA. RIDE conducts periodic IDEA monitoring visits with each LEA. ORS counselors may sign up to be part of the RIDE school support visits.

Rhode Island Department of Education (RIDE) and ORS, in collaboration with Behavioral Health, Developmental Disabilities and Hospitals (BHDDH), utilize and follow the Transition Timeline, which spells out each agency’s roles and responsibilities (and at what age) for all transition-age youth and students with disabilities. It also lays out processes and services to be available at each juncture in transition. The Cooperative Agreement between ORS and RIDE does not entail any financial interchange or responsibilities. ORS is the lead agency in this CA.

(D) procedures for outreach to and identification of students with disabilities who need transition services.
The LEA identifies students with disabilities who may be eligible for transition services with ORS and facilitates a formal referral to the agency with parental approval. The LEA provides education records as part of the referral packet to ORS. Upon receipt of the referral packet, approved by the parents, the ORS Vocational Rehabilitation Counselor schedules a meeting with the student and family to explain the program, become familiar with the student, and plan next steps. The Vocational Rehabilitation Counselor will explain Pre-ETS services, Order of Selection/Wait List, and provide informed choice options, including whether to register for Pre-ETS services or apply for VR services. Eligibility determination must occur within 60 days of application, and IPE must be developed within 90 days of eligibility Category I. At times, school personnel may request Vocational Rehabilitation Counselor presence at an IEP meeting prior to a formal referral to ORS. Consultation by VR transition counselors is also available to the transition/IEP/CDP teams at LEAs.

(e) Cooperative Agreements with Private Nonprofit Organizations. Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers

An identified need, as determined by the Statewide Comprehensive Needs Assessment (CNA), labor market information, or by the individualized needs of customers, will initiate efforts to create a new service or training option. ORS relies on a fee-for-service outcome-based fee structure with a network of private vocational rehabilitation providers in order to meet the vocational rehabilitation needs of its customers. The ORS Fee-for-Service structure provides a means of evaluating and monitoring the quality of deliverables as agency-generated authorizations to the CRP/vendor, reports, outcomes, and client satisfaction are variables involved in payment for client services.

A prospective Community Rehabilitation Provider (CRP) or vendor completes an application, is vetted through the state Department of Accounts and Control, the federal System for Award Management (SAM) web-site, and the Secretary of State prior to approval by ORS. CRPs/vendors requesting approval to provide services on fee-for-service basis will be evaluated based on ORS’s need for that service/training. ORS examines the geographic, population specific, labor market, and /or training content need of the agency based on CNA, and/or client feedback. Based on these findings, in addition to the results of the core partner strategic planning sessions, ORS identifies service/training expansion needs and may approve a new service/training vendor (after completing the vetting process) on a trial basis or not approve the service/training. Pilot programs are often used with new or existing vendors, and provide an opportunity to develop, monitor and evaluate if a service delivery model (designed to meet the rehabilitation needs of a specific disability group) is effective prior to committing long term to the service. A pilot offers the opportunity to make appropriate changes to ensure a positive outcome from a new initiative.

The DOJ/State Consent Decree has added additional requirements to the approval process of CRPs who are working with youth and adults with I/DD:

- CRP staff must meet certain baseline credentialing criteria to provide Job Coaching and Job Development services to customers with significant intellectual disabilities; and,
- CRPs providing Supported Employment Services must participate in a Continuous Quality Improvement review periodically.

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

1. The SRC supports ORS’ fee-for-service model with non-profit private organizations that includes the evaluation of the quality of deliverables and outcomes to be used as variables for payment of services.
2. The SRC encourages and supports the use of pilot programs. It also encourages ORS to maintain transparency, open communication and collaboration with vendors.
3. The SRC appreciates and supports the requirements of the Consent Decree to have baseline credentialing criteria for individuals providing job coaching and job development to people with intellectual and developmental disabilities. We also note that Supported Employment Services must undergo Continuous Quality Improvement review periodically under the new State Plan. The SRC strongly encourages ORS to define the terms of the review and to specify the objectives and criteria so that providers are clear about the Continuous Quality Improvement process and how to remain in good standing.

In addition, while the SRC appreciates the statewide emphasis on the Consent Decree for individuals with ID/DD, we encourage ORS to support and implement the same process of Continuous Quality Improvement with vendors of Supported Employment services for individuals being served by the Behavioral Health community providers.

2. **The Designated State unit’s response to the Council’s input and recommendations; and the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.**

ORS would like to thank the SRC for the commentary and suggestion. The first round of CQI employment reviews will be completed in early 2020, and ORS will work with BHDDH on a plan for on-going collaborative vendor review, including adding those community mental health organizations providing SE services to the mix. While the 2014 Consent Decree did enforce such a provision, ORS has seen a great benefit of these reviews in improving the services of those agencies, and the provision of targeted technical assistance, mentoring, and training. ORS recently reviewed and revised the SE reporting formats to ensure that CRPs whose staff might have difficulty with more formalized reporting could still provide clear, concise, and objective data and recommendations. ORS could provide the SRC copies of the new format, which was piloted across three DD agencies in 2019, and is now ready to implement State-wide.
(f) Arrangements and Cooperative Agreements for the Provision of Supported Employment Services. Describe the designated State agency’s efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

The Rhode Island Office of Rehabilitation Services (ORS) continues to provide supported employment services as a means to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities. ORS has maintained involvement with two (Behavioral Health (BH) and Developmental Disabilities (DD)) Supported Employment (SE) Advisory Councils, representation on the Developmental Disabilities Council, and the RI Transition Council. WIOA expands SE services to in-school youth and obligates ORS to set aside 50% of SE grant (when available) for youth with significant disabilities age 14-24. ORS will be exploring how to integrate these SE services into the existing transition service delivery system.

ORS will continue to partner with Community Rehabilitation Providers (CRPs) of supported employment services so that customers can make informed choices about integrated competitive employment options through real work experiences. ORS sponsors and provides ongoing training and technical assistance to the supported employment CRPs. Training on supported employment regulations, policy, and core values has occurred with staff of ORS and with CRPs to increase participation in provision of the ORS Supported Employment program. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs to provide the extended supports that sustain employment for individuals with significant disabilities. Long-term supports are planned for and included in the customers’ ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each supported employment service. The IPE also identifies the CRP accepting responsibility to provide long term and intermittent support services to the individual with a disability. This shift in service delivery responsibility is well coordinated by the ORS counselor and CRP/long-term support provider so that there will be seamless access to the supports needed to sustain employment.

The time frame for transitioning an individual from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer. Although RSA has established SE caps of 24 months for adults and 48 months for youth with disabilities, ORS will be working with CRPs who provide Supported Employment Services to improve the quality and availability of employment-related services.

ORS will continue to encourage CRPs to collaborate with each other, through a quarterly meeting sponsored by ORS through the BH and DD SE Councils with BHDDH representation, to meet the diverse employment needs of significantly disabled individuals with intellectual and behavioral health issues. This collaboration is also encouraged at individual and joint meetings of the Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH), Divisions of DD and BH Supported Employment Councils. Some ORS customers not eligible for the long term supports provided by DD or BH agencies have significant functional limitations and could
benefit from the supports and job coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes. SE customers have increased the average number of hours employed, however, ORS is continuing to work with staff and vendors on improving the quality of the jobs, salary, and benefits for its’ supported employment population.

In 2014, the State of RI negotiated a Consent Decree (CD) and Interim Settlement Agreement (ISA) with the Department of Justice (DOJ) to ensure that Employment First principles and practices are utilized in planning and service delivery to adults, in-school youth, and out-school youth with significant intellectual disabilities (I/DD) who need access to the continuum of Supported Employment Services in order to work. The DOJ court order requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE) and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop, enhance and implement a service delivery system that ensures individuals, adults and youth, with I/DD have access to integrated competitive employment opportunities in order to make fully informed choices about work. The CD obligates ORS to (1) ensure in-school youth with I/DD engage in a 120-day Trial Work Experience prior to leaving high school, (2) CRP personnel providing Supported Employment job coaching and job placement services to meet certain criteria/credentials to provide services, and (3) establishment of a Continuous Quality Improvement review of each DD agency providing SE services.

CRP development will continue to meet the needs of all ORS adult, out-of-school youth and in-school youth eligible for Supported Employment services and expand on CRP access to funding source options such as Ticket to Work, Partnership Plus, and Department of Labor and Training/Governor’s Workforce Board through identification of new CRPs and enhancing current CRPs.

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

1. The SRC acknowledges that WIOA requires 50% of Supported Employment funds be dedicated to youth with the most significant disabilities. However, it also notes that the phrase “when available” is included in the Plan. The SRC concurs with the DRRI that clarification of this language would be helpful since it is not a qualifying phrase in the Act. The SRC is concerned that ORS may be adding qualifying language to the funded mandate in WIOA. We respectfully request clarification on this additional language.

2. The SRC is concerned regarding Supported Employment caps of 24 months for adults and 48 months for youth in the provision of long-term supports. We respectfully request information regarding what mechanisms and processes will be established to improve the quality and availability of long-term employment services support given the lack of funding for these services.
3. The SRC is encouraged by the increase in the average numbers of hours that clients in supported employment are employed. We note that the State Plan indicates that ORS is working with staff and vendors to improve the quality of jobs, salary and benefits for the supported employment population. The SRC respectfully requests information regarding ORS’s plan to improve services in these areas and requests regular updates regarding progress over the course of the fiscal year.

4. The SRC respectfully requests that the language regarding the Consent Decree and the obligation of ORS to provide a 120-day trial work experience prior to leaving high school for youth with I/DD be revised to reflect that the language of the Act specifically requires two 60-day trial work periods prior to leaving high school.

The Designated State unit’s response to the Council’s input and recommendations; and the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.

1.) ORS would like to clarify the statement. Generally, the RSA presents State VR agencies their federal award and identifies another $300,000 grant (historically) for SE services. Of that amount, the 50% WIOA requirement to youth is taken into consideration and utilized. However, in 2017, this grant was initially completely dropped, though a subsequent $150,000 was awarded to all states. In 2018 and 2019, this grant was not added to the RSA federal award at all. That is where the term “when available” comes into play. Nonetheless, ORS continues to offer SE services to any eligible individual, youth, student, or adult.

2.) ORS thanks the SRC for this commentary. ORS is working on the process and procedure to ensure the two-time limit caps for SE long-term supports are available and in place per Federal Regulations. We, however, do provide services on an initialized basis as every individual needs different levels of support. ORS currently explores whether the individual has long-term supports available from BHDDH and utilize those supports; however, prior to SE services commencing, if no long-term supports from BHDDH are available, ORS will focus on other methods including natural supports. ORS has not had any concerns with this being an obstacle but will work on finalizing the process/procedures this year, and provide those fact sheets, procedures, and reporting forms to the SRC once finalized (with some likely technical assistance from RSA/WINTAC.)

3.) ORS will work with BHDDH to update this report and gather data and present regular updates to RSA on information gathered.

4.) ORS thanks the SRC for this request and will take it under advisement. ORS is working with RIDE, RTCs and LEAs to ensure that the two 60-day trial work experiences take place. The RI Transition Timeline that the State Parties negotiated with the DOJ have allowed the true reflection of this requirement to follow this suggestion. ORS can provide a copy of that timeline to the SRC for review.
(g) **Coordination with Employers.** Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

(1) VR services;

The Office of Rehabilitation Services (ORS) has several existing partnerships and services that involve the business community. On a fee-for-service basis, Community Rehabilitation Program (CRP) vendors provide Community-Based Work Experiences (CBWEs) to offer clients paid, community-based, integrated work experiences consistent with client interests. This service provides a unique opportunity for ORS to assess an individuals’ work skills and behaviors within a business environment. The employer provides feedback to the agency and the client about their skills and potential in a particular occupation. Some of these assessments have resulted in a job match, while others have provided information to justify on-going education/training in the field or in some cases exploration of alternate careers. In addition, ORS coordinates with employers and potential hires in On-the-Job Training (OJT) opportunities. An adult Project Search site was developed and implemented at RI Hospital in 2018/2019.

In addition, ORS partners with the business community and a Community Rehabilitation Provider (CRP) to identify the specific training needs of large and growing businesses. ORS continues to partner with RI businesses and CRPs to provide a competitive integrative employment and work experience. One business offers a boot camp model, providing two weeks of classroom work, followed by a third consisting of half of the week in the classroom and half of the week in an employment setting, followed by up to nine weeks of paid work-based training within the actual business facilities. This prepares job candidates for the exact skill set required by the employer, and thus a successful job match. The partnership not only offers community integrated competitive employment opportunities for ORS customers, but it is also producing a qualified and specifically-trained pool of candidates.

The Workforce Development Assistant Administrator and the agency’s Employment Cadre has developed over 30 business partners with a myriad of companies in Rhode Island. When provided with job openings from these partners, alerts are forwarded to the 45 counselors who share this information with appropriate job seekers. Once a qualified job seeker has applied and after a confidential release has been obtained, ORS contacts the employer and job develops on the qualified job seeker’s behalf. ORS is exploring different business engagement models with WINTAC as a strategy to better align our Community Rehabilitation Program vendors and services with WIOA workforce development efforts. The Workforce Development Supervisor also receives daily job postings from the Department of Labor and Training, JobFindha Network, VOCcentral and NET(National Employment Team).
COMPREHENSIVE NEEDS ASSESSMENT:
ORS conducted a state-wide Comprehensive Needs Assessment (CNA) in collaboration with the SRC in 2017. This CNA incorporated a component related to the needs of the business community in order to create a foundation for developing new and innovative training and services specific to those needs.

MARKETING/OUTREACH STRATEGY: ORS will continue collaboration with its state partners and the SRC to explore development of a marketing plan to target specific business sectors. Collaboration with the Governor’s Workforce Board, the Workforce Investment Boards (WIBs), Rhode Island Department of Education (RIDE), and Rhode Island Department of Labor and Training (DLT) is critical as the state implements the Comprehensive System Change Plan (CSIP).

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

As a component of the Pre-ETS program, ORS, in collaboration with other partners, has instituted several Project Search programs within the health care industry sector. The State emphasis and commitment to Employment First principles for individuals with significant intellectual disabilities has helped to facilitate RI Project Search, a nationally recognized program with successful outcomes for persons with I/DD, becoming a reality. The first Miriam Hospital Project Search – started in 2014, was a success, and the program was replicated with Blue Cross in 2015, and an additional site in 2016 at Newport Hospital. In addition, ORS funds summer work experiences for youth since 2010. ORS has also developed two other Pre-ETS work initiatives, Summer Employment Alliance and twelve Tri-Employment programs for work experiences to potentially eligible students with disabilities. All of these work experiences are in integrated community-based work settings at minimum wage or above.

As Pre-ETS is a highly prescriptive set of services under WIOA, ORS can report on the overall numbers as identified in census as registered for Pre-ETS. Current ORS census has 1,162 identified Pre-ETS individuals.

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

The SRC is encouraged by ORS’s efforts to increase competitive employment of people with disabilities by developing relationships with over 30 business partners in a variety of industries. We respectfully request information regarding specific marketing and outreach strategies under consideration, especially as it relates to transition-aged youth and young adults with disabilities. While we congratulate ORS on serving 1,162 individuals, we respectfully recommend that setting an annual target for reaching and serving these individuals be included in the marketing and outreach strategy.
ORS would like to thank the SRC for the commentary and suggestion. With the new Common Performance Measures (CPM) dictated by WIOA still being determined, the older CPMs of applications, employment plans, and successful employment closures are no longer the focus. However, ORS has informally set these benchmarks to staff, and we can provide the SRC those numerical targets if so desired.

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

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

Rhode Island has a work incentive program called the Sherlock Plan which enables individuals with significant disabilities to maintain Medicaid while working. The Sherlock Plan is administered by the Department of Human Services (DHS). However, the complexities of increased income on other benefits such as the Developmental Disability agency’s service cost share, subsidized housing, and food stamps requires considerable coordination among the state agencies. ORS participates on a monthly case coordination team that examines the Sherlock Plan to identify obstacles, increase inter- and intra-agency collaboration, and develop possible solutions.

In addition, the Department of Justice State Consent Decree (CD) and Interim Settlement Agreement (ISA) require all individuals with significant intellectual disabilities receive benefits planning information up through a complete individualized Benefit Analysis by a Benefits Counselor. ORS is working with DHS, Behavioral Health, Developmental Disabilities and Hospitals (BHDDH), Disability Law Center, and Advocates in Action to report on obstacles to individuals, to explore increasing capacity, and to examine how the service can be reimbursed by Medicaid. ORS has collaborated with the Sherlock Center on Disabilities (RI’s University Centers for Excellence in Developmental Disabilities Education, Research, and Service (UCEDD) program) to ensure that community forums are set up to disseminate benefits counseling information to families, individuals, stakeholders, and transition aged youth as the first step in increasing knowledge of work incentives.

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

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with developmental disabilities - Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH). ORS funds an array of Supported Employment services for adults and youth with Developmental Disabilities through a fee-for-service arrangement with a network of ORS-
approved Community Rehabilitation Providers (CRPs). Many of these Supported Employment (SE) CRPs are also licensed by BHDDH to provide residential, case management, and support services to individuals with developmental disabilities. ORS continues to provide Supported Employment services as a means to enable individuals with the most significant disabilities to have access to integrated competitive employment opportunities. ORS sponsors and participates in the Developmental Disabilities Supported Employment Advisory Council and Mental Health Supported Employment Council, for Developmental Disabilities, and has a representative on the Developmental Disabilities Council. ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services through the customer-selected CRP. A Performance-Based Supported Employment pilot that began in 2017 ended in mid-2018. The program resulted in about thirty percent placement rate, but the pilot was discontinued as it had no positive effect on increasing CRP staffing.

The objective of the SE services is in integrated competitive employment as an outcome, and for VR, at a minimum of ten hours per week at commensurate wages. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs - who also rely on BHDDH funding - to provide the long-term supports that help sustain employment for individuals with significant developmental disabilities. Long-term supports are planned for and included in the customers’ ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each Supported Employment service. The IPE also identifies the CRP accepting responsibility to provide long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer. ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services.

As the funding source, ORS holds a quarterly meeting with all of the I/DD Supported Employment CRPs to ensure consistency in service delivery, appropriate employment outcomes are being reached, and to offer support. ORS and BHDDH have also enlisted technical assistance providers to explore collaborative funding to maximize SE dollars.

In 2014, the State of RI negotiated a Consent Decree (CD) and Interim Settlement Agreement (ISA) with the Department of Justice (DOJ) to ensure that Employment First Principles and practices are utilized in planning and service delivery to adults, in-school youth, and out-school youth with significant intellectual disabilities (I/DD) who need access to the continuum of Supported Employment services in order to work. The DOJ/State Consent Decree requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE), and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service-delivery system that ensures individuals, both adults and youth, with I/DD have access to integrated competitive employment opportunities in order to make fully-informed choices about work. The three state agencies are obligated by the DOJ/State Consent Decree to develop Cooperative Agreements, Data Exchange Agreements,
and joint Continuous Quality Improvement efforts as elements/requirements of the CD and ISA. These obligations have been developed and are in place currently, with quarterly reporting to the DOJ and Court Monitor on data, process, and continuous quality improvement.

(3) the State agency responsible for providing mental health services

ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with mental health issues - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH).
ORS funds an array of Supported Employment services for adults and youth with Behavioral Health issues through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRP). Many of these Supported Employment CRPs are also licensed by BHDDH to provide support services to individuals with behavioral health disabilities.
ORS sponsors and participates in the Supported Employment Advisory Council for Behavioral Health. MA level Rehabilitation Counselors function as liaisons to CRPs and agencies that offer SE services to individuals with behavioral health issues.
ORS has a referral, liaison, and consultative relationship with the CRPs and funds a continuum of Supported Employment services, through the customer-selected CRP, that are expected to culminate in integrated competitive employment outcomes. As a leader, trainer, and funding source of supported employment services, ORS engages CRPs who rely on BHDDH funding to provide the long-term supports that help sustain employment for individuals with behavioral health disabilities.
The objective of the SE services is in integrated competitive employment as an outcome, and for VR, at a minimum of ten hours per week at commensurate wages. Long-term supports are planned for and included in the customers’ ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and duration of each Supported Employment service; however, RSA has established time limits in WIOA for SE services. The IPE also identifies the CRP accepting responsibility to provide long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the individual needs of each customer and WIOA standards. ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services.
1. Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council’s report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council’s functions;

The SRC strongly recommends that ORS incorporate language that states that employment goals for integrated competitive employment must be based on the principles of person-centered planning and an informed choice process.

The State Plan notes the discontinuation of the performance-based Supported Employment pilot in mid-2018 because it did not achieve its goal of increased staffing for Supported Employment services. The SRC strongly encourages the agencies included in the Combined State Plan to address and remediate the staffing issues that CRPs are having due to low pay and high staff turnover.

The SRC believes this is a workforce development issue that has a significant impact on the quality and availability of Supported Employment services, and the right of clients to base their employment goals on informed choice, rather than being restricted by lack of services in their area due to lack of funding or staff. The CRPs do not have the capacity to meet their obligations to provide long-term supports if they do not have the staffing and funds to do so. This severely limits the ability of clients to do the work they choose in an environment of their choice and is not in alignment with the spirit of the Consent Decree.

The SRC is concerned regarding the lack of VR programming in Behavioral Health agencies offering Supported Employment services to meet the needs of individuals with mental health issues who want to work. Most of the Behavioral Health agencies staff are not trained in vocational rehabilitation services; there is high turnover; and wages are so low as to be non-competitive with other industries. Consequently, Supported Employment services, such as they are, are being provided by case managers who often have high school diplomas and no training in this area. This is another workforce development issue that needs to be addressed in the Combined State Plan so that the need for the provision of quality services for people with mental health and substance use disorders can be identified and supported through funding and professional development. The outcome for the provision of the services would be to increase the levels of awareness of the community mental health centers (and the general public) that people with mental health and substance use disorders want to work and that increased employment will result.

Additionally, the SRC strongly recommends that ORS and the Department of Labor and Training work collaboratively to increase the availability of One-Stop Centers so that they are accessible to all Rhode Islanders with disabilities. The state has reduced the number of centers in Rhode Island so that areas of the state such as Aquidneck Island and Northwest Rhode Island have no centers available to them for job exploration and training opportunities. This constitutes a lack of access that severely limits individuals with disabilities from readily participating in the workforce. Since ORS has two Memorandums of Understanding with the Rhode Island Workforce Investment Board, the SRC strongly encourages ORS personnel who are members of these boards to raise issues related to equal access and the need to expand the number of One-Stop Centers not decrease them. With the beginning of the” Let’s Go to Work” initiative in 2020, which is supported by Governor Raimondo, access to the One-Stop Centers is critical.
2. The Designated State unit's response to the Council’s input and recommendations; and the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.

ORS would like to thank the SRC for the commentary and suggestion. ORS strongly feels that all its services are individualized and person-centered and include informed choice options. ORS would like to thank the SRC for this commentary and suggestions. ORS agrees with the points made about the workforce development crisis in the provider agencies on both the DD and Behavioral Health side. ORS will be collaborating a great deal with the WIOA partners, DLT, and State Agencies on the “Let’s Get to Work” initiative, to address this issue and look to possible solutions that will increase CRP/Vendor staff capacities, and services to all individuals with disabilities. As previously stated, the two GWBs are being merged and a plan is in development for one board. ORS will actively work with the other WIOA partners and report on progress made over this next year. In addition, ORS is partnering with The Providence Center and Central Falls High School to provide Pre-ETS services to students with Behavioral Health needs with hopes to bridge the gap between youth and adult services for students with behavioral health issues.

(i) Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development. Describe the designated State agency’s procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

(1) Data System on Personnel and Personnel Development

(A) Qualified Personnel Needs. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

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

ORS has sought to recruit and retain qualified staff for all positions within the agency. Such incentives as assistance with CRC maintenance credits and ongoing professional training and support are intended to retain the staff. In addition, ORS has cultivated a relationship with local colleges and universities for Rehabilitation Counselor practicum and internship opportunities.

QUALIFIED PERSONNEL NEEDS:
In FFY 2018, ORS provided services to approximately 3,985 individuals, with an average caseload of 92. ORS has a total of 94 full-time equivalent (FTE) positions, which includes 44 MA level Vocational Rehabilitation Counselor positions. When approved ORS has continued to recruit and hire Vocational Rehabilitation Counselor for vacancies when they arise. All new counselors have Master’s Degrees in Vocational Rehabilitation Counseling. During FFY 2018 until now, fourteen (14) ORS staff retired or left the agency, leaving vacancies in the following positions: (2) VR Counselor I positions, (3) VR Supervisor positions, (1) VR Administrator, (1) Assistant Administrator/RI Works and Transition, (1) EMC System Administrator, (1) Rehabilitation Counselor, (1) Peripatologist, (1) Social Caseworker II (2) Support Staff, and (1) Case Aide.

In FFY 2019, the following positions are currently vacant after resulting promotions: one (1) VR Supervisor position, (2) two VR Counselor I positions, three (3) VR Counselor II positions, one (1) Case Aide, one (1) Rehabilitation Counselor position, one (1) Peripatologist, one (1) Social Caseworker II position, and two (2) support staff. Over the next 3- to 5-year period, ORS estimates that approximately 10-15 individuals (administrators, supervisors, counselors and support staff) will be eligible for retirement. Given the number of employees that could potentially leave state service, ORS is actively pursuing graduate students for internships with ORS via the Rehabilitation Counseling programs from local universities and colleges.

Vocational Rehabilitation Counselor I - 29
Vocational Rehabilitation Counselor II - 14 34
Supervisory - 10
Administrative - 8
Fiscal - 6
Case Aide - 3
Support Staff - 11
Social Services - 7
Direct Services - 5

(ii) the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category;

Vocational Rehabilitation Counselor I - 2
Vocational Rehabilitation Counselor II – 3
Supervisory - 1
Administrative - 0
Fiscal - 0
Case Aide - 1
Support Staff - 2
Social Services - 2
Direct Services - 1
(iii) projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Vocational Rehabilitation Counselor I - 3  
Vocational Rehabilitation Counselor II - 3  
Supervisory - 2  
Administrative - 1  
Fiscal - 4  
Case Aide - 1  
Support Staff - 2  
Social Services - 2  
Direct Services - 1  

(B) Personnel Development. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

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

ORS has cultivated a relationship with two area colleges that offer graduate training in Rehabilitation Counseling: Assumption College in Worcester, MA and Salve Regina University in Newport, RI.

(ii) the number of students enrolled at each of those institutions, broken down by type of program;

As of 2019, there are 66 students enrolled in the graduate programs (61 at Assumption College and at 5 Salve Regina University) to obtain their MA in Rehabilitation Counseling.

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

Assumption College - 24 Graduates from previous year with a MA in Rehabilitation Counseling
Salve Regina University - 2 Graduates from previous year with a MA in Rehabilitation Counseling

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

ORS has ongoing communication with Assumption College and Salve Regina University to ensure that the present and projected needs of ORS are considered in the program planning. Both offer a MA in Rehabilitation Counseling via a combination of on-campus and distance learning.

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

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

Rhode Island does not have a state-approved or recognized licensure or registration requirement for Rehabilitation Counselors. The Rhode Island Office of Rehabilitation Services has elected to base its minimum personnel standards for recruitment of counselors on the requirement of a Master’s Degree in Rehabilitation Counseling. All new Vocational Rehabilitation Counselors are required to meet the standard of a Master’s Degree in Rehabilitation Counseling from an accredited program. ORS has been able to meet the CSPD standard of filling all VR Counselor vacancies with individuals with a Master’s Degree in Rehabilitation Counseling, and expects to be able to continue to meet this standard. ORS will continue to offer practicum/internship opportunities for students in MA Rehabilitation Counseling programs, the State Internship program and will continue to work with institutions of higher education to recruit qualified individuals to fill vacancies. ORS will continue to fill all fiscal, support staff and case aide vacancies with individuals who meet state requirements for education and experience. ORS will continue to seek Commission on Rehabilitation Counselor (CRC) Certification Approval for training provided by ORS. Currently ORS has 31 VR Counselors, Supervisors, and Administrators who are CRC certified.
The 2018 Comprehensive Needs Assessment indicated the following training needs: Workforce Innovation and Opportunity Act, Effective Time Management, and Motivational Interviewing. The Strategic Planning Coordinator and Training Coordinator of ORS elicited information from staff July of 2019, to establish a list of training topics. Top areas of training need self-reported by survey respondents included: Business Engagement, Transgender population, Workforce Innovation and Opportunity Act/Performance Measures, Services for Transition School to Work population, Employee Self-Care and Supervisory Skill development, Behavioral Health and Substance Use, Autism Spectrum Disorder and Clients with a BCI, Job and Task Analysis and Transferable Skills Analysis. A training schedule is developed based upon the identified needs and will be implemented during FFY 2019 through FFY 2022. ORS anticipates a current focus on Business Engagement, Transgender population, Workforce Innovation and Opportunity Act/Performance Measures, Services for Transition School to Work population, Employee Self Care and Supervisory Skill Development, Behavioral Health and Substance Use, and Clients with a BCI. Training will also incorporate 21st century understanding of the evolving labor force and the needs of individuals with disabilities as outlined by WIOA. Through the State Office of Training and Development agency staff have the opportunity to attend trainings such as: MS Power Point, Advanced Workplace Writing, Effective Writing, Supervisory and Leadership training, etc.

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

The SRC commends ORS for its commitment to hiring only Master’s-level Rehabilitation Counselors for their vacancies. In addition, the SRC lauds ORS for the efforts it is making to recruit and retain qualified staff for all positions in the agency. The SRC strongly recommends that ORS continue to recruit all new Vocational Rehabilitation Counselors from rehabilitation counseling programs who are accredited by CACREP, since that is the new accrediting body for rehabilitation counseling. Additionally, we recommend that ORS continue to offer practicum and internship opportunities for students in both the Masters in Rehabilitation Counseling 48 credit programs and the 60 credit Clinical Rehabilitation Counseling programs. We believe that providing opportunities for Clinical Rehabilitation Counselors from accredited programs will enable ORS to better serve the burgeoning population of individuals with co-occurring mental illness and substance use disorders.
The SRC is encouraged by the range of topics presented for continuing education for the counselors based on their needs and the changing needs of their clients. The SRC strongly recommends that ORS implement opportunities for continuing education credits for counselors in two specific areas that they have identified as needing development: Motivational Interviewing and Behavioral Health and Substance Abuse Disorders. These topics have the potential of enhancing client outcomes by helping the counselors apply a wider variety of counseling techniques in their work and increasing their awareness of the impact of behavioral health and substance use issues on goal setting and employment success with the majority of populations ORS serves.

ORS would like to thank the SRC for the commentary and suggestion. We will continue the current commitments.

ORS would like to thank the SRC for the commentary and suggestion. We will address training needs and will take recommendation under advisement, and will also explore other areas where there are certain needs, including exploration of transgender issues, Pre-ETS service delivery, Supported Decision-Making, etc.

(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.

Training opportunities are provided on an ongoing basis to ensure that staff have the most current information on the labor market, best practices, and assistive technology. Through the Workforce Development System staff can attend training/orientation to WIOA partner resources held at the American Job Centers. ORS has provided information to attendees on Order of Selection, Workplace Accommodations, Assistive Technology etc.

Since December 2009, all ORS Rehabilitation Counselors hired have met the Rhode Island standard (100% compliance) of a Master’s level in Vocational Rehabilitation Counseling. All field VR Supervisors and Administrators meet the CSPD standard.
ORS continues to dedicate financial and Training Coordinator time to support the CSPD plan.
ORS continues to structure mentoring activities around specific specialization areas in anticipation of future retirements.
All existing fiscal and support staff meet or exceed state requirements for education and experience.
1. **Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council’s report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council’s functions;**

As previously stated, the SRC congratulates ORS on its commitment to hiring new Vocational Rehabilitation counselors who have a Master’s level degree in Rehabilitation Counseling and with 21st century understanding of labor force issues and the needs of individuals with disabilities. We are encouraged that this commitment remains in place and is clearly identified in the new Combined State Plan.

(4) **Staff Development.** Describe the State agency's policies, procedures, and activities to ensure that, consistent with section101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

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

ORS recognizes the importance of ensuring that staff have the necessary skills and abilities to provide quality services in a professional and timely manner. Examples of trainings offered/provided include: Ethics in Rehabilitation Counseling, disability specific trainings, Supported Employment, Customized Employment, Relationship Building with the Business Community, Social Security Administration/Ticket To Work Cost Reimbursement 101, Title II Disability Benefits and Work Incentives, 21st Century Best Practices for Job Development and Placement for VR staff, as well as for VR Vendors, HIPPA, Wellness Training, Small Business Development Overview, WIOA Performance Measures, Fiscal Office of Accounts and Controls, Supervisory Styles and When to Use Them, etc.

Training for all staff of ORS remains a priority. Examples of areas identified for future training include: Marketing of ORS, Medical Marijuana & Other Prescribed Medications: Considerations for Vocational Counseling and Employment, Business Engagement, Ticket to Work, Customized Employment, Supported Employment, disability/population specific trainings, etc. ORS will continue to promote trainings offered through the RI Learning Center which offers a range of training via Academies, Workshops, Tutorials, Webinars, etc. In order to retain qualified staff and in anticipation of additional staff retirement, ORS has and will continue to offer/promote leadership development training, succession planning, and capacity building opportunities to interested staff.

Management staff continues to include interested personnel in activities such as: assistive technology, transition, training, Community Rehabilitation Program (CRP) development, quality assurance, and strategic planning as a means of expanding agency knowledge base about these content areas.
Eight of the forty-three ORS Vocational Rehabilitation Counselors have been on the job for less than 5 years; thus, necessitating the training on vocational rehabilitation assessment, guidance and counseling, best practices, and ORS policies and procedures.
ORS believes that the next three- to four-year period is a critical time to assist newer counselors and supervisory personnel in professional development and growth to transition into positions of increased responsibility due to anticipated promotions and retirements.
ORS has developed an Employment CADRE, and after several quarters of meetings, decided to split into two separate entities, with one half of the committee performing Business Engagement activities such as Business Ambassadors, advocates, and educators to the business community. The other half of the committee will be responsible for the agency’s marketing activities and material. The Employment CADRE members also provided employment and labor information back to their regions at monthly regional meetings.
ORS relies on supervisory observations, quality assurance reviews, and self-identified training needs to enhance professional development.
The Training Coordinator and Strategic Planning Supervisor elicits input from counselors, supervisors, support staff, and administrators regarding their training needs.
If a Corrective Action Plan around personnel performance is necessary, the Corrective Action Plan would be in compliance with the CSPD, ORS regulations & procedures, and union regulations.
ORS will enlist the Employment CADRE and WINTAC to assist with enhancing staff competencies in addressing the needs of business community.

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

The SRC commends ORS for its commitment to hiring staff that have the necessary skills and abilities to provide quality services to their clients. Also, we are aware of the commitment ORS has made to continuous training for counselors and staff. We recommend that the counselors continue to receive additional trainings that enhance their professional and clinical skills to meet the needs of the new generation of clients.
The SRC respectfully requests information on the most updated plan for staff development over 2020 so that we can be made aware of the level of training and expertise of ORS staff and be able to provide up-to-date information to community members.

2. The Designated State unit’s response to the Council’s input and recommendations; and the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.

ORS thanks the SRC for this request and will keep the SRC apprised of offered trainings outside of ORS and scheduled ORS trainings.
(B) procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

ORS will continue to utilize the Job Driven Vocational Rehabilitation Technical Assistance Center (JD-VRTAC/Workforce Innovation Technical Assistance Center (WINTAC) to strengthen its knowledge of the business community and use of Labor Market Information in the provision of Vocation Rehabilitation services. ORS has enlisted the Workforce Innovation Technical Assistance Center (WINTAC) to assist ORS in addressing the following WIOA requirements: (1) Effective Implementation of Pre-ETS; (2) Increasing competitive employment outcomes through increased customized or supported employment; (3) Effective transition to the common performance outcome measures; and (4) Develop partnerships to better meet business engagement and employer supports. (6) Distribute articles and literature about WIOA and vocational rehabilitation practices at supervisory meetings, regional team meetings, and training sessions.

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

The SRC commends ORS for their collaboration with nationally recognized experts in effective implementation, workforce innovation and development, and the creation of partnerships with businesses and employers. Also, the implementation of the Electronic Case Management System will enable ORS counselors to gather more complete data regarding clients’ primary language and preferred method of communication. The SRC encourages ORS to ensure that counselors are adequately trained in the use of the decision-making model for the development of goals and decision-making by families and individuals, especially in relation to new R.I. legislation, the Supported Decision-Making Act.

2. **The Designated State unit’s response to the Council’s input and recommendations; and the designated State unit’s explanations for rejecting any of the Council’s input or recommendations**.

ORS would like to thank the SRC for the commentary and suggestion. We will address training in those and explore areas where there are certain needs, including exploration of transgender issues, Pre-ETS service delivery, Supported Decision-Making, etc.

(5) **Personnel to Address Individual Communication Needs. Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.**
Interpreters and translators are available to staff to communicate with diverse customer populations, for staff trainings, and supervision. The Electronic Case Management System allows for entry of individual’s primary language and preferred communication. ORS has two Video Relay stations to enable communication in ASL between staff who are Deaf or Hard of Hearing, their colleagues, and customers. ORS utilizes a UBIDuo communication device in order to provide another avenue for communication between staff who are Deaf or Hard of Hearing, colleagues, and customers. The Blind Service region of ORS has staff who routinely employ alternate forms of communication including enhanced print or contrasted print materials, Braille, tactile sign, software and voice over programs for text recognition, in addition to a variety of computer/electronic assistive devices and technologies. The staff of the Blind Service VR unit of ORS include VR professionals who are themselves blind, as well as those trained in vision rehabilitation teaching and technology, and whom serve as a resource for staff development and training in addition to their direct service responsibilities. The Deaf and Hard of Hearing Region at ORS has developed and produced an ASL video that explains ORS services and is available on the ORS website. Access to ORS information and services is provided through the use of the Language Line - The Big Word, interpreters from a variety of resources, and bilingual staff. ORS brochures, letters, and forms are reviewed and updated as needed when there is a change to a relevant policy, procedure, program, and or regulatory change.

(6) Coordination of Personnel Development Under the Individuals with Disabilities Education Act. As appropriate, describe the procedures and activities to coordinate the designated State unit’s comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

ORS Vocational Rehabilitation Counselors with Transition responsibilities attend an Annual Transition Conference that offers a combination of training, collaboration, and service delivery planning between the VR Counselors assigned to the LEA, teachers, and special education staff. ORS has about 30 Vocational Rehabilitation Counselors who have Transition responsibilities for providing services to in-school youth with disabilities, technical assistance to school personnel, and outreach to families. On a monthly basis, the VR Administrator and/or Assistant Administrator for Transition facilitates a meeting with all the counselors with Transition responsibilities to reinforce Pre-Employment Transition Services (Pre-ETS), training, and problem solving. At least annually, RIDE is invited to provide information about current and changing trends, regulations, and practices. VR counselors with Transition responsibilities also attend the quarterly Transition Advisory Meetings conducted by the Regional Transition Coordinators, which is an opportunity for updates on recent changes and cross training in specific areas between special educators, teachers and ORS.
Pursuant to the Act, ORS offers to the State Rehabilitation Council (SRC) the opportunity to review and comment on the CSPD. Additionally, members of the State Plan, Quality Assurance Policy Committee met with ORS representatives to provide input into the CPSD.

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

The SRC is encouraged by the continuing collaboration with RIDE regarding transition planning and responsibilities. We recognize that this relationship is strong and has resulted in an increase in the number of vocational rehabilitation counselors who have some aspect of transition responsibilities with clients on their caseload. We strongly recommend that ORS continue their outreach to in-school youth with disabilities and to expand that outreach to the middle school youth, as previously described, and to a more diverse, underserved populations.

2. **The Designated State unit’s response to the Council’s input and recommendations; and the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.**

ORS would like to thank the SRC for the commentary and suggestion. We value our collaboration with RIDE and all the LEAs we serve and will continue the current commitment.
Statewide Assessment.

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

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

The Rehabilitation Act of 1973, as amended, mandates that the Rhode Island Office of Rehabilitation Services (ORS), in partnership with the State Rehabilitation Council (SRC), complete a Statewide Comprehensive Needs Assessment (CNA) at three-year increments. The CNA is intended to identify the needs of individuals with the most significant disabilities, including those in need of Supported Employment, minorities with significant disabilities, underserved individuals, youth with disabilities and individuals with disabilities served by other components of the workforce development network. In addition, the CNA is intended to identify the need to develop or improve Community Rehabilitation Programs (CRPs). ORS views the CNA as a dynamic and evolving process that incorporates information from several diverse sources rather than from any one event or data source.

ORS and the State Rehabilitation Council (SRC) will be initiating a CNA in FFY 2021 for the 2022 State Plan. This assessment will incorporate the new WIOA regulations and focus on the rehabilitative needs of individuals with disabilities residing within the State, particularly the VR service needs of those:

• With the most significant disabilities, including their need for supported employment services;
• Who are minorities;
• Who have been unserved or underserved by the VR program;
• Who have been served through other components of the statewide workforce development system; and
• Who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

During FFY 2016/17, ORS addressed the Statewide Comprehensive Needs Assessment using several resources including:

• Community Comprehensive Needs Assessment Survey
• Customer Satisfaction Survey
• Environmental Scan of Data including: Comprehensive System Improvement Plan, Department of Labor & Training data, Bureau of Labor Statistics, Disability employment statistics, US Department of Labor Bureau, US Census Bureau, RI Department of Education and the Office of Disability Employment Policy
• Rhode Island Governor’s Commission on Disability Public Forums
• Office of Rehabilitation Services Staff Comprehensive Needs Assessment Survey
• Focus group with key staff informants
The 2017 survey conducted by ORS and the SRC was sent to 492 individuals, which included CRPs, employers, ORS staff and ORS consumers. 155 individuals completed the survey which represents a 31.5% return rate based on the 492. A broader range of the community, along with more individuals, received and answered the surveys, thus providing ORS with more information on the needs of individuals with disabilities.

The CRP survey yielded the following:
- When obtaining employment, social skills, fear of losing Social Security benefits, expectations from family and transportation are the most common challenges faced by individuals with disabilities.
- When maintaining employment, social skills, personal/home life barriers, transportation, expectations from family, fear of losing Social Security benefits and personal expectations are the most common challenges faced by individuals with disabilities.
- When obtaining employment for individuals, job availability, job matching, CRP time & resources, availability of retention & supports, insufficient job search preparation and availability of job development are the most frequent challenges faced by CRP’s.
- When maintaining employment for individuals, job matching, CRP time & resources, insufficient job search preparation and availability of job retention & supports are the most frequent challenges faced by CRP’s.
- Benefits counseling, long-term supports, case management, job coaching, work trial/internships/situational assessments and on-site job retention support are the most frequent challenges faced by CRP’s.
- 58% of CRP respondents hold the credentials to provide supported employment services.

The Employer survey yielded the following:
- Giving individuals a fair chance and helping out the community was the primary motivation in employing people with disabilities.
- Communication and the ability to effectively provide accommodations were the largest challenges faced when hiring a person with a disability.
- Accommodations, reliability, performing the necessary job duties and adaptability were the largest concerns in hiring people with disabilities.
- Joy, helping, watching employee growth and gaining valuable employees were the largest rewards in hiring individuals with disabilities.

Respondents identified the following disabilities as least served by ORS:
- Substance Abuse Related Disorders
- Intellectual Developmental Disability
- Behavioral Health

Respondents identified the following ethnic populations as least served by ORS:
- American Indian/Alaska Native
- Pacific Islander/Native Hawaiian
Employers and consumers indicated that ORS could:
- Promote awareness of ORS
- Incorporate job postings on the ORS website that matches individuals to well-suited jobs.

In 2019, ORS re-designed the monthly consumer satisfaction surveys, with input from the SRC State Plan, Policy and Quality Assurance sub-committee. The survey, designed as an ongoing tool to be distributed at set intervals, provides longitudinal data on customer satisfaction. Surveys are sent to customers who have open cases with ORS, are in post-employment plan services and employment status. The re-designed surveys assist in capturing WIOA data, were rolled-out in April 2019 and the early data is undergoing initial phases of analysis.

The following conclusions were formulated based on the results of the surveys.
- More networking with employers and knowledge of labor market.
- More training opportunities.
- Strengthening timely communication between themselves and their ORS counselor.
- Physical location of CRP’s.

The environmental scan included information from a variety of sources such as: Comprehensive System Improvement Plan, RSA data, RI Department of Labor & Training (DLT) and Department of Labor - Bureau of Labor Statistics, Disability Employment Statistics-U.S. Department of Labor’s Bureau of Labor Statistics, US Census Bureau, RI Department of Education, and Office of Disability Employment Policy. The sources indicated the following:
- Need for stronger coordination across Government and non-Government entities in the workforce system, including businesses.
- Need for better training opportunities.
- Need for more opportunities for job seekers to gain experience through internships and apprenticeships.
- RI was ranked 29th in the nation for employing people with disabilities; 34.3% of individuals with a disability in RI were employed; 76.3% of individuals without a disability in RI were employed; RI was ranked 36th in the nation in regard to employment gap between individuals with disabilities and individuals without disabilities.
- Since the last CNA, jobs in RI fluctuated: Professional & Business positions increased by 2,900; accommodation & Food Service increased by 1,600; Entertainment & Recreation increased by 200; Information jobs were unchanged; Manufacturing, Retail, Transportation and Educational Service all showed a slight decrease; Government employment decreased by 500; Health Care & Social Assistance decreased by 1,000; Construction decreased by 1,800.
- Nationally: 17% of individuals with disabilities were employed; 64.6% of individuals without a disability were employed; Unemployment rate for individuals with a disability was 12.5%; Unemployment rate for individuals without a disability was 5.9%.
• Disability in the National Workforce: 18.2% worked in the service fields (excluding protective service); 15% worked in Administrative support; 10.4% worked in Sales; 9% worked in Management, Business and Finance.

• According to the RI Department of Education, their five-year strategic plan focuses on the following: increase retention on both students and educators; promote one student to computer training philosophy; expand student access to early college and career education training programs; expand and deepen college and career counseling services, while informing youth and adults into the decision making process; reach out to business and industries to partner with schools in the development and management of career and technical education programs; collaborate with districts, education providers and business providers to offer recognized, career-ready credentials and skills transcripts; reach out to employers and internship providers to partner with school districts to complete employability skills assessments and transcripts.


Services for the South East Asian community, Native Americans, and Students with 504 plans ranked as the top opportunities to improve outcomes for underserved groups.

Workforce Innovation & Opportunity Act (WIOA) Motivational Interviewing.

Effective time management.

• Needs of Individuals with Most Significant/Significant Disabilities and Supported Employment Services:
  • Increase the capacity and knowledge base of CRPs who provide Supported Employment services
  • Improve access to vendors, awareness of cultural issues and distinctions, make services readily available for emerging populations/minorities, as well as access to services for individuals who are not English-speaking.
  • Transportation to services that are available
  • Increase the capacity of CRPs who work with individuals with Developmental Disabilities to conduct vocational evaluations and situational assessments that focus on meaningful integrated and competitive employment
  • Need for a continuum of Supported Employment services for individuals with Behavioral Health and Intellectual/Developmental disabilities.
  • Need for CRP’s to have qualified personnel to provide a continuum of services.
1. Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council’s report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council’s functions;

The SRC recognizes ORS’s commitment to collecting data over the last several years from a variety of sources: Surveys and needs assessment occurred relative to the Statewide Needs Assessment, a Survey of Community Rehabilitation Providers, employers, underserved populations, the Customer Satisfaction Survey, and the VR Counselor Comprehensive Needs Assessment. We have appreciated the opportunity to provide input to the content and process of these assessments. The most recent Customer Satisfaction Survey is currently underway with quarterly data being provided to the SRC. The SRC looks forward to continuing the collaboration with ORS to evaluate the results of these data and to work with ORS to develop and implement plans to meet customers’ and employers’ needs.

2. The Designated State unit's response to the Council’s input and recommendations; and the designated State unit’s explanations for rejecting any of the Council's input or recommendations.

ORS would like to thank the SRC for the hard work of everyone who worked to develop, modify, and review the survey.

(B) who are minorities;

- Enhance the cultural competency of ORS staff and CRPs to specific minority populations within the state
- Incorporate interpretation and communication needs into the IPE Underserved and Unserved Populations
- Engage Southeast Asian, Muslim, Liberian, Cambodian, and African American communities through outreach and marketing strategies
- Incorporate access to services for individuals who are not English-speaking.
- Ensure services are readily available for emerging populations/minorities.

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

The Comprehensive Needs Assessment (CNA) completed in 2017 identified the following as the most unserved/underserved populations served by the VR program:

- Physical Disabilities
- Intellectual and Development Disabilities
- Behavioral Health
- Mental Health
(D) who have been served through other components of the statewide workforce development system;

The Comprehensive Needs Assessment (CNA) conducted in 2017 did not identify unserved populations for that component. However, surveys from ORS staff identified that the following areas needed to improve services:

- Prepare consumers for emerging employment driven by employer needs
- ORS should be an active partner with the DLT and the employment community to promote access to employment for individuals with disabilities
- There is difficulty in gaining access to the statewide workforce development system
- High level of difficulty in knowing which programs and services are best for consumers

(E) who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

The 2017 Comprehensive Needs Assessment (CNA) identified that students with 504 plans are underserved. There were 8,400 in RI with IEP’s. This number could include students in a school setting, individuals who are home-schooled, individuals in other types of non-traditional school settings, etc.

“At-risk” students with learning disabilities do not want to be identified as having a disability; and therefore, are not potentially accessing services.

Students indicated a positive experience with ORS, and that the referral process was seamless. Students (and their parents) indicated they are unaware of the full scope of services available to them, and had difficulty understanding written materials provided by ORS.

(2) Identify the need to establish, develop, or improve community rehabilitation programs within the State;

Need to further remove the following barriers in order to strengthen the quality of services from CRPs:

- Transportation barriers, maintaining staff, access to benefits counseling and community-based job availability were challenges to delivering services and employment outcome
- Fear of losing Social Security benefits, medical coverage, family expectations, individual expectations, home life and lack of social skills are the most common personal barriers for individuals with disabilities who are seeking employment.
- Need for providers to have qualified personnel to provide a continuum of services, along with the need to increase service provider capacity.
- Assess CRPs’ ability to work with varying populations and disabilities.
Meeting the needs of the Business Community:
- Increase marketing and awareness of ORS services.
- Enhance presence at business expos and job fairs
- Provide Business Community with information on ADA and workplace accommodations

(3) Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act.

Develop materials about ORS that are easier to comprehend for both students and parents. Consider strategies on how to better connect to “at-risk” students outside of the schools, as students report feeling stigmatized.

Expand outreach to other programs, such as youth centers, family resource centers, and career & education programs.

Strengthen connections to higher education, particularly disability support service coordinators, to increase access to underserved youth and students with disabilities.

Assist schools in increasing communication and coordination for “at-risk” youth and students with disabilities.

ORS Vocational Rehabilitation Counselors with Transition responsibilities attend an Annual Transition Conference that offers a combination of training, collaboration and service delivery planning between the VR counselors assigned to the LEA, teachers and special education staff. Monthly, the VR Administrator and/or Assistant Administrator for Transition facilitates a meeting with all VR counselors with Transition responsibilities to reinforce Pre-Employment Transition Services (Pre-ETS), training and problem solving. No less than annually, RIDE is invited to provide information on regulations, practices and trends. ORS has roughly 30 VR counselors who have a responsibility to provide Transition services to youth with disabilities, technical assistance to school personnel and outreach to families.

(k) Annual Estimates. Describe:
(1) The number of individuals in the State who are eligible for services.

For FFY 2020, ORS has a goal of 1,179 new applicants and expects 1,214 individuals to become eligible. ORS anticipates that 268 new Individualized Plans for Employment will be developed, and 540 successful outcomes achieved. As of July of FFY 2019 ORS has 595 new applicants and has determined 510 individuals eligible. New Individual Plans for Employment have been developed with 135 and 325 individuals have been closed successfully.

For FFY 2021, ORS has a goal of 1,180 new applicants, with 1,215 individuals to become eligible for ORS services. ORS anticipates that 269 individuals will develop Individualized Plans for Employment, and projects 541 successful outcomes.

In FFY 2022, ORS projects 1,181 new applicants, with 1,216 individuals to become eligible for ORS services. ORS anticipates that 270 individuals will develop Individualized Plans for Employment, and projects 542 successful outcomes.
(2) The number of eligible individuals who will receive services under:

(A) The VR Program;

As of 12/19/17 all OOS Categories I, II, and III were closed. As money and staff resources become available, individuals will be taken from the Category I Waitlist by date of application. In FFY 2018 ORS received additional Federal and State funding which allowed for 25 Priority Category I individuals to be moved in November 2018 off the Waitlist into services. ORS will continue to monitor fiscal and staff resources with a goal of continuing to move 25 clients per month off the Wait List.

OOS Category I - 2,016
OOS Category II - 3
OOS Category III - 0
Maintain Employment - 0
Total - 2,019

(B) The Supported Employment Program;

In FFY 2020, the projected number of Title VI to be served under an IPE is 430

(C) each priority category, if under an order of selection.

OOS Category I - Title VI: 430
OOS Category II - Title VI: 0
OOS Category III - Title I: 0
ORS will take individuals off the Category I wait list as funds are available for services by date of application and will continue to assign to the wait list eligible clients who meet criteria for Category II or Category III, however ORS does not anticipate opening the waitlist for any category during FFY 2020 through FFY 2022.

For FFY 2020 through FFY 2022, ORS will serve individuals with the most significant disabilities Priority Category 1 first and individuals with a significant disability Priority Category 2 second. All other individuals with a disability who cannot be classified in a higher Priority Category will be placed in Priority Category 3.

(3) The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection;

As of 7/23/19 the OOS Waitlist is 812. Of this number, 556 are OOS Category I, 222 are OOS Category II, and 34 are OOS Category III. Each month, ORS averages 40 Category I admissions and 10 Category II admissions and 2 Category III admissions, so 52 clients will be admitted to the Waitlist for each month of FFY 2020. For FFY2021, it is anticipated that by 10/30/20, 496 clients will be on the Waitlist. In FFY 2018 ORS received additional Federal and State funding which allowed in November of 2018 for ORS to begin moving monthly 25 Priority Category I individuals off the Waitlist into services. ORS will monitor funding and staff resources quarterly for availability to move clients in Category I off the Waitlist based on date of application.
1. **Input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council’s report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council’s functions;**

We are aware that ORS is gradually reducing the number of individuals who are on the wait list due to the prior order of selection. We are encouraged by the fact that as much as 50 individuals are being moved off the wait list on a monthly basis. The SRC respectfully requests that ORS provides the SRC with updated data on the number of individuals on the wait list at the regularly scheduled in-person SRC meetings. In addition, we would like to be made aware of any changes that resulted in an increase in the numbers on the wait list and plans to reduce those numbers going forward.

2. **The Designated State unit's response to the Council’s input and recommendations; and the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.**

ORS will provide regular updates on the waitlist and will provide information about any changes needed on plans to reduce or modify those numbers.

(4) The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

For FFY2021, OOS Category I - Title I: $2,653,903 based on following calculation:

$1,249.48 \times 2,124 = $2,653,903

- Identify high turnover and/or specialized skill positions
- Establish training program specific to sector positions
- Enlist trainers to build and implement a training curriculum
- Pilot, modify, and replicate
- Establish a system to disseminate information to VR Counselors
- Encourage WIOA partners to include a requirement in RFPs that targets individuals with disabilities
- Explore development of consistent processes and methodology of On-the-Job Training (OJT)
- Explore opportunities with all State Partners for collaborative funding models for service delivery.
- Explore options under Science, Technology, Engineering and Math (STEM) for business sectors.
I) State Goals and Priorities. The designated State unit must:

(1) Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

The Rhode Island Office of Rehabilitation Services’ (ORS) goals and priorities, regulations, and planning activities are jointly agreed upon by the state agency and the State Rehabilitation Council (SRC). These goals are generated from the Statewide Comprehensive Needs Assessment (CNA), compliance with federal Performance Measures as stated in WIOA, monitoring reviews, quality improvement findings, and feedback from customers, advocates, and other stakeholders. Inherent in these goals is the belief that ORS will assist individuals with significant disabilities to move toward achievement of vocational goals, career development, and increased self-sufficiency.

(2) Identify the goals and priorities in carrying out the VR and Supported Employment programs.

GOAL 1: TO INCREASE INTEGRATED COMPETITIVE EMPLOYMENT OPPORTUNITIES FOR ORS CUSTOMERS COMPARED TO TOTAL SUCCESSFUL EMPLOYMENT CLOSURES FROM PREVIOUS YEAR.

OBJECTIVE 1: Partner with an additional two to three sector businesses to address personnel recruitment and training needs

OBJECTIVE 2: Utilize participation on Governor’s Workforce Board, Workforce Investment Boards, and other advisory groups to gather current information about business sector needs and state responses

- Implement and coordinate Project Search sites already in process and new one in development for adults with IDD. Utilize Viability, a current ORS vendor, to coordinate the two Business/ORS training-employer partnerships.
- Partner with an emerging, high wage business sector
- Increase business engagement activities by VR counseling staff
- In-School Youth with Disabilities: enhance and expand the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. ORS will establish an outreach to 504 Coordinators for Pre-ETS service identification to identify “at risk” youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services. ORS has initiated a pilot to 10 middle schools to introduce Pre-ETS services to students and is planning on expanding that to more LEAs.
- Adults with Disabilities: ensure a wide array of service providers and training programs enable customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.
- Design and modify programs and services as changing needs of customers are
• Continue to implement a Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State Consent Decree. ORS and BHDDH will monitor Quality Improvement Plans generated by QI visits on a quarterly basis and will provide documentation to DOJ court monitor.
• Implement training opportunities for SE vendors in assessment, job development, and coaching.
• Conduct quarterly VR meetings with SE vendors to reinforce and strengthen Employment First principles and practice.
• Support and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings.
• Encourage vendors to provide a full continuum of SE Services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services
• Examine and modify, as needed, the VR fee structure to ensure it rewards integrated employment outcomes.

OBJECTIVE 3: Develop, implement, and replicate the successful business partnerships already operating

GOAL 2: TO PROVIDE A FLEXIBLE SERVICE DELIVERY SYSTEM THAT PREPARES CUSTOMERS FOR EMPLOYMENT AS EVIDENCED BY AN INCREASE IN COMPETITIVE EMPLOYMENT OUTCOMES FROM THE PREVIOUS YEAR.

OBJECTIVE 1: Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into competitive integrated employment.

OBJECTIVE 2: Change the culture of Supported Employment (SE) vendors to expect that competitive integrated employment is the goal from services.

• Replicate the Continuous Quality Improvement (CQI) process for training for rehabilitation services vendors.
• Develop and implement training opportunities for SE vendors in assessment, job development, and job coaching.
• Research and evaluate specific services and correlation with employment outcomes as part of QI process to identify areas needing enhancement.
• Offer RFPs that are designed to provide innovative services, in collaboration with business and industry specific sectors, which result in increased employment outcomes.
• Participate on the WIOA Interagency Workgroup
• Determine the “what and how” of contributing ORS data to state reporting requirements
• Continue to educate staff to the new data elements that are required and need to be maintained, be timely, and accurate
• Obtain guidance from RSA to establish specific numerical targets
• Determine how to collect baseline data on performance measures
• Participate in Technical Assistance opportunities on capturing performance measures
• Determine eligibility within 60 days of application
• Develop the Individualized Plan for Employment (IPE) within 90 days of eligibility determination
• Utilize MIS to track adherence to these standards on a quarterly basis
• Provide weekly updates to Administration, BHDDH, and Executive Office of Health and Human Services (EOHSS) to identify Wait List number broken down by Category and Consent Decree population
• Provide Staff Training on assessment, eligibility determination, functional limitations, and priority categorization
• Maintain and update ORS website to report on number of individuals currently on Wait List
• Develop process for fiscal forecasting monitoring
• Identify other WIOA partners and resources for persons applying for services and placed on Wait List
• Continue to monitor Wait List on a quarterly basis

OBJECTIVE 3: Ensure vendor competence for provision of vocational services and training program that result in competitive integrated employment outcomes.

GOAL 3: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA STANDARDS OF PRACTICE AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING AND STATUS CHANGE EXPECTATIONS OF RSA.

OBJECTIVE 1: Meet WIOA performance accountability measures
OBJECTIVE 2: Meet RSA requirements for eligibility and plan development
OBJECTIVE 3: Monitoring Wait List

OBJECTIVE 4: Provide agency staff with up to date tools and technology that enhance delivery of services to customers and capture reportable data
• Provide Staff Training and support as the agency transitions from System7 to InFormed Electronic Case Management/MIS System
• Develop a wage interface tool with Libera to capture WIOA Post Exit wage data
• Utilize the Work # available through DHS to capture WIOA Post Exit wage data for cases not available in the RI UI data base
• Work with the Governor’s Workforce Board to enable ORS designation as a Performance Accountability and Customer Information Agency (PACIA) with the State Wage Information System (SWIS)
Goal 1: To Increase Integrated Competitive Employment Opportunities for ORS Customers
The SRC strongly supports ORS’s priorities for the VR Supported Employment program for their fiscal year 2020 through 2021. Of special note is the goal to increase integrated, competitive employment opportunities for ORS customers by partnering with two to three businesses sectors and increased participation with the Governor’s Workforce Board. Although, there are current successful business partnerships which are already in operation, we encourage ORS to not only replicate those successful partnerships, but to create different models within the business community to achieve a wider range of employment options for their customers in new business sectors.

Goal 2: Creating a Flexible Service Delivery System That Increases Competitive Employment Outcomes over the Previous Year
The SRC recognizes that Objective 1 And Objective 2 are closely intertwined. Establishing an array of services that are flexible to meet the needs of individuals from a variety of populations cannot occur without a change in the culture of the vendors who provide Supported Employment services. Earlier comments in this document expressed the need for the change in culture, additional training and professional development of providers, and funding to see these objectives met.

The SRC strongly supports the need for the state to increase the financial support of the vendors so that ORS can increase the amount of quality of Supported Employment services for more diverse people with disabilities in more areas of the state.
We must express great concern regarding the lack of competence of many vendors currently providing Supported Employment services for ORS clients. For the reasons previously stated, this is of utmost urgency to meet our goal of increasing employment of people with disabilities in Rhode Island.

Goal 3: Data Collection and Reporting Methods
The SRC recognizes that ORS has met WIOA performance accountability measures and RSA requirements for eligibility and plan development protocols. They are consistently monitoring and updating the wait list and providing that information to the SRC in a timely fashion. In addition, they are providing agency staff with the data tools of technology needed to properly serve clients and capture reportable data, especially with the implementation of the new data management system.
2. The Designated State unit’s response to the Council’s input and recommendations; and the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.

Goal 1: To Increase Integrated Competitive Employment Opportunities for ORS Customers
ORS thanks the SRC for this suggestion and will provide regular updates/information about any business partnerships developed. Business engagement activities will be a key focal point for the agency for the upcoming year (maybe longer.)

Goal 2: Creating a Flexible Service Delivery System That Increases Competitive Employment Outcomes over the Previous Year
ORS would like to thank the SRC for this commentary and suggestions. ORS agrees with the points made about the workforce development crisis in the provider agencies on both the DD and Behavioral Health side. ORS will be collaborating a great deal with the WIOA partners, DLT, and State Agencies on the “Let’s Get to Work” initiative, to address this issue and look to possible solutions that will increase CRP/Vendor staff capacities, and services to all individuals with disabilities. As previously stated, the two GWBs are being merged and a plan is in development for one board. ORS will actively work with the other WIOA partners and report on progress made over this next year. Additionally, ORS will work with BHDDH on a plan for ongoing collaborative vendor review, including adding those community mental health organizations providing SE services to the mix. ORS has seen a great benefit of these reviews in improving the services of those agencies, and the provision of targeted technical assistance, mentoring, and training.

Goal 3: Data Collection and Reporting Methods
ORS appreciates the recognition and continued support of the SRC.

(3) Ensure that the goals and priorities are based on an analysis of the following areas:

(A) the most recent comprehensive statewide assessment, including any updates;

Goals and priorities established were based on results of FFY 2017 Comprehensive Needs Assessment, input from the State Rehabilitation Council, and feedback from RI Department of Education (RIDE), employers, CRPs, ORS staff, and clients through client surveys. The next Comprehensive Needs Assessment will be for FFY 2021.

(B) the State’s performance under the performance accountability measures of section 116 of WIOA;

ORS and the SRC identified (Goal 3) that ORS will need to develop data collection and reporting methods that meet the new WIOA performance measures and RSA standards of practice. ORS is currently building the baseline for new WIOA performance measures. In order to meet this goal, ORS plans to continue to participate on the WIOA Interagency Workgroup, to determine the “what and how” of contributing ORS data to state reporting requirements, to educate staff
to the new data elements that are required and need to be maintained, to obtain guidance from RSA to establish specific numerical targets, to determine how to collect baseline data on performance measures and to enlist Technical Assistance opportunities on capturing performance measures.

(C) other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

Results of 2017 RSA Monitoring Site Visit are still pending.

(m) Order of Selection. Describe:
(1) Whether the designated State unit will implement and order of selection. If so, describe:

(A) The order to be followed in selecting eligible individuals to be provided VR services.

The Rehabilitation Act, as amended, requires that an Order of Selection for Services be instituted any time that limited resources impede the agency from providing services to all eligible consumers. The Office of Rehabilitation Services (ORS) implemented an Order of Selection within its VR program in 2010. Based on a functional assessment in each of the seven areas of life functioning, eligible individuals are assessed according to the significance of their disability, as defined in the Rehabilitation Act, section 7(21)(A): ...the term "individual with a significant disability" means an individual with a disability -(i) who has a severe physical or mental impairment which seriously limits one or more functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) in terms of an employment outcome;(ii) whose vocational rehabilitation can be expected to require multiple services over an extended period of time; and(iii) who has one or more physical or mental disabilities resulting from ... or another disability ... to cause comparable substantial functional limitations.

First priority will be given to consumers with the most significant disabilities or consumers classified in the Order of Selection as Category I. This category refers to a consumer who has a most significant disability if a mental or physical impairment exists that seriously limits four or more functional capacities in terms of an employment outcome and whose vocational rehabilitation requires multiple services over an extended period of time.

Second priority will be given to consumers with significant disabilities. A consumer has a significant disability if a mental or physical impairment exists that seriously limits two or three functional capacities in terms of an employment outcome and whose vocational rehabilitation requires multiple services over an extended period of time.

Third priority will be given to other eligible consumers who have a disability that seriously limits one functional capacity in terms of an employment outcome and requires two or more services over an extended period of time.
Extended period of time: Six months or more.
Multiple services: Requiring two or more primary services.
ORS began assigning eligible clients to the Wait List on 12/19/17 who meet the criteria for Category I and will continue to assign to the Wait List eligible clients who meet criteria for Category II or Category III.
For FFY 2021 through FFY 2022, ORS will serve individuals with the most significant disabilities Priority Category I first and individuals with a significant disability Priority Category II second. All other individuals with a disability who cannot be classified in a higher Priority Category will be placed in Priority Category III.

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

The order to be followed in selecting eligible individuals to be provided VR services.
The SRC understands that the Rehabilitation Act of 1973, as amended, requires that an Order of Selection (OOS) be implemented when limited resources prohibit ORS from providing services to all eligible clients. We recognize that ORS has been prioritizing services based on need. Since the OOS has been discontinued at this time, and the waitlist is declining, we respectfully request that ORS provides the SRC with regular updates regarding the number of individuals moving off the waitlist and into VR services. Additionally, we support DRRI’s position that individuals meeting the criteria for Category I be made aware of their right to appeal the OOS selection criteria. We strongly recommend that these individuals are given timely notice of their right to appeal and are provided contact information regarding CAP for assistance.

2. The Designated State unit’s response to the Council’s input and recommendations; and the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.

ORS will provide regular updates to the SRC regarding the status of the continued OOS, waitlist and exploring the feasibility of serving individuals identified Category 2. ORS provides the mediation and CAP assistance information to any individual who is placed on the waitlist, and the letter also includes both category assignment and CAP information. ORS does request updated DRRI materials with the current changes in name, address, contact information and fact sheet included.
In FFY 2010 due to retirements, budget constraints, promotions, sick leaves and workforce reductions, ORS implemented an Order of Selection that involved prioritizing services to Category I individuals with the most significant disabilities. All Category II and Category III individuals were placed on a Wait List for services. When resources have become available, Category II eligible clients have been moved off the Wait List. It was anticipated, at the time, that this restriction would continue through FFY2019.

At the conclusion of FFY 2017, ORS was confronted with additional budget constraints, increased costs of services and agency obligations to comply with a Department of Justice Consent Decree. ORS requested $5,000,000 in re-allotment VR funds and received $532,198, as a portion of the funds was used to assist hurricane-affected states. The culmination of these factors is impeding the agency’s ability to provide services to all eligible individuals with the most significant disabilities, thus necessitating closure of all categories in the Order of Selection. During FFY 2018/2019 ORS continued to face the concerns noted at the end of FFY 2017, which necessitated continued closure of all categories in the Order of Selection. In FFY 2019, the agency requested $5,000,000 in re-allotment funds and received $1,150,157. While funding constraints remain a concern, the additional funding enabled ORS to begin taking 25 individuals assigned to Priority Category I, off the Wait List the first of every month, as of November 2018, based on date of application. As resources allow, ORS will continue this practice on the first of every month.

The Order of Selection does not discriminate against any person by type of disability, economic status, race, color, national origin, disability, political beliefs, sexual orientation, age, religion, sex, or protected class.

Projections for numbers to be served in FFY 2021 through FFY 2022 are based on the current census. These numbers reflect those currently being served or projected to be served as resources allow, and ORSs ability monthly to continue to move 25-50 individuals assigned to Priority Category I off the Wait List. ORS will remove additional people based on additional funds becoming available. a. All categories will remain closed; thus, the numbers below do not reflect any individuals who are determined eligible and placed on a wait list after all categories are closed, or clients who have been found eligible, but have not begun to receive services under an IPE.

Order of Selection (OOS):
- OOS Category I: 2016
- OOS Category II: 3
- Maintain Employment Clients: 0

The goal for all the customers referenced by the Order of Selection categories is an employment outcome. This employment outcome reflects the individual’s informed career choice that has evolved from information about skills, interests, preferences, abilities and the labor market. The Individualized Plan for Employment (IPE) is then developed to reflect that choice and the specific services/interventions needed by the individual to reach that
employment outcome. It is anticipated that multiple services will be necessary over an
extended period of time in order for the individual to reach their employment goal.

(D) The time within which these goals may be achieved for individuals in each priority
category within the order.

Quantifying the length of time an individual is active with ORS is difficult as the necessary
services, duration, and outcome is individualized to the needs of each customer. Projections
based on recent performance:
Priority Category I - 36 Months
Priority Category II - 13 Months
Maintain Employment Clients- N/A

(E) How individuals with the most significant disabilities are selected for services before
all other individuals with disabilities.

ORS assures that its Order of Selection (OOS) policy gives first priority to individuals with the
most significant disabilities, Priority Category I. Services are delivered within a comprehensive,
coordinated program that is designed to assist these individuals to prepare for and engage in
gainful employment in an integrated setting. Beginning 12/19/17, ORS closed all categories and
will take individuals off the Category I Wait List as funds are available for services by date of
application. ORS does not anticipate opening the Wait List for any category during FFY 2021/FFY
2022. In FFY 2018, ORS discontinued the option of serving individuals with a disability who
otherwise would not meet the OOS priority category for services and who are currently
employed and at risk of job loss due their disability and who could benefit from VR services to
maintain employment. ORS believes consumers who are on the wait list and in Category I need
to be the top priority. ORS will revisit this through an amendment if additional funding becomes
available and ORS is able to open Category I.

ORS notifies all individuals who do not meet the current Order of Selection and provides
information and referral services. These alternative resources are intended to assist in
obtaining employment and related services through such Workforce Development resources as
the American Job Centers. Individuals are re-assessed when additional information about their
functional limitations is received, following the OOS classification decision.

One exemption to placement on the Wait List follows:
Pre-Employment Transition Services (Pre-ETS): These ORS services are provided to students
with disabilities in collaboration with each Local Education Authority (LEA) or other school
program. Students receiving Pre-ETS prior to application and/or eligibility determination may
continue to receive Pre-ETS services. Conversely, students determined eligible prior to
beginning Pre-ETS services, will not receive them until they are taken off the wait list according
to the priority category assigned. These Pre-Employment Transition Services, which fall under
the regulations implementing the 2014 Workforce Investment Opportunities Act (WIOA)
amendments to the Rehabilitation Act of 1973 to help prepare students for employment after
high school. The Office of Rehabilitation Services strives to assist all students with significant
disabilities who choose to work, gain the necessary skills, preparation, exploration and supports to enter the workforce.

(2) If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.

No. ORS and the SRC continue to have discussions at the SRC meetings regarding Order of Selection changes, impact and implementation. The SRC has offered feedback, guidance and support throughout the process with the goal of ensuring transparency to individuals seeking VR services and educating the Community Rehabilitation Programs. ORS began assigning eligible clients to the Wait List on 12/19/17 who meet the criteria for Category I and will continue to assign to the Wait List, eligible clients who meet criteria for Category II or Category III.

For FFY 2021 through FFY2022, ORS will serve individuals with the most significant disabilities Priority Category I first, and individuals with a significant disability Priority Category II second. All other individuals with a disability who cannot be classified in a higher Priority Category will be placed in Priority Category III.

- Identify high turnover and/or specialized skill positions
- Establish training program specific to sector positions
- Enlist trainers to build and implement a training curriculum
- Pilot, modify, and replicate
- Establish a system to disseminate information to VR Counselors
- Utilize internal group, Employment Cadre, to work on business engagement, marketing, and increasing business contacts
- Develop a spread sheet available to ORS staff, listing all employers who are currently engaged & invested in working with ORS consumers for employment outcomes
- Encourage WIOA partners to include a requirement in RFPs that targets individuals with disabilities
- Explore development of consistent processes and methodology of On-the-Job Training (OJT)
(n) Goals and Plans for Distribution of title VI Funds.
(1) Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.

The Rhode Island Office of Rehabilitation Services’ (ORS) goals and priorities, policies, and planning activities for FFY 2021-FFY 2022 are jointly agreed upon by the state agency and the State Rehabilitation Council (SRC). These goals are generated from the Statewide Comprehensive Needs Assessment (CNA), compliance with RSA practice standards, as stated in WIOA, monitoring reviews, the Department of Justice (DOJ) State Consent Decree and Interim Settlement Agreement, quality improvement findings, and feedback from customers, advocates, and other stakeholders. Inherent in these goals is the belief that ORS will assist individuals with significant disabilities to move toward achievement of vocational goals, career development, and increased self-sufficiency.

GOAL 1: TO INCREASE INTEGRATED COMPETITIVE SUPPORTED EMPLOYMENT OUTCOMES FOR ORS CUSTOMERS WITH THE MOST SIGNIFICANT DISABILITIES COMPARED TO SUCCESSFUL SUPPORTED EMPLOYMENT OUTCOMES FROM PREVIOUS YEAR.

OBJECTIVE 1: Partner with two to three sector businesses to address personnel recruitment and training needs.
OBJECTIVE 2: Utilize participation on Governor’s Workforce Board, Workforce Investment Boards, and other advisory groups to gather current information about business sector needs and state responses
OBJECTIVE 3: Develop, implement, and replicate the successful business partnerships already operating
  • Expand Project Search, targeting in-school youth and adults with the most significant disabilities, from four to five sites
  • Enlist GWB, BHDDH and several current ORS vendors, to develop an interagency, cross-disability employment initiative with additional Business/ORS training-employer partnerships
  • Develop regionalized employment centers from that initiative
  • Students with Disabilities: enhance and expand the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work experiences to youth. ORS will establish an outreach to 504 Coordinators for Pre-ETS service identification to identify “at risk” youth with behavioral health and learning disabilities who are potentially eligible but may not be accessing services. Expand pilot of Pre-ETS services for 10 middle schools State-wide.
  • Adults and Youth with Disabilities: ensure a wide array of service providers and training programs to enable customers to obtain meaningful, quality employment as rapidly as possible, considering the occupational goal of the individual and the labor market.
  • Design and modify programs and services as changing needs of customers are identified.
• Continue to implement a Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State Consent Decree. ORS will monitor Quality Improvement Plans generated by QI visits on a quarterly basis.
• Implement training opportunities for SE vendors in assessment, job development, and job coaching.
• Participate in regular meetings with SE vendors and BHDDH staff to reinforce and strengthen Employment First principles and practices.
• Support and participate in the SE Developmental Disability (DD) and SE Behavioral Health (BH) vendor meetings.
• Encourage vendors to provide a full continuum of SE Services and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of full continuum of services
• Examine and modify, as needed, the VR fee structure to ensure it rewards integrated employment outcomes.
• Explore a customized employment pilot on a fee for service basis with CRPs interested in providing it.
• Provide training and support to enhance business engagement activities.

GOAL 2: TO PROVIDE A FLEXIBLE SUPPORTED EMPLOYMENT SERVICE DELIVERY SYSTEM, BASED ON EMPLOYMENT FIRST PRINCIPLES AND PRACTICES THAT PREPARES CUSTOMERS FOR EMPLOYMENT AS EVIDENCED BY INCREASED COMPETITIVE EMPLOYMENT OUTCOMES.

OBJECTIVE 1: Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into competitive integrated employment.
OBJECTIVE 2: Change the culture of Supported Employment (SE) vendors to expect that competitive integrated employment is the goal from services.
OBJECTIVE 3: Utilizing Employment First principles/Let’s Get to Work, coordinate and initiate a Statewide expansion of the culture of employment for persons with disabilities.
• Continue to collaborate with Governor’s Workforce Board (GWB), Department of Labor and Training (DLT), Behavior Health Developmental Disabilities and Hospitals (BHDDH) and Sherlock Center on Disabilities to build upon business engagement, identifying and remediating barriers to employment and developing strategies for possible regionalized job development.
• Utilize ORS and BHDDH prospective technical assistance providers (SELN and WINTAC) to explore how to develop a marketing plan that targets outreach to employers and increased business engagement.
• Support and participate in the development of a “roadmap” to access employment services and benefits counseling for distribution to entrance points i.e. hospitals, rehabilitation centers, etc.
• Encourage and support SE CRPs/proposed employment collaboratives to become Social Security Ticket to Work Employment Networks (EN) and engage in Partnership Plus option with ORS.
• Explore with State parties’ models of braided, blended and pooled funding. • Replicate the Continuous Quality Improvement (CQI) process for training for rehabilitation services vendors.
• Develop and implement training opportunities for SE vendors in assessment, job development, job coaching and business engagement.
• Research and evaluate specific services and correlation with employment outcomes as part of QI process to identify areas needing enhancement.
• Offer opportunities that are designed to provide innovative services, in collaboration with business and industry specific sectors, which result in increased employment outcomes.
• Participate on the WIOA Interagency Workgroup
• Determine the “what and how” of contributing ORS data to state reporting requirements and cooperating with State-wide partners of data sharing agreements.
• Continue to educate staff to the new data elements that are required and need to be maintained, be timely, and accurate.
• Obtain guidance from RSA to establish specific numerical targets.
• Determine how to collect baseline data on performance measures.
• Continue to participate in Technical Assistance opportunities on capturing performance measures.

OBJECTIVE 4: Ensure vendor competence for provision of vocational services and training program that result in integrated competitive employment outcomes.

GOAL 3: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA STANDARDS OF PRACTICE AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING STANDARDS

OBJECTIVE 1: Meet WIOA performance accountability measures.
Determine eligibility within 60 days of application.
• Develop the Individualized Plan for Employment within 90 days of eligibility determination.
• Utilize MIS to track adherence to these standards on a monthly basis.
• Ensure that counselors are utilizing appropriate waivers for eligibility and plan development.
• Ensure that client’s vocational goals are consistent with other state partners BHDDH vocational goals.
• Continue to provide weekly updates to Administration and Office of Health and Human Services to identify wait list number broken down by Category and Consent Decree population.
• Continue to provide Staff Training on assessment, eligibility determination, functional limitations, and priority categorization.
• Maintain and update ORS website to report on number of individuals currently on Waitlist
• Monitor fiscal forecasting to determine when to move individuals off the Waitlist.
• Identify other WIOA partners and resources for persons applying for services and placed on waitlist.
• Enhance the Transition program and service options within each high school to coordinate and deliver Transition that provide services and work experiences to youth and students with disabilities in order to reach a competitive integrated employment outcome.

OBJECTIVE 2: Meet RSA requirements for eligibility and plan development.
OBJECTIVE 3: Monitoring Wait List
OBJECTIVE 4: Provide agency staff with up to date tools and technology that enhance delivery of services to customers and capture reportable data
  • Provide Staff Training and support as the agency transitions from System7 to InFormed Electronic Case Management/MIS System
  • Develop a wage interface tool with Libera to capture WIOA Post Exit wage data
  • Utilize the Work # available through DHS to capture WIOA Post Exit wage data for cases not available in the RI UI data base
  • Work with the Governor’s Workforce Board to enable ORS designation as a Performance Accountability and Customer Information Agency (PACIA) with the State Wage Information System (SWIS)

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

Goal 2; Objective 3: Utilizing Employment First Principles for Let’s Get to Work and a Statewide Expansion of the Culture of Employment for Persons with Disabilities
The SRC cannot overemphasize the importance of expanding the culture of employment for people with disabilities in R.I. As previously discussed in earlier sections, we strongly support increased competency training in Supported Employment and innovative programming to recruit, train, and retain Supported Employment staff to provide a range of employment services to individuals with disabilities.

2. *The Designated State unit's response to the Council’s input and recommendations; and the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.*
ORS would like to thank the SRC for this commentary and suggestions. ORS agrees with the points made previously about the workforce development crisis in the provider agencies on both the DD and Behavioral Health side. ORS will be collaborating a great deal with the WIOA partners, DLT, and State Agencies on the “Let’s Get to Work” initiative, to address this issue and look to possible solutions that will increase CRP/Vendor staff capacities, and services to all individuals with disabilities. As previously stated, the two GWBs are being merged and a plan is in development for one board. ORS will actively work with the other WIOA partners and report on progress made over this next year.

(2) Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

(A) the provision of extended services for a period not to exceed 4 years;

WIOA obligates ORS to set aside 50% of the Title VI grant for youth with the most significant disabilities age 14-24. ORS anticipates that each population of youth will need different SE services and approaches to engage, explore, and prepare for employment.

Students with disabilities in need of SE Services:

- Implement Project Search, targeting in-school youth and students with disabilities with the most significant disabilities, at three sites.
- Increase the number of Summer Work experiences.
- Refine the Job Exploration service to utilize discovery principles and career exploration opportunities.
- Develop the capacity and process for providing Job Coach supports for community-based work experiences.
- ORS will educate customers, families, and vendors to plan long-term supports prior to the conclusion of ORS SE services.
- ORS plans to track expenditures for SE set-aside on a monthly basis.
- Engage Department of Labor and Training (DLT) Youth Centers, One-Stop Centers, Adult Education Programs, Mental Health agencies, and DD Agencies to identify out-of-school youth in need of SE services.
- Build SE agency capacity to provide a continuum of services.
- Facilitate referrals to Department of Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH) of youth in need of SE services so that long term supports can be available to sustain employment.
- ORS will educate customers, families, and vendors to plan long-term supports prior to the conclusion of ORS SE services.
- ORS plans to track expenditures for SE set-aside on a monthly basis.
- Youth Out-of-School in need of SE Services
(B) how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

Enlist Rhode Island Department of Education (RI-DoE), BHDDH, Department of Human Services (DHS), and ORS to ensure collaborative funding methods support the provision of SE services as part of Transition and Pre-ETS. Establish increased knowledge about each state agency’s responsibility for funding, adults and youth, SE services in collaboration with each state partner, and the SE vendor community. Maximize existing youth resources, such as DLT Youth Centers.

(o) State’s Strategies. Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. The methods to be used to expand and improve services to individuals with disabilities.

ORS plans to expand and improve services through: (1) improved relationships with the business community, (2) staff training focused on client preparation for an employment outcome, (3) increased marketing and accessibility of information about the agency; (4) analysis of internal processes and methods to improve operational systems and overall services to clients; and (5) Continuous Quality Improvement Activities.

The overall purpose of ORS, as reinforced by WIOA and the RI Governor’s Workforce Board (GWB) system-change initiatives, is to increase the competitive employment opportunities for individuals with disabilities through partnerships with and responsiveness to the needs of the business community. Efforts over the next several years will include continued collaboration with other state agencies to develop a coordinated approach to implementing a business needs and customer driven service delivery system, as described in the GWB’s Comprehensive System Improvement Plan (CSIP). This revised service-delivery system is to be based on the identified personnel needs of the business community and the identified training and job preparation needs of the ORS customer.

- ORS will enlist its partners to identify local businesses to develop targeted training programs to meet the specific needs of local business sectors.
- ORS will continue to participate on the Governors Workforce Board (GWB), Workforce Investment Boards (WIBs), WIOA Interagency Workgroup, and other advisory groups to gather current information about business sector needs and state responses. In addition, ORS continues to advocate for the Vocational Rehabilitation needs of individuals with disabilities as the state re-aligns its workforce development resources.
- ORS will explore with BHDDH and DLT the creation of regionalized job development collaboratives.
ORS will look at best practice models used in other states for blended and pooled funding.
ORS will build on current initiatives with DLT and GWB.
ORS will encourage WIOA partners to include an RFP requirement that targets individuals with disabilities. ORS will continue to grow its business partnership utilizing previous successful models with other area businesses.
ORS staff training focused on workforce development principles will enable Vocational Rehabilitation Counselors to use their knowledge and training about disabilities, functional limitations, and competitive employment to develop plans with clients that include not only acquisition of technical knowledge through training but also development of the work behaviors critical to employment success.
Increased use of vocational guidance and counseling, provided by ORS staff, will be essential to help clients prepare for the demands of employment. In addition, incorporating work experiences into employment plan development will increase the client’s ability to make informed choices about career selection and provide the ORS Counselor a feedback opportunity about work behaviors.
Participation in employment experiences for individuals needing Supported Employment, in-school youth, and clients attending college/training programs funded by ORS, will be encouraged and included in Individualized Plans for Employment (IPE).
ORS will also ensure that services are focused on access to opportunities for real work experiences and integrated competitive employment outcomes at or above minimum wage.
ORS will encourage and reinforce, with ORS approved Supported Employment providers and other state entities, Employment First and Recovery Principles and Practices into service delivery in order to increase expectations that individuals with significant intellectual and behavioral health disabilities can obtain quality employment outcomes in integrated settings at competitive wages.
ORS will provide access to information about SSA Work Incentives, Ticket to Work, and other State-specific benefits to customers and their families, CRPs, support staff, and ORS staff in order to support informed choice and employment decisions.
ORS will continue to update its web-page to ensure that information about the agency is current and relevant to the WIOA and state priorities around workforce development.
Links to partners and examples of partnerships will be helpful to market the services of ORS to potential clients, businesses, and other agencies. ORS will continue to expand communication through social media outlets, to include Facebook, Twitter, and YouTube, among others. In addition, orientation groups, literature distribution about the agency, presence at the America’s Job Centers (netWORKKri One-Stop Centers,) and participation in resource education events around the state will enhance referrals and visibility.
The ORS Continuous Quality Improvement (CQI) committee will continue to monitor the CQI plan to ensure a continuous QI system for monitoring, evaluating, and providing
timely information for staff and administration about the agency’s progress in meeting the goals outlined in the State plan. Monitoring via monthly reports to ORS Administration and staff about status of performance measures will occur.

- ORS will continue to elicit feedback from customers through satisfaction surveys and follow up through ongoing case reviews.
- ORS will continue to provide outreach to customers on waitlist.

The DOJ/State Consent Decree requires a CQI process and review be implemented to ensure quality services are provided to Supported Employment clients. ORS will continue to refine, pilot, and modify the process for CQI review of CRPs. The first line of reviews will be completed in early 2020, with the next round facilitated by BHDDH licensing and QI team, with ORS input. The DOJ Consent Decree CQI efforts continue to be a strong point of emphasis.

(2) How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.

ORS utilizes a broad range of assistive technology services, such as the ATAP Partners that are funded through State Grants for Assistive Technology, ORS Assistive Technology fee-for-services, and purchasing devices through approved vendors. Assistive Technology needs are person-centered and, on a case-by-case basis.

ORS utilizes the ATAP Partnership for demonstration, information and assistance, device reutilization, and device loan to explore if assistive technology would be appropriate for acquisition to assist individuals with disabilities in the rehabilitation process. Device Loan can also be utilized for vocational assessment, as well as the bridge from one device to acquiring another.

ORS has vendor-approved services through fee-for-services to provide detailed assistive technology services, such as assistive technology assessment, assistive technology installation and repair, assistive technology training, worksite assessment, and device acquisition.

ORS staff are expected to incorporate access to and acquisition of assistive technology, evaluations, assessment, and training as core services for adults, students, and youth with disabilities. The Deaf & Hard of Hearing unit and Services for the Blind and Visually Impaired (SBVI) unit are especially knowledgeable about assistive technology. Services for the Blind and Visually Impaired rehabilitation teachers review assistive technology needs of individuals with visual impairments or legal blindness. ORS also houses the ATEL program that operates an assistive technology lab for individuals who are Deaf or Hard of Hearing and/or have other speech and neurological impairments to have the opportunity to trial assistive technology equipment.

The provisions above continue to assist in making informed choices about equipment, and for using try-outs prior to making appropriate purchasing decisions. ORS has been mindful of working with individuals that are multi-layered in their needs for assistive technology and continues to work with both fee-for-service vendors and ATAP Partners in identifying the needs of individuals with disabilities.

(3) The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.
ORS monitors outcome ratios for minority populations in order to identify the current level of service, the need for expanded or new CRP services, and potential emerging minority populations. Review and analyze needs of minority and underserved populations, in order to develop capacity and expand CRP network ability to competently provide services that result in increased quality employment outcomes.

ORS ensures all agency materials, including those found on the ORS website and available for informational sessions, are provided in Spanish (or other languages), or alternate formats, as needed.

Establish new and innovative strategies to maintain ORS involvement with in-school youth with disabilities, adults, and youth who are no longer in school.

Staff attend in-service trainings on cultural sensitivity and competence, including instruction on use of interpreters; etc.

Formulate strategies to maintain communication and services with minority and underserved populations from application through service delivery to a quality employment outcome.

ORS identified needs of minority population and developed new bi-lingual services to include driving evaluations, occupational therapist training, and clinical/learning disabilities assessments.

(4) The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).

A Cooperative Agreement (CA) between RIDE and ORS, an RSA Best Practice, has been the foundation of a robust collaborative relationship focused on school-to-work transition for almost twenty years. Incorporated into the ORS Transition and Pre-ETS Program is an expectation that all students who are found eligible for services not subject to Order of Selection (OOS) will have an ORS-approved Individualized Plan for Employment (IPE) developed within 90 days of eligibility. Transition and Pre-ETS focuses on employment-related information and services to in-school youth with significant disabilities, including those students with an IEP or 504 plans. In addition, the State of Rhode Island is obligated to provide an array of transition services based on a Department of Justice (DOJ)/State Consent Decree/Interim Settlement Agreement to in-school youth identified as having a significant intellectual disability (I/DD).

Each high school has an identified ORS Vocational Rehabilitation Counselor as a liaison available to consult, provide technical assistance, review student progress, attend IEP meetings, and accept referrals. ORS contributes to this process through Vocational Rehabilitation Counselor attendance and/or consultation to the transition team meetings. A referral system is in place for students with disabilities, and each fall ORS, in collaboration with the Regional Educational Collaboratives and BHDDH, provides an orientation to Special Education staff at each Rhode Island High School. Transition and Pre-ETS services include: Counseling & Guidance, Job Explorations, and Assessments, Community-Based Work Experiences, Transition Academy participation, Summer Work, ORS/LEA Community Employment Projects. These services are provided based on the individualized needs of each student as identified by the team, family,
and student. Any work activities already completed by the LEA such as volunteer positions, work tryouts, and internships provide valuable information to the discussion and planning process. These activities are considered trial-work experiences by the DoJ, so are important to vocational planning.

Transition and Pre-ETS incorporates services for the DOJ/State Consent Decree identified youth with significant intellectual disabilities, as well as for all in-school youth potentially eligible for ORS. In addition, the DOJ/State Consent Decree requires each high school to develop Career Development Plans (CDP) with all in-school youth with I/DD beginning at age fourteen and reviewed annually. The team, including the student and family, determine the additional school/home/community experience needed to augment the employment exploration services already provided by the LEA. These ORS opportunities for in-school youth may include such services as: Job Explorations, and Assessments; Community-Based Work Experiences; Participation in Transition Academies; Summer Work Experiences for In-School youth (Employment Alliance - an extended school year paid work experience supported by ORS and an LEA as well as the four-week paid work experience funded by ORS to an ORS approved provider); Project Search, and a pilot of a summer internship program specifically designed for young adults in 2 year and 4 year degree programs. In 2018/2019, ORS developed a pilot to expand the provision of Pre-ETS to students in 10 middle schools, with hopes of expanding the pilot Statewide in 2020/2021.

(5) If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

The Assistant Administrator for Vendor Affairs/Workforce Development continues to hold regular meetings with Supported Employment, General, and Transition vendors to address concerns specific to their services and to reinforce their role within the Workforce Development community of RI. These meetings also provide an opportunity to clarify agency expectations, new service delivery ideas, and funding issues. Also, meetings are being scheduled with specific high-volume vendors and staff to address agency specific issues as they arise and to cultivate increased communication and partnership. Through his participation on the ORS Continuous Quality Improvement Team, the agency has developed a Quality Assurance program initially for Supported Employment providers. The Continuous Quality Improvement Committee works to develop increased options for individuals with disabilities who are considered underserved and/or minority populations based on the CNA findings. In addition, ongoing Quality Improvement activities such as the quarterly satisfaction survey are developed and implemented by the SRC State Plan and Continuous Quality Improvement Committee. These studies, organized by the ORS Strategic Planning Supervisor, provides ongoing information that is relevant to customers’ vocational rehabilitation needs and planning.

The Rhode Island Office of Rehabilitation Services (ORS) will continue to modify a fee-for-service structure with a wide network of private vocational rehabilitation providers in order to meet the vocational rehabilitation needs of Rhode Islanders with disabilities utilizing the information from the FFY 2017 Statewide Comprehensive Needs Assessment (CNA).
(6) Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

ORS is participating on the WIOA Interagency Workgroup. The Committee is examining methods to gather and track employment outcomes, educational, and skill advancement, as well as expenditures. ORS is working with the MIS system to be able to capture all required WIOA data elements and employment information to be reported quarterly on open and closed cases.

In addition, monthly monitoring of timeline requirements to determine eligibility and IPE development are in place. Each staff member has annual performance targets for the number of new applications, and successful employment outcomes. RSA had a monitoring visit with ORS in 2018, and ORS is awaiting the final report. ORS is still working to gather baseline performance information that will provide the basis for improvement strategies moving forward. ORS will continue to seek guidance from the RSA and WINTAC to establish WIOA performance measures.

(7) Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

ORS is in a unique position to assist other components of the Workforce Development system to provide services to individuals with disabilities. The ORS Assistant Administrator of Vendor Affairs/Workforce Development interacts with the business community, federal employment resources, National Employment Team (NET), Chamber of Commerce, Women’s Business Enterprise (WBE), and Minority Business Enterprise (MBE) trade organizations. The Department of Human Services (DHS) will be represented on each of the two existing Workforce Investment Boards (WIB) covering Providence/Cranston and Greater RI areas and their Youth Subcommittee. ORS staff review RFPs of Rhode Island’s two Workforce Investment Boards, Youth Councils, and Youth Centers; and advocates strategies for the inclusion of youth with disabilities in the Governor’s Workforce Investment initiatives.

ORS, through its parent agency, Rhode Island Department of Human Services, and as required by WIOA, is a financial and programmatic partner with Rhode Island America’s Job Centers (AJCs). ORS counselors have designated days and times at each of the One-Stop Centers in order to provide access to ORS services including applications, counseling, information and referral, and placement services. ORS personnel attend monthly statewide Employer Services Network meetings at the Providence/Cranston AJCs.

ORS personnel provide consultation and training to the AJC staff on disability issues, accessibility considerations, and assistive technology. ORS will provide AJC Staff with resources to support individuals with disabilities. Resources including the ATAP partnership and state independent living center are key supports in providing consultation and training to AJC Staff. ORS also works with other pertinent assistive technology professionals through fee for service and comparable benefits that may benefit the needs of AJC Staff.

ORS has two Memorandums of Understanding with the RI Workforce Investment Board that defines the relationship between ORS and the AJC Centers. In addition, ORS personnel are members of each of the two regional Workforce Investment Boards (WIB): Providence Cranston
Workforce Solutions and Greater Rhode Island Workforce Partnerships. Each WIB has a Youth Board that ORS personnel attend and participate in annual Request for Proposal reviews. ORS provides leadership and consultation to enhance the vendor community to becoming more integrated into the workforce development system. Providing case-specific consultation, as well as education about business practices, employment outcomes, and accountability, has become a focus of the dialogue between ORS and its approved vendors. IORS will define how ORS, Adult Education, and Department of Labor and Training will be collaborating on adult education and apprenticeship programs through technical assistance from RSA on this topic.

(8) How the agency's strategies will be used to:
   (A) achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

The goal and objectives outlined by ORS to increase competitive employment opportunities for ORS customers and to provide a flexible service-delivery system that prepares customers for employment align with the 2017 Comprehensive Needs Assessment (CNA). Information for strategic planning was gathered through 2017 CNA activities, meetings with the seven field services regions, and Quality Improvement Activities.
ORS will continue to assess information as it becomes available and to address the concerns raised in the RSA 107 Monitoring Report and Program Improvement Plan.
ORS will coordinate joint training opportunities for CRPs and ORS personnel, maximize ORS’ collaboration with the AJC Centers, Youth Centers, and business community, and promote CRP capability in the provision of a continuum of employment services.
ORS will encourage assessment activities and plan development that promotes informed choice, self-determination, and case movement toward integrated competitive employment, enhance Supported Employment services with emphasis in integrated and competitive goals, maintain a focus on quality employment outcomes (integrated, competitive employment at minimum wage or higher with benefits), emphasize outreach strategies that target underserved and unserved disability and minority populations, and address the needs of specific businesses and coordinate staff resources to work in collaboration with the SRC sub-committees as warranted example, QI/State Plan.

(B) support innovation and expansion activities;
ORS will utilize Innovation and Expansion (I & E) funds during FFY 2020 to support the activities of the SRC. The SRC and ORS will conduct a state-wide Comprehensive Needs Assessment, as required by RSA in FFY 2020. The results of this CNA will establish the Goals and Priorities for the Vocational Rehabilitation and Supported Employment services under WIOA. This CNA will incorporate existing reports from the Governor’s Workforce Board, the results of the Governor’s Commission on Disabilities, as well as DLT reports to frame and structure the CNA. ORS will utilize I&E funds to develop innovative training and placement services that are responsive to the needs and preferences of the business community and ORS clients. Expansion of such efforts as Project Search, business-based training, Chamber of Commerce events, Let’s
Get to Work Initiative, NCIS training, customized employment training, and OJT will be explored. Partnerships with DLT and other state agencies to develop a coordinated response that maximizes collaborative funding will be encouraged. ORS will use I&E funds to cultivate new CRPs and innovative service-delivery models to meet the diverse rehabilitation, support, training, and employment needs of underserved populations: minority populations, individuals with significant intellectual disabilities, TANF populations, individuals with Asperger’s and Autism, and individuals with sensory impairments.

ORS will increase the number of minority and underserved populations who participate in services and who obtain integrated competitive employment outcomes by cultivating CRPs to meet the needs identified in the CNA.
ORS will review and utilize the GWB Comprehensive System Improvement Plan (CSIP) to assess service delivery within the State and development of employment services for ORS customers. ORS will enlist the resources of interpreters, and ensure forms and information is accessible. Orientation groups are provided for potential applicants to attend and apply for services, this includes an orientation group monthly with Hispanic bilingual staff.
ORS maintains the ability to access information and the application for services on our website. Vocational Rehabilitation Counselors are assigned to schools and other community agencies as liaisons to facilitate access to ORS services.
ORS continues to identify needs of minority population and develop new bi-lingual services to include driving evaluations, occupational therapist training, and clinical/learning disabilities assessments.

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

The SRC is encouraged by the range of options ORS has identified to expand and improve employment services for individuals with disabilities. Increased business development, expansion of already successful initiatives and the potential of regional job development collaboratives are among the services identified for a revised service delivery system. Two goals are of increased concern for the SRC.
3. Outreach to identify and serve individuals with disabilities who are minorities, including those with significant disabilities.
While ORS has made efforts to improve services with this population by offering cultural sensitivity training for counselors and providing an array of agency materials in accessible formats and translation into other languages, the number of clients with disabilities coming from minority backgrounds remains a small fraction of those served agency-wide. ORS
continues to monitor the outcome ratios for minority populations served but has not regularly provided the SRC with outcome measures for outreach and aggressive identification of these populations to help remediate barriers to services. Identifying needs and formulating strategies is a good beginning, but actively setting benchmarks, and implementing interventions is urgently needed. We strongly recommend that ORS prioritize increasing services to minority and underserved populations during 2020 along with the increased development of bi-lingual services.

6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

The SRC strongly encourages ORS to implement quickly methods to gather and track employment outcomes, educational and skill advancement, and expenditures. We respectfully request regular updates on these data once the system has been put in place to collect and share these data.

2. The Designated State unit's response to the Council’s input and recommendations; and the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.

3. Outreach to identify and serve individuals with disabilities who are minorities, including those with significant disabilities.

ORS thanks the SRC for this suggestion and will provide regular updates/information about any business partnerships developed. Business engagement activities will be a key focal point for the agency for the upcoming year (maybe longer.) Any new initiatives focused on providing services to underserved individuals with disabilities identified as minorities will be part of the regular report to SRC.

6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

ORS would like to thank the SRC for the commentary and suggestion. With the new Common Performance Measures (CPM) dictated by WIOA still being determined, ORS will review the Section 116 requirements, and explore possible benchmarks to staff, and we will then provide the SRC the data collected as requested by the SRC.
(p) Evaluation and Reports of Progress: VR and Supported Employment Goals. Describe:

(1) An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:

(A) Identify the strategies that contributed to the achievement of the goals.

The State Plan for FFY 2018/PY 2017 and FFY 2019/PY 2018 incorporated tracking of admissions, service, and employment outcomes for general, transition, underserved, and supported employment customers covered under the Department of Justice (DOJ) Consent Decree (CD) in order to analyze these data elements. The use of this data was intended to modify, enhance, and/or develop new services and identify staff training needs.

Accomplishments:
Several new initiatives, fee-structure adjustments, Adult Project Search, Pre-ETS services expanded to ten (10) middle schools LEA’s, and expanded training programs had been developed in response to the data analysis, Comprehensive Needs Assessment (CNA), and feedback from customers, vendors, and staff.
ORS continues to utilize a monthly mechanism for alerting staff and supervisors about the status of admissions eligibility determination within 60 days and IPE Development within 90 days for Adult and Transition customers. Our move to a tighter OOS and eligibility process has caused some concerns about continuing to meet 60-day eligibility and 90-day plan development requirements. In our RSA monitoring visit, we were informed that ORS VR counselors should be utilizing extension waivers for IPE development as well as eligibility. ORS worked with the electronic case management system vendor to ensure that the IPE letters were available to staff.
Several of the other initiatives included: development and continuation of four Project Search sites in collaboration with four local businesses, Department of Behavioral Health, Developmental Disabilities, and Hospitals (BHDDH), Department of Labor and Training (DLT), and Local Education Authorities (LEAs); development of partnerships with local businesses to provide on-site training and resultant employment for ORS customers; and development of a summer work experience specific to the career goals of customers attending college. ORS expanded Business Engagement Outreach practices.
ORS also increased collaborative efforts with BHDDH and DLT (through the Governor’s Workforce Board) to develop training and employment programming for individuals with intellectual and developmental disabilities (IDD) to increase vocational opportunities to meet CD goals.
Starting November 1, 2018, ORS began releasing individuals from Wait List based on application date. ORS expanded CRP vendor services to minority/underserved population.
ACTUAL EMPLOYMENT OUTCOMES IN COMPETITIVE SETTINGS:
ORS reporting of employment outcomes had been done based on FFY. As of this State plan, ORS has made the transition to reporting outcomes based on PY to better align with WIOA performance measure and RSA-911 data reporting. Additionally, this shift has allowed the agency to place more of an emphasis on quality outcomes versus number of outcomes.

PY 2017
Successful Closures 559
Successful Transition Closures 82
Successful Minority and Underserved was 102
PY 2018
Successful Closures 425
Successful Transition Closures 95
Successful Minority and Underserved 147

(B) Describe the factors that impeded the achievement of the goals and priorities.

Obstacles for FFY 2018 and FFY 2019 for Title I, VR, include the focus on in-school youth and Pre-ETS service delivery, and adult mandates from DOJ Consent Decree, which has compromised the agency’s focus on other transition and adult populations. Also, a decrease in ORS’s request for re-allocation funds from RSA in 2017 resulted in moving to a tighter OOS eligibility process and closure of all categories. Several staff retirements at ORS have resulted in loss of knowledge with replacement staff having to learn while transitioning positions. Change in OOS categories and Wait List resulted in less fee-for-service funding and a decrease of vendor capacity. That decrease has resulted in an unstable staffing pattern at those agencies, which in turn created a decrease in service delivery of quality services.

(2) An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:

(A) Identify the strategies that contributed to the achievement of the goals.

The State Plan for FFY 2018 and FFY 2019 incorporated tracking of admissions, service, and employment outcomes for general, transition, underserved, and supported employment customers covered under the DOJ Consent Decree in order to analyze these data elements. The use of this data was intended to modify, enhance, and/or develop new services and identify staff training needs.

• ORS brought in an out-of-state vendor that specializes in developing relationships and trainings for area businesses in order to meet their specific work needs.
• ORS utilized current Project Search model/template for students to develop and implement an adult Project Search site, targeting individuals with IDD via a collaboration with BHDDH and DLT Real Jobs RI initiative. The site is RI Hospital, as part of the Lifespan
Network. The first cohort was successfully completed in June 2019, and a second cohort will commence in October 2019.

- ORS collaborated with BHDDH on a CVS Customer Service Training with several cohorts in progress.
- ORS continues to have a consistent presence on the Governors Workforce Board, WIOA Interagency Workgroup, and other advisory groups.
- ORS has an internal Employment Cadre consisting of VR Counselors, headed by the Assistant Administrator of Vendor Affairs/Workforce Development, to address employment and job development needs of the agency as a whole. In 2019, the Cadre made the decision to split into two subcommittees, one to address Business Engagement efforts, and one to address marketing VR services, especially to employers.
- ORS maintains a daily presence at the America’s Job Centers One-Stop, which provides the foundation for a cohesive service delivery system to ORS customers. ORS has identified staff liaisons to the various advisory groups. ORS is available to AJC staff for cross-training, consultation, and discussion about resources available to individuals with disabilities.
- The ORS Assistant Administrator of Vendor Affairs/Workforce Development disseminates job leads from businesses looking for applicants, and VR Staff also disseminate job leads and participant training opportunities from LinkedIn and Skills for RI.
- ORS Vocational Rehabilitation Counselors continue to collaborate and facilitate transition services for their assigned LEAs via Rhode Island College Transition Institute.
- Project Search expanded from three to four sites, with the continued goal to expand to five sites. ORS has a total of four sites presently, Miriam Hospital, Blue Cross Blue Shield RI, Newport Hospital (all transition,) and RI Hospital (adult). ORS continues to enlist Viability, a current ORS vendor, to develop an additional Business/ORS training-employer partnership and a pilot for Pre-ETS.
- ORS has and will continue to explore partnering with emerging high wage business sectors.

GOAL 1: TO INCREASE INTEGRATED COMPETITIVE EMPLOYMENT OPPORTUNITIES FOR ORS CUSTOMERS COMPARED TO TOTAL SUCCESSFUL EMPLOYMENT CLOSURES FROM PREVIOUS YEAR.

OBJECTIVE 1: Partner with two to three sector businesses to address personnel recruitment and training needs

OBJECTIVE 2: Utilize participation on Governors Workforce Board, Workforce Investment Boards, and other advisory groups to gather current information about business sector needs and state responses:

OBJECTIVE 3: Develop, implement, and replicate the successful business partnerships already operating:

- ORS has a VR Counselor assigned to every high school and developed and enhanced the Transition program and service options within each high school to coordinate and deliver Transition and Pre-Employment Transition Services (Pre-ETS) that provide work
experiences to youth. Fact sheets and FAQs pertaining to Pre-ETS were disseminated at Transition Nights, Individualized Employment Plan (IEP) meetings, Career Development Plan (CDP) meetings, and State Agency “Introduction to State Services” meeting with every high school.

- ORS completed a CNA in 2017 and identified trends and needs for Transition-Aged Youth and Adults, such as student and family awareness of the scope of services about the transition-to-adult services.
- In 2019, ORS began a fee-for-service pilot to introduce work exploration services at ten middle schools. This pilot was created to implement the services at year 1, train school staff in year 2, and fade out in year 3, targeting students with disabilities and tracking specific demographic information. ORS hopes to expand this State-wide in 2020 via same fee-for-service process.
- ORS ensured a wide array of service providers and training programs enabled customers to obtain meaningful, quality employment as rapidly as possible considering the occupational goal of the individual and the labor market.
- ORS completed a CNA in 2017 and identified trends and needs of Adults, and identified areas of need, such as services for individuals with Autism/Asperger’s to design programs and services.
- ORS created and developed two Asperger’s programs for soft skills and employment skills as a result of CNA.
- ORS developed and implemented a Continuous Quality Improvement process for vendors working with customers with Developmental Disabilities, as required by DOJ/State Consent Decree. ORS has evaluated twenty-two providers presently and will continue to collaborate with BHDDH to review one agency per month until first round is completed. ORS will collaborate with BHDDH on follow up CQI review after that first round is completed.
- ORS implemented training opportunities for SE vendors in assessment, task analysis, job development, job coaching, and customized employment.
- ORS has identified training needs for providers, as a result of CQI reviews, such as fading strategies and identifying employment goals.

**GOAL 2: TO PROVIDE A FLEXIBLE SE SERVICE DELIVERY SYSTEM THAT PREPARES CUSTOMERS FOR EMPLOYMENT AS EVIDENCED BY AN INCREASE IN COMPETITIVE EMPLOYMENT OUTCOMES FROM THE PREVIOUS YEAR.**

**OBJECTIVE 1:** Establish an array of services that have the flexibility to meet the unique rehabilitation needs of individuals with disabilities, engages unserved and underserved individuals, and moves customers into integrated competitive employment.

In-School Youth with Disabilities:

Adults with Disabilities:

**OBJECTIVE 2:** Change the culture of Supported Employment (SE) vendors to expect that integrated competitive employment is the goal from services.

- ORS will participate in a statewide collaboration with DLT, BHDDH, RIDE and Salve Regina University to hire more people with disabilities.
ORS continued to collaborate with BHDDH on regular meetings with SE vendors to reinforce and strengthen Employment First principles and practice.
ORS continued to support and participate in the SE Developmental Disability and SE Behavioral Health vendor meetings on a monthly basis to identify obstacles and training needs.
ORS continued to examine and modify, as needed, the VR fee structure to ensure it rewarded integrated employment outcomes.
ORS ended a pilot with seven Developmental Disability providers for a performance-based supported employment program with focus on employment and increased staff capacity. While the pilot resulted in a 25% successful employment rate, the CRPs did not increase staff capacity. The pilot competed with a similar performance-based funding program initiated by BHDDH: “Person Centered Supported Employment Program (PCSEP).”
ORS worked with WINTAC and BHDDH to implement a collaborative funding training to help DD agencies maximize SE funding from both agencies.
ORS began collaboration in January 2019 with several State Agencies, including with Governor’s Workforce Board (GWB), Department of Labor and Training (DLT), Behavior Health Developmental Disabilities and Hospitals (BHDDH) and Sherlock Center on Disabilities to coordinate and initiate a Statewide expansion of the culture of employment for persons with disabilities. (“Employment First”)
The State agencies held a public roll out in January 2019 to announce a comprehensive outreach marketing campaign to support “Employment First.”
Public forums were held to gather information from all sectors to identify specific area to focus energies on, as well as to involve people with disabilities (Advocates in Action and Cross Disability Coalition).
ORS has enlisted WINTAC TA to explore how best to implement the creation of regionalized job development collaboratives while bringing BHDDH and DLT to the table.
The model developed from Developmental Disabilities provider QI reviews can be replicated for reviews with other service providers.
As part of CQI reviews, ORS researched and evaluated specific services and correlation with employment outcomes. As part of reviews, ORS tracks the placements and services as part of the report which leads to a joint QI Plan with provider.
As part of the Consent Decree, ORS collaborated with other State Agencies, as part of the State Training Committee, focused on approving curricula for training to DD providers. This purpose for this training was to increase skill level and knowledge base of provider staff supporting individuals with disabilities.
OBJECTIVE 3: Ensure vendor competence for provision of vocational services and training programs that result in integrated competitive employment outcomes.

GOAL 3: DEVELOP DATA COLLECTION AND REPORTING METHODS THAT MEET THE COMMON WIOA PERFORMANCE MEASURES AND RSA STANDARDS OF PRACTICE AS EVIDENCED BY AGENCY ABILITY TO MEET REPORTING AND STATUS CHANGE EXPECTATIONS OF RSA.
OBJECTIVE 1: Meet WIOA performance accountability measures:
• ORS maintains a consistent presence on the WIOA Interagency Workgroup. Partners have focused on their readiness to capture the new WIOA requirements, therefore discussions have been ongoing among the WIOA partners in the state as to what data and how the data will be reported to state partners.
• ORS has been working with Libera on the agency electronic case management system to collect WIOA performance measures as defined by RSA in July 2017.
• ORS has held several large staff trainings focused on the WIOA reporting requirements. Supervisory training has been provided on the new requirements and entry into the ECM system, guidance documents have been developed, revised as needed and disseminated to staff. Training will continue to be provided to line staff and others as needs arise.
• ORS continues to utilize technical assistance opportunities provided through WINTAC and U.S. Department of Labor WorkforceGPS. ORS will benefit from ongoing technical assistance and guidance from WINTAC, WorkforceGPS, and RSA will be critical to ORS’s further understanding the establishment of the performance measure targets.
• ORS still tracks and monitors monthly the 60-day eligibility and 90-day to individualized plan for employment compliance. Regional Supervisors review this data with counselors to determine obstacles towards compliance.
• The DOJ/State Consent Decree with the state of RI created a state-wide commitment to Employment First principles in planning and service delivery for in-school youth and adult with significant intellectual disabilities. ORS has had a long-standing commitment to Integrated Competitive Employment for all individuals with disabilities. However, continued financial support by other state agencies of sheltered workshops impeded resources being re-directed to employment and long-term supports. The DOJ/State Consent Decree mandate forced a realignment of service delivery, funding, and collaboration among state agencies.
• ORS developed and implemented a pilot in 2017 with seven Developmental Disabilities providers for a performance-based supported employment program with focus on employment and increased staff capacity. The pilot ended in 2018 and though the successful employment rate was over 25%, the DD agencies that participated did not increase their staff capacity.
• ORS also developed two separate programs targeting persons with Asperger’s with an eye on employment and social skills development. The two programs began as pilots in 2017 and have moved onto regular service delivery menu. This model will be explored in East Bay region with hopes of piloting in 2019/2010.
• ORS also has expanded its Pre-ETS programming and service delivery, and created new innovative summer work experiences, work-based learning opportunities, and educated staff, schools, and families about options.
• ORS piloted a middle school Pre-ETS fee for service program with 10 LEAs in 2019, with hopes of expanding the programming State-wide in 2010.

OBJECTIVE 2: Meet RSA requirements for eligibility and plan development:
OBJECTIVE 3: Monitoring Wait List
• Provide weekly updates to Administration, BHDDH, and Executive Office of Health and Human Services (EOHSS) to identify Wait List number broken down by Category and Consent Decree population
• Provide Staff Training on assessment, eligibility determination, functional limitations, and priority categorization
• Maintain and update ORS website to report on number of individuals currently on Wait List
• Develop process for fiscal forecasting monitoring
• Identify other WIOA partners and resources for persons applying for services and placed on Wait List
• Continue to monitor Wait List on a quarterly basis

STATE PLAN FOR Title VI FFY 2018/PY 2017 and FFY 2019/PY 2018:
ACTUAL SUPPORTED EMPLOYMENT OUTCOMES IN COMPETITIVE SETTINGS:

PY17
Successful Supported Employment Closures - 133
Successful Supported Employment Closures Minority and Underserved - 29

PY18
Successful Supported Employment Closures - 107
Successful Supported Employment Closures Minority and Underserved - 16

(B) Describe the factors that impeded the achievement of the goals and priorities.

Both DD and Behavioral Health Providers are impeded by State budgetary constraints, and Medicaid service delivery. ORS collaborated with BHDDH and the provider network to build systems, and change models to meet goals and priorities. The focus on the unfunded mandates of the Consent Decree and the Pre-ETS transition population has created obstacles. ORS’ own budgetary constraints have led to a significant change in Order of Selection categorization, and moved more towards placement on Wait List.

STATE PLAN FOR SE Title VI FFY 2018 and FFY 2019:
Obstacles:

• The obstacles for Title VI program for FFY 2018 and FFY 2019 occur as the focus and resources of Supported Employment has been on individuals with significant intellectual disabilities, employment, and long-term supports for individuals with other behavioral health (BH) issues has seen a decrease in funding, CRP, and supported employment resources. As a consequence, ORS has struggled to provide SE services to individuals with behavioral health issues, as CRPs are not providing vocational services and long-term supports. Although the state agency responsible for BH services has created a new expectation of MH Centers to address employment issues, the infrastructure for these services will require time to re-build.
• Both DD and Behavioral Health Providers are impeded by State budgetary constraints, and Medicaid service delivery. ORS collaborated with BHDDH and the provider network to build systems and change models to meet goals and priorities.
• The focus on the unfunded mandates of the Consent Decree and the Pre-ETS transition population has created obstacles.
• ORS’ own budgetary constraints have led to a significant change in Order of Selection categorization and moved more towards placement on Wait List.

(3) The VR program’s performance on the performance accountability indicators under section 116 of WIOA.

The WIOA performance accountability indicators are a new requirement for ORS. The agency began tracking the performance accountability data elements via the Electronic Case Management system 7/1/17. ORS anticipates its data collection of WIOA performance accountability indicators to continue to evolve as the agency staff become more familiar with the data elements reported in the RSA911, RSA Dashboards, and ECM system. ORS has enlisted WINTAC to assist with TA in this area.

WIOA Performance Measures | PY17 and PY18
Employment Rate 2nd Quarter after Exit - PY17 = 263 PY18 = 635
Employment Rate 4th Quarter after Exit – PY17 = Not Available PY18 = 376
Median Earning in 2nd Quarter after Exit – PY17 = $3218.50 PY18 = $3358.39
Median Hourly Earnings at time of exit = PY17 - $10.25 PY18 - $11.00
Credential Attainment
Measurable Skills Gains PY17 – 23.8% per Statewide Performance Report Title IV VR
Effectiveness in Serving Employers Performance Measure 6 The State of RI chose to measure:
Retention with the same employer 2nd and 4th quarters after exit –
PY17 = Not Available PY18 = 257

Employer Penetration Rate – ORS provides a PY report to DLT the lead State WIOA partner.
Employer Service
Employer Information and Support Services PY17 = 3 PY18 = 4
Accessing Untapped Labor Pools PY17 = 6 PY18 = 6
Training Services, including OJT Py17 = 3 PY18 = 1

Other
Median Hours per week at time of exit - PY 17 = 24 PY18 = 24
Median Hours per week at time of exit for Supported Employment - PY 17 – 16 PY18 – 15
Median Wage per week at time of exit for Supported Employment – PY17 - $10.00 PY 18 - $10.30
Equal Access to Services: Utilizing the historic Performance Indicator 2.1 of a standard of .80% ORS exceeded the rate with .94% in FFY 2017, .90 in FFY 2018.

In FFY 2018 there were 1069 new applications for services; 283 IPE’s developed and 464 employment outcomes. Additionally, 657 individuals were made eligible and placed on the Wait List and 177 youth non applicant entered PRE-ETS services.
In FFY 2019 there were 589 new applications for services; 134 IPE’s developed and 323 employment outcomes. 500 individuals were determined eligible and added to the wait list and 445 youth non applicant entered PRE-ETS services.

Evaluation Standard 2 - Equal Access to Services:

Equal Access to Services: Utilizing the historic Performance Indicator 2.1 of a standard of .80% ORS exceeded the rate with .94% in FFY 2017, .90 in FFY 2018

(4) How the funds reserved for innovation and expansion (I&E) activities were utilized.

ORS used I & E funds to support the Adult Project Search program. ORS utilized I & E funds to support the contract with the Paul V. Sherlock Center on Disabilities.

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

The SRC notes that ORS continues to create innovative opportunities and collaborative partnerships to meet VR and Supported Employment goals. However, in spite of these initiatives, successful Supported Employment closures dropped from 464 to 323 from 2018 to 2019. The 2019 number is almost 30% less in employment outcomes. Some of this difference is due to limited availability of funds and the expansion of the OOS in 2018 and most of 2019. At the same time, ORS’s measure of equal access to services exceeded the standard rate of 80% at 90% for FFY 2018. Given the number of initiatives and collaborative programming, the SRC strongly encourages ORS to implement outcome measures for vendors to ensure that services that are being provided are receiving appropriate funding levels and are achieving employment outcomes for individuals served.

Thank you for the opportunity to comment on the up-date to the two-year VR portion of the Combined State Plan. We are encouraged by the changes ORS has implement based on needs assessments over the past two years. We look forward to a continuing collaboration to ensure that all RI residents with disabilities will have equal access to employment services and jobs of their choosing in settings of their choice.

2. The Designated State unit’s response to the Council’s input and recommendations; and the designated State unit’s explanations for rejecting any of the Council’s input or recommendations.
ORS would like to thank the SRC for this commentary and suggestions. ORS agrees with the points made previously and concur that the provider agencies on both the DD and Behavioral Health side will require some collaborative efforts from WIOA and State Agency partners to increase capacity to serve all individuals with disabilities. ORS will be collaborating a great deal with the WIOA partners, DLT, and State Agencies on the “Let’s Get to Work” initiative, to address this issue and look to possible solutions that will increase CRP/Vendor staff capacities, and services to all individuals with disabilities. As previously stated, the two GWBs are being merged and a plan is in development for one board. ORS will actively work with the other WIOA partners and report on progress made over this next year. Again, ORS would like to thank the State Rehabilitation Council for your input.

**(q) Quality, Scope, and Extent of Supported Employment Services.** Include the following:

1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.

OVERVIEW OF SUPPORTED EMPLOYMENT SERVICES:
The Rhode Island Office of Rehabilitation Services (ORS) continues to provide Supported Employment services, requirements of WIOA, RSA, and the RI Department of Justice/State Consent Decree (DOJ/CD), as a means to enable individuals with the most significant disabilities to have access to the supports needed to participate in integrated competitive employment opportunities. ORS has maintained involvement with two Supported Employment (SE) Advisory Councils for Developmental Disabilities and Behavioral Health, representation on the Developmental Disabilities (DD) Council, and the RI Transition Council. ORS participates on multiple committees, task groups, and in various arenas to discuss employment expectations with customers, providers, and families. ORS is committed to providing and improving Supported Employment services to ORS customers. For those customers who meet the supported employment criteria, the Individualized Plan for Employment (IPE) becomes the foundation for meeting customers’ individualized supported employment needs. The IPE defines the employment goal, the timeline, services, and long-term support/vendor who will continue to provide support services to the individual with disability on a long-term basis. These long-term support providers are identified in a signed agreement of understanding, which is signed by the vendor agency and ORS.
SUPPORTED EMPLOYMENT SERVICE DELIVERY:
ORS has employment services that are available to adults, youth, and students with disabilities found eligible for Supported Employment Services. The values and principles of ORS to make integrated competitive employment available to all individuals with disabilities has been reinforced by a state of RI DOJ/State Consent Decree. The Consent Decree (CD) and Interim Settlement Agreement (ISA), between RI and DOJ, resulted in a Governor’s proclamation declaring that RI is an Employment First state. The principles and practices of Employment First, consistent with the mission of ORS and the mandate of the Rehabilitation Service Administration (RSA), are utilized in planning and service delivery to adults, in-school youth, and out-of-school youth.
The DOJ/State Consent Decree requires three state agencies: (1) Office of Rehabilitation Services (ORS), (2) the Rhode Island Department of Education (RIDE) and (3) the Behavioral Health, Developmental Disabilities and Hospitals (BHDDH) to develop and implement a service-delivery system that ensures individuals, adults and youth, have access to the services and supports that lead to integrated competitive employment opportunities as the first and desired outcome of state funded services. Provider staff resources were therefore unavailable to support integrated competitive employment efforts for adults, youth, and students with significant behavioral health and developmental disabilities. ORS and BHDDH, two of the parties of the DOJ/State Consent Decree are mandated to create a state-wide Supported Employment service-delivery system that ensures adults and youth with I/DD are afforded full access to Supported Employment services and long-term supports to maintain employment. There has been a significant increase in collaboration among the State Agencies and the provider network on how best to develop this systems’ change.
The three state entities continue to utilize a Transition timeline for staff, families, and school personnel to clarify each agency’s obligations to implement the DOJ/State Consent Decree requirements for in-school youths’ access to employment exploration and work experiences. An annual “Introduction to State Services” meeting with each high school, continues to be held. ORS recently extended a Cooperative Agreement with RIDE and is in process of working on a new one. ORS has maintained a very robust presence at each high school in the state to assist with and provide transition-related services for over 17 years. The ORS Rehabilitation Counselor functions as a liaison, consultant, and referral source to the transition personnel of each high school in the state. ORS has been providing a wide array of transition services since the inception of the Cooperative Agreement to in-school youth with disabilities, including youth with I/DD. The array of Transition Services and Pre-Employment Transition Services (Pre-ETS) services for in-school youth with disabilities include: Job Explorations and Assessments; Community-Based Work Experiences, participation in Transition Academies and ORS/LEA Summer Employment experiences, Summer Work, Project Search, and other Pre-ETS transition and work activities. The array of ORS transition services in place for both students and youth with disabilities and those youth eligible for Supported Employment services meet the requirements of WIOA and the DOJ/State Consent Decree.
SUPPORTED EMPLOYMENT AGENCY NETWORK:
ORS has a long-standing history of collaboration with the RI agency responsible for services to individuals with developmental disabilities - Behavioral Health, Developmental Disabilities and Hospitals (BHDDH). ORS funds an array of Supported Employment services for adults and youth with developmental disabilities and behavioral health issues through a fee-for-service arrangement with a network of ORS-approved Community Rehabilitation Providers (CRP). Many of these Supported Employment (SE) CRPs are also licensed by BHDDH to provide residential, case management, and support services to individuals with developmental and behavioral disabilities.
ORS has a referral, liaison, and consultative relationship with the CRPs. ORS funds a continuum of Supported Employment services through the customer selected CRP. The objective of the SE services is an integrated competitive employment outcome. ORS, as a leader, trainer, and funding source of supported employment services, engages CRPs who also rely on BHDDH funding to provide the long-term supports that help sustain employment. Long-term supports are planned for and included in the customer’s ORS Individualized Plan for Employment (IPE). These plans are individualized and define the scope and specific Supported Employment service. WIOA/RSA funding for SE services is limited by several considerations: (1) to individuals with disabilities found eligible for SE Services and a limitation of extended services to 24 months for adults and 48 months for youth with disabilities. The IPE also identifies the CRP that is accepting responsibility for long-term and intermittent support services to the individual with a disability. The time frame for transitioning a customer from the support services of both ORS and the CRP to the extended supports provided solely by the CRP is based on the time restrictions of ORS (as per RSA) and the individual needs of each customer. ORS has been working with CRPs who provide Supported Employment services to improve the quality and availability of employment-related services.
Due to the complexities of implementation of the DOJ/State Consent Decree, ORS attends a quarterly meeting with all of the I/DD Supported Employment CRP. Those meetings focus on service delivery, a target of 20 hours/week as an expectation of employment goal and offer support and guidance to the providers.
ORS took the lead to ensure that staff have the expertise appropriate for the vocational services being provided to individuals with disabilities. ORS has been working with the Sherlock Center for Disabilities and VocWorks in order to identify, develop, plan, and execute training for employees of ORS-approved provider networks. Attending to the training needs of CRPs is an ongoing commitment. The Assistant Administrators for CRPs and Supported Employment actively meet with providers/vendors who provide Supported Employment (SE) services in order to re-enforce the philosophy of Employment First. The two Assistant Administrators, in collaboration with field supervisors, counselors, and ORS administrators, are actively involved in meetings with potential vendors to discuss becoming a Supported Employment vendor for ORS in order to increase service delivery capacity. These meetings with CRPs provide an opportunity to address concerns and questions as well as clarify the elements of a quality employment outcome. ORS participates on the two Supported Employment Advisory Councils as a means of dedicating resources and reinforcing a commitment to integrated competitive employment for individuals with significant disabilities.
ORS will continue to encourage CRPs to collaborate with each other, through regular meetings sponsored by either BHDDH or ORS, to meet the diverse employment needs of significantly disabled individuals with intellectual and behavioral health issues. This collaboration is also encouraged at individual and joint meetings of the BHDDH, Divisions of DD and BH Supported Employment Councils. Some ORS customers not eligible for the long-term supports provided by DD or BH agencies have significant functional limitations and could benefit from the supports and job coaching expertise of SE agencies, with an overall goal of increasing integrated, competitive employment outcomes. SE customers have increased the average number of hours employed, however, ORS is continuing to work with staff and vendors on improving the quality of the jobs, salary, and benefits for its’ supported employment population. The fee for service model continues to be updated and modified to cover needs of the SE customer.

(2) The timing of transition to extended services.

ORS, as a partner and funding source of Supported Employment services, engages CRPs to provide the extended supports that help sustain employment for individuals with significant disabilities. Long-term supports, generally funded by Behavioral Health, Developmental Disability and Hospitals (BHDDH), are planned for and included in the ORS customers’ Individualized Plan for Employment (IPE). The IPE is based on the needs of the customer and define the scope, specific services, and duration of ORS-funded SE services. ORS, according to RSA and WIOA, limits extended SE funding to 24 months for adults and 48 months for youth with disabilities age 14-24 with the most significant disabilities. The IPE also identifies that the CRP that accepts responsibility for providing the long-term and intermittent support services, funded by BHDDH, in order to maintain employment. This shift in service-delivery responsibility is well coordinated by the ORS counselor and vendor agency staff, so that there will be a seamless and continuous delivery of job retention services to the individual. The transitioning of a customer from the support services provided by both ORS and the CRP to the extended supports provided solely by the CRP is defined by RSA.
VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAM

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. 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.

CAREER AND TECHNICAL EDUCATION PROGRAMS AUTHORIZED UNDER PERKINS V

While the Carl D. Perkins Career and Technical Education program is a partner program to this plan, their requirements for public comment and review are handled separately from this document. Individuals interested in reviewing the draft Perkins Career and Technical Education plan for the state should visit: https://www.ride.ri.gov/StudentsFamilies/EducationPrograms/CareerTechnicalEducation.aspx
TEMPORARY ASSISTANCE FOR NEEDY FAMILIES PROGRAM (TANF)

States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:

(a) Conduct a program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program, specifically cash assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act).

The Rhode Island Department of Human Services (DHS) is the state agency responsible for administration of the federal Temporary Assistance for Needy Families (TANF) Block Grant. DHS is also responsible for implementation of the Rhode Island Works Act of 2008. Together, these federal and state programs provide essential services for low-income families throughout the State to assist them in meeting their basic family needs while at the same time providing parents with a range of work supports to help them prepare for and access the job market.

In accord with the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), the State of Rhode Island has developed its TANF State Plan based upon the four major purposes of TANF, which are to:

- Provide assistance to needy families so that children may be cared for in his or her own home or in the home of a relative;
- End dependence of needy parents on government benefits by promoting job preparation, work, and marriage;
- Prevent and reduce the incidence of out of wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and
- Encourage the formation and maintenance of two-parent families

Rhode Island Works Program

The RI General Assembly revised the state TANF law in June 2008 (RIGL 40-5.2 et seq.). Entitled The Rhode Island Works Program, it was designed to help low income families toward independence while at the same time improving the State’s efforts to achieve the required TANF Work Participation Rates. Since 2008, the General Assembly has made two clarifying adjustments to the law. In June 2010 it clarified and affirmed that any RI Works’ approvable activity could follow from the assessment of RI Works participants. This was broadening, as the original iteration of the RI Works Program required that almost all RI Works participants be required to Job Search as the first activity of the employment plan. In 2019 the RI General Assembly removed the 24-month time limit and amended the law so that on or after January 1, 2020, no cash assistance shall be provided to a family or assistance unit that includes an adult member who has received cash assistance for a total of forty-eight (48) months, whether or not consecutive; unless that family has applied and been approved for a hardship.
Most significant among the changes were: new time limits on receipt of cash assistance, new work activities consistent with TANF requirements, full engagement of families in activities leading to economic independence from public assistance, including appropriate and realistic employment plans for individuals with disabilities. Additionally, DHS collaborates with the WIOA partners including a collaboration with the Governor’s Workforce Board and RI Department of Labor and Training which coordinates with the One-Stop Career Centers, also known as American Job Centers.

Eligibility for RI Works/TANF Program:

A “family” is defined for the RI Works/TANF cash assistance program as (a) a pregnant woman from and including the seventh month of her pregnancy; and/or (b) a child and the following eligible persons living in the same household as the child: (A) each biological, adoptive or stepparent of the child, or in the absence of a parent, any adult relative who is responsible, in fact, for the care of such child, and (B) the child’s minor siblings, whether of whole or half-blood: provided, however, that the term “family” shall not include any person receiving benefits under title XVI of the Social Security Act, 42 U.S.C. 1381 et seq. A family may be the same as the Assistance Unit.

A low-income family includes a child under the age of 18, or 19 if a full-time student, and family income is 225% of the federal poverty level or below.

An eligible family must meet age, relationship, citizenship/alienage, residency, and cooperation requirements, as well as remain within the income and resource limits of the program. As long as single parents and two (2) parent families meet income and resource limits of the program and are otherwise eligible, they qualify for cash assistance, child care, supplemental nutrition assistance program, and health care coverage.

Eligibility is limited to families whose available resources reduced by any obligations or debts with respect to such resources, total less than one thousand dollars ($1,000). Eligibility is denied or terminated if the value of non-exempt resources exceeds the one-thousand-dollar limit. With regards to vehicle ownership, the State has chosen to exclude as a resource one (1) vehicle for each adult household member, not to exceed two (2) vehicles per household.

To determine eligibility for cash assistance, the total of a family’s countable earned income, after an earned income disregard of the first $170/month and one half the remainder of earnings, and unearned income is compared with the appropriate assistance payment standard for the unit. The payment standard is equal to the sum of the following:

- For the first person: three hundred twenty-seven dollars ($327) or two hundred seventy-seven dollars ($277) for a family residing in subsidized housing;
- For the second person: one hundred twenty-two dollars ($122)
- For the third person: one hundred five dollars ($105), and
For each additional person: eighty dollars ($80) for each additional person.

Cooperation with the child support enforcement agency is required as a condition of eligibility for cash assistance.

To continue to be counted as a family member for the purpose of cash assistance, a child is allowed temporary absences from the home for no more than ninety (90) days per episode, with a second ninety (90) day renewal authorized only through supervisory approval. The program requires minor parents to live with a parent, relative, or in a supervised setting and remain in school, unless otherwise authorized by the Department for specific good cause reasons and the minor resides in an approved supervised supportive living arrangement.

Rhode Island Works Program Time Limit: The Rhode Island Works law (RIGL 40-5.2) provides cash assistance for a maximum total of forty-eight (48) months on cash assistance regardless of whether consecutive or not.

Time limit begin with the first issuance of cash assistance. An applicant is required to sign an Employment Plan as a condition of eligibility for cash assistance. Some recipients are exempted from immediate work activities such as parents who are waived under the Domestic Violence Waiver process. Time limit apply to families in which citizen children receive assistance although their non-citizen parents do not.

Exceptions to time limit applies in the instances of: (1) a minor child(ren) living with a single parent who receives SSI benefits, or with two-parents who both receive SSI benefits; and (2) a minor child(ren) living with a legally responsible non-parent caretaker relative who is not in the cash assistance payment.

Hardship Extension to Time Limit: Any individual approaching the time limit is notified that they may request a reassessment to determine whether or not they meet the criteria for an extension to time limit. Additionally, any parent who has met or exceeded the time limit may reapply and be assessed to determine if they meet any of the criteria for an extension beyond the time limit.

A parent who is undocumented, who has received benefits for their citizen child(ren), may request a hardship extension for the child(ren) at the time limit. A parent who does not meet the alienage requirements required for eligibility for cash assistance under federal PRWORA (e.g., those Legal Permanent Resident families in which the parent has been in the United States less than five (5) years), who has received benefits for her/his citizen child(ren), may also request a hardship extension for the child(ren).

A hardship extension may be granted to all otherwise eligible families who meet at least one of the following criteria:
• has a documented significant physical or mental incapacity and can verify/document a pending application for SSI or SSDI and has submitted an application for or is active and making progress in her/his Employment Plan with the Office of Rehabilitation Services (ORS); or
• is caring for a significantly disabled family member who resides in the home and requires full time care; or
• is homeless—meaning a lack of a fixed and regular nighttime residence or a primary nighttime residence, such as a supervised shelter, a halfway house, a temporary residence, a temporary accommodation (e.g., hotel/motel), a residence of another for not more than ninety days, or a place not designed for regular sleeping accommodations (e.g., bus station);
• is unable to pursue employment because of a current, documented domestic violence situation; or
• is unable to work because of a critical other condition or circumstance, other than citizenship or alienage status.

For TANF program purposes, families extended beyond sixty (60) months of TANF cash assistance under the categories listed above will be included in the federally-funded twenty percent (20%) hardship exceptions.

(b) Require a parent or caretaker receiving assistance to engage in work (defined by the State) once the State determines the parent or caretaker is ready to engage in work, or once he or she has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2) (section 402(a)(1)(A)(ii) of the Social Security Act).

1) Work Requirements and Participation Requirements under RI Works Program
   All parents and caretaker relatives, including those who are acting in loco parentis, if they are included in the cash assistance grant, who request and receive assistance are required to enter into an employment plan and participate, unless temporarily exempt, in DHS-approved work-related activities.

2) One Parent Family
   Single parents shall participate for a minimum of twenty (20) hours per week for parents whose youngest child in the home is under the age of six (6), and for a minimum of thirty (30) hours per week for parents whose youngest child in the home is six (6) years of age or older, in one or more of the following work activities, as appropriate, in order to help the parent obtain stable full-time paid employment. For teen parents, the first activity must be secondary education or completion of a GED program, if either certificate has not yet been obtained.

Core Activity Opportunities for One Parent Families:
• Unsubsidized employment;
• Subsidized private sector employment;
• Subsidized public sector employment;
• Work experience. A parent participating in a work experience or community service program for the maximum number of hours per week allowable by the Fair Labor Standards Act (FLSA) will be considered to have met their required twenty (20) core hours if actual participation falls short of the required minimum hours per week (RI has a mini-simplified Food Stamp waiver). For parents whose youngest child is six (6) or more years old and whose required minimum hours per week are thirty (30), any hours permissible by FLSA that are short of thirty (30) hours must be satisfied in some other TANF work activity;
• On-the-job training;
• Job search and job readiness. Except in the context of supportive service employment plans, job search and job readiness activities are limited to 4 consecutive weeks, or for a total of 6 weeks in a twelve-month period. The DHS shall extend job search and job readiness assistance for up to twelve (12) weeks in a fiscal year if RI has an unemployment rate at least fifty percent (50%) greater than the United States federal unemployment rate, or if the state meets the definition of a needy state under the contingency fund provisions of federal law;
• Community Service;
• Vocational educational training not to exceed twelve (12) months. Participation in a two-year degree program, a vocational certificate program, or a BA degree or advanced degree program may count as vocational educational training. Those participants who are in programs longer than twelve (12) months may use this activity as counting toward participation in a non-core job skills training, if they meet the requirement for a different core activity for sufficient hours.

All supervised homework plus up to one hour of unsupervised homework per each hour of class time may count as meeting part of the total hours required for compliance with the RI Works employment plan. However, total homework time cannot exceed the hours required or advised in writing by the educational program;
  • Adult education in an intensive work readiness program;
  • Child care for an individual participating in a community service program.

Non-core Activity Opportunities for One Parent Families:
• Job skills training directly related to employment, allowable in addition to participation for twenty (20) hours per week in one of the above core activities;
• Education directly related to employment, allowable in addition to participation for twenty (20) hours per week in one of the above core activities;
• Satisfactory attendance at a secondary school or in a course of study leading to a GED. In the case of a parent under the age of 20, such satisfactory attendance in secondary school or in a GED program is countable as a core activity.
Other Required Work Activity Opportunities for One Parent Families:

- Up to ten (10) hours of activities as defined in a DCYF service plan may substitute for meeting an equivalent number of hours toward the twenty (20) hour requirement for parents with a child under age six (6), or for an equivalent number of hours toward the thirty (30) hour requirement for parents whose youngest child is age six (6) or older. The DCYF Social Caseworker II and/or vendor provides the actual number of hours of participation per week required in order for the parent to comply with their service plan. The DHS worker then makes these hours part of the total hours required for compliance with the RI Works employment plan.

Temporary Exemption for Single Parents

Work requirements outlined above shall not apply to a single parent if, and for so long as, the Department finds that they are:

- Caring for a child below the age of one, provided that a parent may opt for deferral for a maximum of twelve (12) months during any 48 month period of eligibility for cash assistance, but noting that a minor parent without a high school diploma or the equivalent, shall not be exempt for more than twelve (12) weeks from the birth of the child;
- Caring for a child or family member with a significant documented disability who resides in the home and requires full-time care;
- A recipient of SSI or RSDI/SSDI or other disability benefit that has the same standards of disability as defined by the Social Security Administration;
- An RIW applicant or recipient who has completed an application for SSI or SSDI who has been determined by a designated DHS vendor to be likely to become eligible for SSI or SSDI;
- An individual receiving assistance who is a victim of domestic violence;
- An applicant for assistance in her third trimester of pregnancy or a pregnant woman in her third trimester who is a recipient of assistance and who has medical documentation that she cannot work.

3) Two Parent Family Requirements

In families consisting of two parents, one parent is required and shall be engaged in work activities as defined below, for at least thirty-five (35) hours per week during the month, not fewer than thirty (30) hours per week of which are attributable to one or more of the following listed work activities. Two parent work requirements shall be defined as follows:

Core Activity Opportunities for Two-Parent Families:
- Unsubsidized employment;
- Subsidized private sector employment;
- Subsidized public sector employment;
- Work experience;
- On-the-job training;
- Job search and job readiness. Except in the context of supportive service employment plans, job search and job readiness activities are limited to 4 consecutive weeks, or for a total of 6 weeks in a twelve-month period. The DHS shall extend job search and job readiness assistance for up to twelve (12) weeks in a fiscal year if RI has an unemployment rate at least fifty percent (50%) greater than the United States federal unemployment rate, or if the state meets the definition of a needy state under the contingency fund provisions of federal law;
- Community Service program;
- Vocational educational training not to exceed twelve (12) months;
- The provision of child care services to a participant individual who is participating in a community service program;
- Adult education in an intensive work readiness program.

Above thirty (30) hours per week, the following three (3) activities may also count for participation:

Non-Core Activity Opportunities for Two-Parent Families:

- Job skills training directly related to employment;
- Education directly related to employment; and
- Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence. Satisfactory attendance in secondary school or in a GED program is countable as a core activity in the case of a parent who is married and is under twenty (20) years old.

Other Required Work Activities for Two-Parent Families:

- Up to ten (10) hours of activities as defined in a DCYF service plan may substitute for meeting an equivalent number of hours toward the thirty-five (35) hour requirement. The DCYF Social Caseworker II and/or vendor provides the actual number of hours of participation per week required in order for the parent to comply with their service plan. The DHS worker then makes these hours part of the total hours required for compliance with the RI Works employment plan.
- Housing search, if the family is homeless (or about to become homeless), may be approved for the second parent in a two-parent family, if the first parent is participating in a core activity at least thirty (30) hours per week. This activity may be approved for the first parent, if the second parent receives SSI/RSDI/SSDI. Housing search is classified as job readiness, which is a core activity.
In a two-parent family in which one (1) parent is engaged for at least thirty-five (35) hours per week in the work activities specified above, the other, second, parent may also participate in and have an assessment completed. The second parent must then sign an employment plan.

A family with two parents, whether or not receiving child care, in which one or both parents participate in a work experience or community service program for the maximum number of hours per week allowable by the Fair Labor Standards Act (FLSA) will be considered to have met their required thirty (30) core hours if actual participation falls short of the required minimum hours per week. For families that need additional hours beyond the core activity requirement, these hours must be satisfied in some other TANF work activity.

Except in the instance of a work experience or community service program which must meet the requirements of the FLSA as described above, if the family receives child care assistance and an adult in the family is not disabled or caring for a severely disabled child, then the work-eligible individuals must be participating in work activities for an average of at least fifty-five (55) hours per week to count as a two-parent family engaged in work for the month. At least fifty (50) of the fifty-five (55) hours per week must come from participation in the activities listed in the Core Activities above. Above fifty (50) hours per week, the three (3) activities listed in Non-Core Activities above may also count as participation.

Teen Two-Parent Family Requirements

In a two-parent household in which both parents are under age twenty (20), the DHS worker should assess the educational history of both parents. For either parent who has not completed high school or obtained a GED, as a first activity in the RI Works program, the screening DHS worker should approve and enter an employment plan for that parent; or for both parents if neither have the high school diploma or GED; that shows full time attendance in secondary education or completion of a GED program as the first activity. When both have either reached the age of twenty (20) or completed the first activity of education as described above, all two parent family rules will come into full force and effect.

Exemptions for Two-Parent Families

The work requirements shall not apply if, and for so long as, the Department finds that:

- both parents receive Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI); or
- both parents have completed applications for SSI or SSDI and both have been determined by a designated DHS vendor to be likely to become eligible for SSI or SSDI; or
- one parent is caring for a child or family member with a significant documented disability who resides in the home, and who requires full time care and the other parent receives SSI/RSDI/SSDI and is medically documented to be unable to provide care for the disabled family member.
(c) Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act). Consistent with the required strategic elements discussed in section II (a)(2) herein, provide a specific analysis of how the State’s workforce development activities are addressing employment and training services for parents or caretakers receiving assistance.

Non-Compliance with Work Requirements

All parents and caretaker relatives not specifically exempted are required to participate in appropriate work activities. Failure to do so may result in a penalty, if good cause is not provided for the non-participation. Current policy states: During the first three (3) months of noncompliance with work requirements, the amount of cash assistance to which an otherwise eligible family is entitled shall be reduced by the portion of the family's benefit attributable to any parent who, without good cause, has failed to enter into an individual employment plan or has failed to comply with his or her individual employment plan; provided that the reduction shall be applied during the first three (3) months, whether or not consecutive, of such failure or non-compliance by the parent.

For a family size of two (2), the benefit reduction due to noncompliance with the employment plan shall be computed utilizing a family size of three (3), in which the parent's portion equals one hundred five dollars ($105).

After three (3) months of noncompliance, the Department shall terminate cash assistance to a family if any parent in the family has failed, without good cause, to enter into an individual employment plan, or to comply with his or her individual employment plan and has been penalized for three (3) months, whether or not consecutive.

The penalty becomes effective on the next payroll date after the adverse action period. The participant is notified of the penalty by a system-generated notice.

If the family's benefit has been reduced for less than three (3) months, whether or not consecutive, due to the parent's failure to enter into an individual employment plan or failure to comply with the terms of his or her individual employment plan, benefits shall be restored to the full amount beginning with the initial payment made on the first of the month following the month in which the parent (1) enters into an individual employment plan and demonstrates compliance with the terms thereof, or (2) demonstrates compliance with the terms of his or her existing individual employment plan, as such plan may be amended by agreement of the parent and the Department.

If the family's benefit has been terminated due to the failure by one or more parents to enter into an individual employment plan or failure to comply with the terms of his or her individual employment plan and has been penalized for three (3) months, the family may re-apply for benefits and benefits shall be restored to the family in the full amount the family is otherwise
entitled to under this chapter beginning on the first of the month following the month in which all parents in the family who are subject to the employment plan requirements (1) enter into an individual employment plan and demonstrate compliance with the terms thereof, or (2) demonstrate compliance with the terms of his or her existing individual employment plan, as such plan may be amended by agreement of the parent and the Department, i.e., the parent must sign a new Employment Plan, demonstrate compliance with the Plan for at least two (2) weeks, and continue to participate, for the penalty to be considered cured and the case accepted beginning with the first of the month following the month that she or he began to comply.

(d) Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act).

In accordance with the General Laws of Rhode Island 40-6-12 all records pertaining to the administration of public assistance are declared to constitute confidential matter. It is unlawful for any person to make use of, or cause to be used, any information contained in these records for purposes not directly connected with program administration, except with the consent of the individual concerned. Any person violating any provisions of this state law, or the lawful rules and regulations made there under will be deemed guilty of a misdemeanor and fined not less than two hundred dollars ($200) or will be imprisoned for not more than six (6) months or both.

(e) Establish goals and take action to prevent and reduce out-of-wedlock pregnancies, with special emphasis on teenage pregnancies (section 402(a)(1)(A)(v) of the Social Security Act).

(A) Rhode Island’s Comprehensive Statewide Teen Pregnancy Prevention Plan

DHS had an active role in a formal partnership called the Rhode Island Alliance to Prevent Teen Pregnancy with the RI Department of Health (RIDOH), Department of Education, the Department for Children, Youth and Families, and several community-based organizations, which was originally formed to address the complex issues of teenage pregnancy and to develop Rhode Island’s Comprehensive Statewide Teen Pregnancy Prevention Plan. The Plan, which was completed in June 1999 and revised in 2004, was based on research findings, results of community forums, and professional expertise in teenage pregnancy prevention. The Plan contained information on federal and state funding sources, programs that educate at-risk teens, programs that provide pregnancy prevention education, a review of current literature pertaining to this topic, state level initiatives and financial resources for teach training.

The prevention plan was the basis for the collaboration between DHS and RIDOH for the Youth Success program, now called Teen and Family Development (TFD). TFD has been a collaborative effort with both RIDOH and DHS vendors meeting regularly to ensure that both TFD and Medical eligible youth are being educated about the programs in both DHS and RIDOH. A cross
referral for these programs ensures that young parents are aware of programs and able to access RI Works. Additionally, RI Works vendors are conducting pregnancy prevention outreach as well as intensive services for “at risk” youth.

RI also contracts with the Rhode Island Alliance of Boys and Girls Clubs to provide teen services across the State. These contracts have a targeted focus of supporting efforts to prevent teen pregnancy and serve pregnant and parenting teens. Provide pregnancy prevention, career development, financial and academic support, and leadership skills programming to RI youth. In 2017, RI will be procuring new Youth Support vendors, these vendors are required to develop a teen pregnancy prevention work plan.

(B) Youth Responsibility and the Adolescent Self-Sufficiency Collaborative became the Teen and Family Prevention

Since April 1, 2009, the Department began contracting with an association of nine (9) community-based organizations to provide an intervention program for at-risk and pregnant/parenting populations, initially called the Youth Success (YS) Program. All contracted organizations had either their own educational (GED) program or access to each other’s programs, should a teen not remain in high school, which is the primary educational goal. Academic instruction focused on a high school diploma or its equivalent, pregnancy prevention education, skills development, service learning, and career exploration/work experience. This program was reorganized and renamed in March of 2018, now known as Teen and Family Development (TFD). The TFD program provided case management services, ensures health and dental care needs are met, improves teen character development and increases life skills, especially academic and parenting skills. Substance abuse services, domestic abuse/trauma services, mental health services and coordination with the Office of Child Support Services are all present in-house in these nine-member agencies.

The Family Needs Assessment used by TFD is in compliance with the ACF’s Teen Parent Responsibility Plan. As partner agencies may also operate Early Head Start, Head Start and licensed child care centers, participating youth receive priority for Head Start and child care services when appropriate. Further, as three of these agencies are regional leads in the Family Care Community Partnership (FCCP) operated by RI’s Department of Children, Youth and Families, outreach is coordinated with the FCCP to reduce instances of teen pregnancy. An example of this Department’s partnership with the FCCP and with the RI Department of Health (RIDOH) is the joint effort to add resources to the Nurse-Family Partnership Program and other Family Visiting Programs by RIDOH. Using strategies scientifically proven effective to reduce initial and repeat pregnancy, the TFD works with teens, individually or in groups, in schools, in community sites, and/or in the teens’ own homes. The TFD also tracks, monitors, and reports to DHS each pregnant and parenting teen’s school attendance and works to resolve issues of non-compliance with DHS requirements, such as attending school.

Minor parents are required to live at home with their parents, with a relative, or a legal guardian in order to be eligible for cash assistance through the RI Works Program. Unless
otherwise authorized, the cash assistance is issued to the parent, relative, or the legal guardian on behalf of the minor parent. When there is good cause for a minor parent to live outside the allowable living arrangements above, and there is no suitable relative or legal guardian, the minor parent must live in an adult-supervised supportive living arrangement which ensures regular adult supervision and which requires the minor parent to participate in secondary education and the TFD program.

As of March 2018, Youth Success was renamed to Teen and Family Development (TFD). TFD is now part of the performance-based contracts for vendors overseeing RI Works activities. Two prime vendors are contracted for TFD. The principles and standards for YS are largely the same for TFD. Both vendors are working cooperatively with the RIDOH, to continue a close partnership with the Nurse Family Partnership and other home visiting programs. Joint meetings are held between RIDOH, DHS, and all vendors to ensure coordinated services for this population.

(C) New Opportunity Homes

New Opportunity Homes (NOH) is a key component of DHS’s teen and young adult programs. The New Opportunity Homes are supervised living arrangements which offer an alternative option for pregnant and parenting RI Works Program applicants/recipients who are unable to remain at home with their own parents or guardians. New Opportunity Homes provide young adults with a positive environment that is safe and nurturing. A multi-disciplinary team reviews prospective residents to determine the appropriateness of a NOH, using screening criteria and assessments to assure that participant’s needs may be met by a NOH. Moreover, each resident is assigned a case manager. Together, the NOH and the case management agency offer each resident educational supports and opportunities to develop social and life skills, including parenting skills, necessary to become positive parents and self-sufficient, productive adults.

(f) Conduct a program designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded to include men (section 402(a)(1)(A)(vi) of the Social Security Act.)

Statutory Rape
Rhode Island’s Comprehensive Statewide Teen Pregnancy Prevention Plan has recommended that “Rhode Island should clarify, communicate, enforce and strengthen existing statutory rape and child molestation laws.” A collaborative effort has therefore developed between each TFD, and the DHS funded Domestic Violence Prevention program which provides education and training on the problems of statutory rape and child molestation to state and local law enforcement officials, educators, and adolescent counselors, all of whom are required to notify the RI Department of Children, Youth and Families when sexual abuse of a child is suspected. Further, the TFD Program has been expanded to outreach and expects to enroll 100% pregnant and parenting teens and a minimum of 330 males and 300 females who are considered at-risk.
youth. The TFD Program will outreach to fathers in an effort not only to establish paternity and child support, but to encourage them to maintain an emotional relationship with their child.

(g) Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance (section 402(a)(1)(A)(vii) of the Social Security Act).

Electronic Benefits Transfer (EBT)

The term ‘electronic benefit transfer transaction’ means the use of a credit or debit card service, automated teller machine, point-of-sale terminal, or access to an online system for the withdrawal of funds or the processing of a payment for merchandise or a service. Payment of RI Works Program cash benefits through an electronic benefit transfer (EBT) system is authorized by RIGL 40-5.2-31. Cash benefits are credited to an EBT account in the recipient's name on the first and sixteenth of the month including weekends and holidays.

Recipients, and authorized payees, access EBT cash benefits by using a plastic Rhode Island EBT card and their personal identification number (PIN). The RI EBT system provides access to cash benefits at bank, credit union, and retail store automated teller machines (ATMs). Some retail establishments also provide access to cash accounts at point-of-sale (POS) terminals which display the QUEST logo. This service is called a cash back transaction and policies on its availability and limits on the amount of cash dispensed are set by the individual store.

Each month, recipients can make a total of two (2) free cash withdrawals from ATMs. For each additional ATM cash withdrawal in the month, a fee of 85 cents is charged. The fee is automatically deducted from the recipient's cash benefit account. No fee is charged when cash benefits are accessed at POS terminals.

RI EBT cards are issued in all RI Works district offices using special card printing and PIN selection machines. Cardholders must report lost, stolen, or damaged RI EBT cards to the Customer Service Help Line at 1-888-979-9939. A Customer Service Representative invalidates the card thereby protecting the unused benefit amounts. If someone uses the card before its status has been changed, the benefits cannot be replaced. No fee is charged for the replacement of any lost, stolen, or damaged RI EBT card. Cardholders may request a new card by contacting the local DHS office and completing a DHS EBT-10, EBT Replacement Form. Replacement RI EBT cards are mailed by noon the next business day after the authorization file has been successfully transmitted.
EBT Restrictions
Pursuant to Section 4004 of Public Law 112-96, it is prohibited for a TANF recipient to use their TANF cash assistance benefits received under RI Works, Rhode Island General Laws 40-5.2 et seq., in any electronic benefit transfer transaction (EBT) in:

- any liquor store;
- any casino, gambling casino, or gaming establishment; or
- any retail establishment which provides adult-oriented entertainment in which performers disrobe or perform in an unclothed state for entertainment.

DEFINITIONS- For purposes of above:

LIQUOR STORE- The term ‘liquor store’ means any retail establishment which sells exclusively or primarily intoxicating liquor. Such term does not include a grocery store which sells both intoxicating liquor and groceries including staple foods (within the meaning of section 3(r) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(r))).

CASINO, GAMBLING CASINO, OR GAMING ESTABLISHMENT- The terms ‘casino’, ‘gambling casino’, and ‘gaming establishment’ do not include:

- a grocery store which sells groceries including such staple foods and which also offers, or is located within the same building or complex as, casino, gambling, or gaming activities; or
- any other establishment that offers casino, gambling, or gaming activities incidental to the principal purpose of the business.

It is illegal to withdraw TANF benefits from an ATM located in one of the prohibited locations, or to use TANF benefits at a point of sale (POS) terminal located in a prohibited location. Rhode Island will compile a report of the EBT restricted transaction quarterly. Any person receiving cash assistance through the RI Works program who uses an EBT card in violation shall be subject to the following penalties:

- For the first violation, the household will be sent a warning that a prohibited transaction occurred;
- For the second violation, the household will be charged a penalty in the amount of the EBT transaction that occurred at the prohibited location;
- For the third and all subsequent violations, the household will be charged a penalty in the amount of the EBT transaction that occurred at the prohibited location AND for the month following the month of infraction, the amount of cash assistance to which an otherwise eligible recipient family is entitled shall be reduced by the portion of the family’s benefit attributable to any parent who utilized the EBT card in a restricted location. For a family size of two (2), the benefit reduction due to noncompliance with use of EBT at a restricted location shall be computed utilizing a family size of three (3), in which the parent’s portion equals one hundred five dollars ($105).
If an individual believes that the intended action regarding usage of EBT cash at restricted locations is incorrect, they may request a hearing before the Executive Office of Human Services Hearing Officer within thirty (30) days of the mailing of the notice of adverse action. The individual may request that benefits be continued pending the outcome of the hearing if the request is made within ten (10) days of the mailing of the notice.

(h) Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act).

FEES AND SURCHARGES FOR EBT TRANSACTIONS

EBT Brochure

The following verbiage is on the EBT usage brochure provided to RI Works clients and available at all DHS field offices:

There is never a transaction fee for using your Cash Benefits to get cash at a POS machine. At ATMS, after your second cash withdrawal in a month, an 85-cent transaction fee is automatically taken out of your Cash account each time you withdraw cash. A surcharge is an additional fee that can be charged by the owner of an ATM or POS for using that machine. Surcharges will be taken from your account automatically. If you do not want to pay the surcharge, cancel the transaction and go to another ATM or POS location that does not charge a surcharge.

DHS Website

In addition, the RI Works policy, including EBT information on fees and surcharges is located on the DHS website at:

(i) Indicate whether it intends to treat families moving from another State differently from other families under the program, and if so how (section 402(a)(1)(B)(i) of the Social Security Act)

The State of Rhode Island does not intend to treat families moving into the state differently than established residents.
(j) Indicate whether it intends to provide assistance to non-citizens, and if so include an overview of the assistance (section 402(a)(1)(B)(ii) of the Social Security Act)

The RI Works Program has adopted the provisions in section 402 (b) of PRWORA with regard to legal non-citizens. This requirement to comply with PRWORA will remain in effect according to all applicable changes made to the federal law, as that Act may hereafter be amended. Legal non-citizens must meet income and resource criteria including their sponsor’s income and resources. Such individuals will be eligible for cash assistance at the same levels and under the same rules as citizens. In order to be eligible, the non-citizen must be:

- A qualified non-citizen who entered the U.S. prior to 8/22/96; or
- A qualified non-citizen who entered the country on or after 8/22/96 and is exempt from the five (5) year ban as defined below; or
- After the five (5) year ban, a qualified non-citizen who entered the U.S. on or after 8/22/96.

Qualified non-citizens who are exempt from the five (5) year ban include:

- Refugees, under section 207 of the Immigration and Nationality Act (INA);
- Asylees, under section 208 of the INA;
- Amerasian entrants as defined under section 584 of the Foreign Operations, Export Financing and Related Programs Appropriations Act of 1988;
- Cuban or Haitian entrants under section 501 (e) of the Refugee Education Assistance Act of 1980;
- Lawfully residing honorably-discharged veterans (except one discharged for reasons of immigration status), and the non-remarried widow or widower of the veteran;
- Non-citizens on active duty in the U.S. Armed Forces, their lawfully residing spouses and unmarried dependent children;
- Battered victims with a petition pending under 204 (a) (1) (A) or (B), or 244 (a) (3) of the INA; or
- Victims of human trafficking in accordance with section 107 (b) of the Victims of Trafficking and Violence Protection Act of 2000.

Qualified non-citizens who entered the U.S. on or after 8/22/96, who are subject to the five (5) year ban include:

- Lawful permanent residents (LPR)
- Parolees for at least one (1) year under 212 (d) (5) of the INA
- Conditional entrants under 203 (a) (7) of immigration law in effect before 4/1/80
- Certain American Indians born outside the U.S.

A person who is not a United States citizen and does not meet the alienage requirements established in PRWORA, as amended, is not eligible for cash assistance. Those applicants who are ineligible include undocumented and/or illegal immigrants and persons documented as temporary visitors.
(k) Set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how it will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process (section 402(a)(1)(B)(iii) of the Social Security Act).

Rhode Island provides an objective process for the delivery of benefits and the determination of eligibility, for fair and equitable treatment, and for complaints and an appeals process for those recipients that have been adversely affected. Specific details pertaining to the policy and procedures are contained in Rhode Island DHS Manual Sections Civil Rights Compliance and Complaints and Hearings.

Furthermore, a parent or caretaker who requests assistance for a child shall meet with an agency representative as soon as possible and no later than five (5) days from the date of request for assistance. The application for assistance shall be accepted or denied by the Department no later than thirty (30) days following the date of application.

A family found by the Department to meet the eligibility criteria shall be entitled to receive cash assistance from the date of submitting a signed application. The family members shall be eligible for cash assistance for so long as they continue to meet the eligibility criteria and parents shall be eligible so long as they meet the terms and conditions of the work requirements.

Any applicant or recipient aggrieved because of a decision by the Department, including but not limited to, a decision regarding eligibility for benefits, the amount of benefits, terms of an Employment Plan or a delay in making a decision with respect to an application for assistance shall be entitled to an appeal. The Department shall provide an applicant with written notice of a decision to deny benefits and shall provide recipients written notice at least ten (10) days in advance of a decision to terminate or reduce benefits to the family. Notices shall be in easy to understand language and shall explain the reason for the Department's decision and cite the relevant section of the Department's regulations. The family may appeal the decision by filing a written request with the Department within thirty (30) days of the date the notice was mailed. If the recipient files the request within ten (10) days of the date the notice was mailed, the recipient may receive benefits without reduction pending the outcome of the appeal. Hearings with respect to public assistance shall be conducted by the Department.
(l) Indicate whether the State intends to assist individuals to train for, seek, and maintain employment (Section 402(a)(1)(B)(v) of the Social Security Act)—

(1) providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or

(2) in other occupations related to elder care, high-demand occupations, or occupations expected to experience labor shortages as, determined appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.

The Patient Protection and Affordable Care Act of 2010 added a provision to the Social Security Act requiring each state to indicate its intention to assist individuals in training for, seeking and maintaining employment in the eldercare workforce. Rhode Island notes its status as one of the most elder-populated states (proportionately) in the country, and has been proactive historically in ensuring our TANF recipients are prepared to work effectively in this field which serves 16.8% of the state’s population (2017 census). The current national average is that the elderly represents 15.6% of the US population, and this proportion will increase both nationally and in Rhode Island, per the Administration on Aging. It is predicted that, in 2030, elderly persons will be 19.7% of the national population, and 21.4% of Rhode Island’s population.

Vocational trainings, which the Department supports for TANF recipients who choose them, in the areas of Healthcare Exploration, Homemaker, Certified Nursing Assistant and Medical Assistant are provided by multiple agencies in Rhode Island. These agencies have incorporated much material devoted to preparation for work with the elderly.

(m) Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Services encourages it) ($\text{§263.2(b)(3)}$ & $\text{§263.2(c)}$ preamble pages 17826-7).

The State of Rhode Island expends funds to administer and support a range of benefits and services to assist low income needy children and families. For purposes of Rhode Island’s TANF State Plan, the definition of low-income needy family means a family which includes a dependent child(ren) under age 18, or 19 if full-time student, and a parent/caretaker relative with a gross household income level which is at or below 225% of the Federal Poverty Level (FPL). While it is recognized that income and resource limits may differ somewhat from program to program, in order to receive benefits or services through programs described in this section of the R. I. TANF State Plan, a family must meet this state’s definition of low income.
The following outlines benefits and services which are funded as either a separate State Program and meets one or more of the four purposes of TANF and thus qualify as state maintenance of effort (MOE) expenditures, claimable under TANF regulations.

(A) Separate State Programs:

- Child Care Assistance for both cash assistance and non-cash low income working families – Child care subsidies are provided to active RI Works parents engaged in work activities and for all low income working families engaged in employment for 20 or more hours per week, as well as low income youth enrolled with the Teen and Family Development program who are completing their high school diploma or GED with employment plans for at least 20 hours/week. Current eligibility criteria for non-cash assistance parents who meet the income criteria are outlined in Rhode Island’s Child Care and Development Fund (CCDF) State Plan. Child Care Assistance ends dependence of needy families on government benefits by promoting job preparation and supporting working families. Consistent with TANF Purpose 2.

- State funded Head Start Services for low-income children who are not able to be served through federally funded Head Start Programs - State-funded head start is a means tested program and accepts only those families who are determined low income needy as defined above. Children between 3 and 4 years of age benefit by school readiness programs and parent involvement which is required by all families and these parents gain information about adult education, job skills training and work opportunities, thus improving their ability to become economically independent. Consistent with TANF Purposes 1, 2, 3, 4.

- Emergency Assistance and residential services for vulnerable youth, through the RI Department of Children, Youth and Families - Emergency Assistance (EA) as allowed under prior law supports the maintenance of services for those families who would have qualified for EA under the prior program as described in Rhode Island’s State Plan in 1995. Services are provided to children who are victims of abuse and/or neglect, or at risk of abuse and neglect. EA is used for TANF MOE only to the extent that State-only dollars are expended to support the range of family intervention, counseling and case management services provided. State-funded residential services through DCYF, for those with active reunification plans, also provide a safe temporary environment for children as families seek stability. In such circumstances, children may be absent from the home for more than 180 days so long as reunification plans are maintained. These expenditures are not matched with any other federal or non-federal funding source. Consistent with TANF Purposes 1 and 3.

- Child Support Pass-through payments to children - The state pass-through of eligible payments to children of non-custodial parents increases the family’s income and supports the likelihood that the custodial parent’s household income will increase, by both regular child support payments and with the TANF work program, their ability to prepare for and enter the job market. Consistent with TANF Purpose 2.
• Rental Assistance Payments through the State Community Action Fund - Rental assistance may be provided through CAP agencies using state-only dollars. Low income families qualify if they can demonstrate an ability to maintain themselves in the home or apartment and have a short-term need for special assistance. The rental assistance payment may not exceed the State’s maximum payment which cannot exceed $600 per month for a maximum of 2 months. Consistent with TANF Purposes 1 and 4.
• State funded low income heating assistance - Low income families may receive state funded heating assistance during the year. This is administered by the RI Community Action Programs. Consistent with TANF Purposes 1 and 4.
• State funded Supportive Housing and Development Services for low income families administered through Office of Housing and Community Development and Rhode Island Housing - The State of Rhode Island supports housing for low income families who need help in transitioning to permanent housing, who may be working toward qualifying for the purchase of affordable housing, or who need emergency intervention to prevent the loss of otherwise stable housing. Stable housing is a core need of families who are trying to prepare for or maintain themselves in a job. Consistent with TANF Purposes 1, 2, and 4.
• Governor’s Workforce Board job training and education for disadvantaged youth and adults – The RI Governor’s Workforce Board (GWB) has funded a significant number of programs throughout Rhode Island which are designed to provide low income youth and adults with job training and access to employment resources. Services include job finding skills and for many in Rhode Island, skill upgrading programs. Both youth and adults are either unemployed or underemployed and are held to a means tested application process. Some programs are geared to meet the special needs of young parents, for both custodial and non-custodial parents. Consistent with TANF Purposes 1, 2, 3, and 4.
• State funded Adult Literacy Services - Rhode Island has adult education programs through the Rhode Island Department of Education (RIDE). RIDE has worked very closely with the TANF Program to create contextualized learning opportunities for low income parents who are not academically eligible for much post-secondary programming. Consistent with TANF Purposes 1, 2, 3 and 4.
• Youth exiting the foster care system - Intervention and Treatment Services administered by RI Department of Children Youth and Families are essential services which help vulnerable youth to move into productive life skill/management programs. Services provided to youth are designed to ensure that they avoid early pregnancy, graduate high school, follow appropriate healthy living habits, and have access to responsible and supportive adults either within their respective families or through mentorships provided by programs paid for with state-only dollars. Consistent with TANF Purposes 3, and 4
• Under the category known as short-term, non-recurrent benefit programs, funds may emanate from state general revenue, charitable organizations, non-profit, or local government resources. Programs may include a benefit to a custodial parent in lieu of child support, a one-time benefit to those who qualify for Rhode Island’s Earned Income
Tax Credit or to any low-income family, including those receiving some form of public support, and one-time benefits may take any form, including but not limited to, food, restoration of utilities or avoidance of utility shut-offs, appliance replacement to enable food storage or meal preparation, auto repairs, or other basic necessities - Consistent with TANF Purposes 1 and 2.

- State-funded higher education grants to low-income youth helps families prepare older youth for careers - Consistent with TANF Purposes 2 and 3.

Systems for tracking and managing funding streams, beneficiary education, training, work activities, and other child and families support programs are in place as well as data reporting to meet requirements outlined in Final TANF Regulations. Administrative costs for technology would also be claimable as MOE under the State’s TANF Program.

(B) Non-Assistance

The state supports several other MOE-funded services for low-income needy families including, but not limited to, recurring short-term benefits, as noted below.

- Short-term Cash Assistance or Benefit Programs - Under RI Works Program, the state may implement a short term (not more than 4 consecutive months) cash payment or benefit program for qualifying applicants for cash assistance and low-income families. The state may also provide non-recurrent, short-term benefits to low income families while TANF Emergency Contingency Funds, or its successor legislation, is available to these families.
- State Earned Income Tax Credit - The Rhode Island State Earned Income Tax Credit (SEITC) has both a non-refundable as well as a refundable tax credit which is based upon twenty-five (25%) percent of the federal Earned Income Tax Credit. Consistent with RIGL. 44-20-2.6 (d) and 44-30-98, Article 30, Rhode Island taxpayers filing for State EITC who meet both financial eligibility criteria as defined by federal tax law to claim EITC, and who have at least one (1) dependent child in their family, will receive a refundable amount equal to up to twenty-five (25%) percent of the federal EITC. The Rhode Island General Assembly may legislatively adjust, from time to time, the percentage of the federal rate used by this State, to determine the State EITC amount refunded to low income working families.
- Disaster Relief - The State of Rhode Island provides short-term non-recurring benefits to victims who have been affected by Hurricanes and other officially declared disasters from time to time.
- Property Tax Relief for Income Eligible Home Owners and Renters - The State of Rhode Island provides property tax relief in the form of tax refunds to individuals 65 and older, disabled individuals as well as non-disabled/non-elderly individuals and families who meet income eligibility requirements and who file for such tax refunds. Consistent with RIGL. 44-33, the refundable tax credit is based upon the amount that property taxes or rent constituting property taxes exceeds the amount of the low-income thresholds.
established in law and for purposes of TANF MOE, the State would only claim expenditures paid to low income families.

- Community-Based Work, Training, Housing, Food Assistance, Emergency Needs, and Family Support and Development Programs for low income parents and children funded through state and local non-profit funding streams such as: The Annie E. Casey Foundation, the Rhode Island Foundation, the United Way of Rhode Island, which collectively support a wide range of employment and training, shelter, food assistance, emergency needs and community development initiatives targeted to improve outcomes for youth and families in the areas of economic self-sufficiency. Only non-matched qualifying funds and services may be claimed toward Rhode Island’s TANF MOE, including, but not limited to third-party and charitable contributions supporting the RI Community Food Bank’s distribution of food to low income Rhode Island families. Other non-profit agencies that contribute to TANF MOE include: The Roam Catholic Diocese of Providence, the Rhode Island Alliance of Boys and Girls Clubs, and the Salvation Army of Providence.

- State-funded Programs for Youth and Families administered through the Community Action Network. Programs and services funded through the RI Community Action Network assist children and families throughout the state. These state funded programs and services meet at least one or more of the four purposes of TANF and include but are not limited to youth development, state funded nutrition programs, energy, early childhood programs, housing services programs.

- State funded legislative grants to community based special programs and services. The State legislature funds a wide range of programs and services which benefit the needs of families, children and the community. Family intervention services, truancy intervention, substance abuse counseling, transportation, youth mentoring, parenting, and other types of special programs are delivered to at-risk youth, children, and/or parents. These services meet at least one of the four purposes of TANF.

- Adult Literacy and Job Training Development funded by the Governor’s Workforce Board. State funded programs which target youth as well as custodial parents and non-custodial parents are provided throughout the state for those who need basic education, GED, and job skills in order to compete in the Rhode Island job market. Such programs improve the economic well-being of youth and families by assisting both unemployed, under-employed individuals, some of whom may be transitioning from youth training school or adult correctional institution and need re-entry services. These programs are administered through the RI Department of Labor and Training, RI Department of Corrections, as well as the RI Department of Education. These goals are consistent with all four purposes of TANF and thus meet the requirements for TANF-MOE.

- State funded Supplemental Security Income (SSI). In accord with DHS Policy Section 0402.10, Standards of Assistance, SSI State Supplements paid to children and parents receiving Supplemental Security Income. These payments augment the federally funded SSI payments and assist families who are typically unable to improve their household resources because they are either unable to work themselves or must remain in the home to care for a disabled child(ren).
• RI Works Vendors - RI Works has contracted with vendors who are responsible for delivering services, managing work activities, reporting hours, and notifying DHS of required sanctions or closures. All contracts are performance based and critical for the success of the RI Works program. Vendors braid funding from a multitude of sources and are asked to contribute to TANF-MOE when applicable.

TRADE ADJUSTMENT ASSISTANCE
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.

Please see elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.
JOBS FOR VETERANS STATE GRANTS

The Jobs for Veterans’ State Grants (JVSG) are mandatory, formula-based staffing grants to States (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported quarterly on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

(a) How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;

NetworkRI Career Centers offer specialized services to eligible veterans and/or persons under the Jobs for Veterans State Grant Program. Each NetworkRI Career Center has a Disabled Veterans’ Outreach Program Specialist (DVOP) to render intensive services to eligible veterans and/or persons with one or more Significant Barriers to Employment (SBE) as identified by the Secretary of Labor. DVOP Specialists will conduct a comprehensive assessment of education, skills, and abilities of each referred veteran. This will include the development of the Individual Employment Plan (IEP) that identifies employment goals, interim objectives, and appropriate services that will enable the veterans to meet their employment goals.

If training has been identified in the Individual Employment Plan DVP Specialists will make an appropriate referral to a suitable training program including but not limited to the following:

1. Occupational skills training
2. On-the-Job training
3. Job readiness training
4. Adult Education and Literacy
5. Employer Customized training

In addition, DVOPs will continue to provide intensive services, in combination with follow-up activities. DVOP specialists will monitor veteran’s progress throughout training.

When a veteran is determined job ready and/or completes training, DVOP Specialist will collaborate with Local Veterans Employment Representatives (LVER) and AJC staff for information about veteran employment opportunities. JVSG Staff will provide all veterans and eligible persons with sufficient opportunities for job placement through the following services;

1. Referrals to local, state, and federal job opportunities
2. Training on “veteran-only” online employment resources
3. Referrals to employers who are interested in hiring veterans
4. Referrals to local federal defense contractors
5. Facilitating networking workshops that promote the benefits of hiring veterans; and
6. Promoting job fairs for veterans
LVER staff will conduct follow-up activities with employers to ensure veterans and eligible persons are successful throughout the hiring process.

(b) The duties assigned to DVOP specialists and LVER staff by the State; specifically implementing DVOP and LVER duties or roles and responsibilities as outlined in 38 U.S.C. § 4103A and 4104. These duties must be consistent with current guidance;

**Disabled Veterans Outreach Program (DVOP) Specialists**

As an integral part of the State’s Labor Exchange System the DVOP staff’s primary focus is to meet the needs of veterans and eligible persons that have one or more (SBE). As outlined, under 38 U.S.C. 4103 (a), DVOP Specialists will provide intensive services and facilitate job placements to meet the employment needs of veterans, prioritizing service to special disabled veterans, other disabled veterans, and other categories of veterans in accordance with priorities determined by the Secretary of Labor.

DVOP staff will only service veterans with Significant Barriers to Employment (SBE), and other veterans and eligible persons as defined by the Secretary of Labor. Veterans requiring intensive services will be assigned to a DVOP Specialist after receiving an initial intake assessment conducted by the identified AJC staff member or when referred by another agency that has determined an SBE is present.

The DVOP Specialist will conduct a comprehensive assessment of education, skills, and abilities of each referred veteran. This will include the development of the Individual Employment Plan (IEP) that identifies employment goals, interim objectives, and appropriate services that will enable the veteran to meet his or her employment goals. All activities, services and case notes and appropriate data are entered by the DVOP Specialist into the state’s case management information system and virtual one-stop for monitoring and reporting purposes.

In order to maximize services to those eligible veterans and eligible persons, DVOP staff conducts outreach activities at a variety of sites including, but not limited to:

1. Vocational rehabilitation and employment programs
2. Homeless Veterans Reintegration Program (HVRP) grantees
3. Department of Veterans Affairs Medical Center and Vets Center
4. Homeless shelters
5. Community Stand Down Events
6. State vocational rehabilitation agencies

**Local Veterans’ Employment Representatives (LVER)**

As an integral part of the state labor exchange system the LVER staff will focus on the primary role of employer outreach on behalf of the job ready veterans as outlined in 38 U.S.C 4104 (b)

The principal duties of a LVER are:

- Conduct outreach to employers in the area to assist veterans in gaining employment, including conducting seminars for employers and, in conjunction with employers, conducting job search workshops and establishing job search groups; and
- Facilitate employment, training, and placement services furnished to veterans in a State under the applicable State employment service delivery systems.
In the effort to promote the hiring and retention of eligible veterans and eligible persons the LVER staff perform outreach to local employers, small and large. To facilitate and promote the hiring of veterans LVERs establish a rapport with each employer by making employer site visits and following up with them via phone and email. This rapport and follow-up allow the LVER to remind the employers of the benefits of hiring veterans. LVER staff continue the relationship building in response to the employer’s needs and objectives to retain better employees. LVERs plan employer workshops and promote job fair and recruitment events. LVERs also promote job development and provide information on hiring incentives for employers that hire and retain qualified veterans.

(c) The manner in which DVOP specialists and LVER staff are integrated into the State’s employment service delivery system or American Job Center;

The integration of DVOP staff in each AJC connects the veteran to all programs and services the AJC has to offer. This may include partner programs such as Workforce Innovation and Opportunity Act (WIOA) or the State Office of Rehabilitation Services (ORS) and/or ongoing activities including job recruitments, workshops, computer classes and job fairs.

DVOP staff are fully integrated into the AJC and are required to actively participate in all AJC activities so their customers can take full advantage of all available employment and training services. Staff meetings and training sessions amongst AJC partner programs and agencies such as WIOA, Trade Adjustment Assistance Program (TAA), Rapid Response, Reemployment Services and Eligibility Assessment (RESEA), and Employment services to partner programs including ORS, and RI Department of Elderly Affairs (DEA), Department of Human Services (DHS), are critical to the professional development of the DVOP staff. Their participation in these partner staff meetings broadens their knowledge of programs and resources, thus improving their capacity to effectively serve their customer base.

Veteran customers benefit from the team approach to service delivery and internal networking among staff. On behalf of their customers, staff are dedicated to the veterans program working closely with partner staff whose expertise varies from WIOA, TAA, Rapid Response, RESEA, and Employer Services to partner programs including ORS, DEA, and DHS. Outreach activities will ensure that the veteran community is aware of the services provided by the DVOP staff as well as the AJC. To help veterans access and connect to AJC partner programs, resources and service outreach activities are conducted at the following locations:

1. Veteran community care center at the VA Regional Hospital;
2. Homeless veterans projects at the Rhode Island Veterans Home;
3. Vocation Rehabilitation and Education (VR&E) unit at the VA Regional Office;
4. TAP seminars and follow-up activities at the Newport Naval Base;
5. National Guard demobilization events; and
6. Yellow Ribbon Events.

Rhode Island employs an Employment & Training Manager to oversee the implementation and delivery of veteran services in the state. This individual is responsible for the assessment and monitoring of all services provided to veteran customers; ensuring compliance with federal
Veterans Priority of Service requirements, coordination of services among partners, and the effective utilization of employment and training services. The success of this plan will be monitored and assessed by the review of case notes, system weekly reports, and quarterly reports made available via the State’s EmployRI database. The LVER staff are integrated into the Business Service Unit and participate in monthly meetings to review and update current employer outreach strategies. These employer outreach reviews are to ensure that veterans and eligible spouses are integrated into service delivery strategies.

(d) The Incentive Award program implemented using the 1% grant allocation set aside for this purpose, as applicable;

The Rhode Island Department of Labor & Training is not approved for Incentive Award program.

(e) The populations of eligible veterans to be served, including any additional populations designated by the Secretary as eligible for services, and any additional populations specifically targeted by the State Workforce Agency for services from one-stop delivery system partners (e.g., Native American veterans; veterans in remote rural counties or parishes);

The eligible veteran population to be serviced under the JVSG program have been outlined in Veteran Program Letter (VPL) No. 03-14, VPL 03-14 Change 1 &2, VPL No. 04-14 and VPL No. 08-14. The targeted veteran population is as follows:

1. A special disabled or disabled veteran, as those terms are defined in 38 U.S.C 4211(1) and (3); Special disabled and disabled veteran are those:
   a. Who are entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or,
   b. Were discharged or released from active duty because of a service-connected disability;

2. A homeless veteran, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. I 1302(a) and (b), as amended;

3. A recently-separated service member, as defined in 38 U.S.C § 4211(6)

4. A veteran who has been unemployed for 27 or more weeks in the previous 12 months;

5. An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;

6. A veteran lacking a high school diploma or equivalent certificate; or

7. A low-income individual (as defined by WIOA Section 3 (36))

8. Transitioning members of the Armed Forces who have been identified as in need of intensive services;

9. Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities or warrior transition units; and

10. The spouses or other family caregivers of such wounded, ill, or injured members

DVOPs are able to outreach veterans with one or more Significant Barriers to Employment (SBE). State strategies have also been developed to address veterans that do not qualify for
federal homeless programs and/or Vocational Rehabilitation and Employment (VR&E) services. The state will target non-qualifying veterans and refer them to the local NetworkRI Career Centers for re-employment and training services offered by Wagner-Peyser and WIOA. Rhode Island’s veteran population includes; incarcerated veterans who are served by the Department of Corrections along with the AJC and DVOP staff after the veteran is released from the Adult Correctional Institution (ACI), and Native American veterans who receive services in collaboration with AJC staff and the RI Indian Council in Providence. Through the collaboration with the RI Indian Council Native American veterans with SBEs will be identified and outreached in an attempt to provide services by DVOP staff.

(f) How the State implements and monitors the administration of priority of service to covered persons;

As required by 38 U.S.C 4215 (b) and 20 CFR part 1001 and 1010, priority of service is provided to ensure that veterans and eligible persons receive consideration for all opportunities for which they qualify within the employment service delivery system and any sub-grantee funded in whole or in part by the US Department of Labor. Rhode Island’s two local workforce development boards the Governors Workforce Board and the Workforce Solutions of Providence/Cranston, include the priority of service requirements in their local plans. At the local level, AJC managers are responsible for ensuring that priority of service is effectively integrated throughout the activities and services of the center. Our AJC centers have intake forms/sign in sheets to identify veterans and eligible persons when they visit our service delivery points in person. Front desk staff are trained to inquire about veteran status, so if the customer identifies as a veteran or an eligible person, the individual is provided immediate priority. In addition, display signs are posted at the AJC point of entry that clearly describes priority of service in an effort to encourage individuals to self-identify their veteran status. This information is also conveyed when veterans and eligible persons access services electronically. Our web-based EmployRI system includes content that explains priority of service, and provides veterans and eligible persons the opportunity to self-identify veteran status through virtual self-service registration.

If a veteran or an eligible person at the point of eligibility determination and enrollment, does not have the documentation verifying his or her eligibility for priority of service, he or she is afforded access on priority a basis to all services provided by program staff (including intensive services) while awaiting verification. The only services that require priority verification on eligibility prior to the provision of services are those required for the commitment of outside resources, such as classroom training.

(g) How the State provides or intends to provide and measure, through both the DVOP and American Job Center staff: (1) job and job training individualized career services, (2) employment placement services, and (3) job-driven training and subsequent placement service program for eligible veterans and eligible persons;
All eligible veterans and eligible persons referred to DVOP specialists will receive the following intensive services:

1. Comprehensive and Specialized Assessment
2. Individual Employment Plan
3. Group Career Counseling
4. Individual Career Counseling/Planning
5. Follow-up Activities

DVOP Specialist activities may include referrals to other agencies, supportive services, and/or career workshops to overcome employment barriers identified in the comprehensive assessment. Additional DVOP specialist and AJC staff activities include individual Job Search Planning, Résumé Preparation Assistance, and Labor Market Information for veterans and/or eligible persons.

Job development services will be facilitated by LVER staff and the Business Services Unit to coordinate veteran referrals to employers. All job postings within EmployRI will provide veterans and eligible persons a priority of service.

DVOP Specialist and AJC staff will refer veterans and eligible persons to applicable training programs based on training needs identified in the Individual Employment Plan (IEP). Veterans and eligible persons will be provided a priority of service on all available training programs funded in whole or in part by U.S. Department of Labor. JVSG and AJC performance goals will be measured through, ETA 9002 and Vets 200 reports to track the following categories:

1. Intensive Service Rate.
2. Enter Employment Rate (EER).
3. Employment Retention Rate (ERR).
4. Six Month Average Earnings (AE)

All reports are produced on a quarterly basis and are submitted to the State Director of Veterans Employment and Training (DVET) 45 days after close of quarter as outlined in VPL 01-15

(h) The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff; and,

All newly hired JVSG staff must complete required training within two years of hire date per VPL 07-10. All specialized training will be provided by National Veterans Training Institute (NVTI). DVOP staff must complete the following required courses; Facilitating Veteran Employment (FVE) and Intensive services (IS). LVER must complete the following required courses; Employer Outreach (EO) and Facilitating Veteran Employment (FVE). DVOP and LVER staff will receive additional training from NVTI upon; manager/staff request, availability of training openings and changes in JVSG program training requirements.
<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
<th>Date of Hire</th>
<th>Courses &amp; Completion Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jason T. Fafard</td>
<td>DVOP</td>
<td>09/08/2014</td>
<td>Facilitating Veteran Employment 12/05/2014</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Intensive Services 12/12/2014</td>
</tr>
<tr>
<td>Roger P. Richards</td>
<td>DVOP</td>
<td>12/26/2012</td>
<td>Labor &amp; Employment Specialist 05/11/2012</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Basic Veteran Benefits Online 01/07/2013</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Case Management 02/01/2013</td>
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<td></td>
<td></td>
<td></td>
<td>Promoting Partnerships for Employment 06/07/2013</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Intensive Services 07/18/2014</td>
</tr>
<tr>
<td>Brenda P Tetreault</td>
<td>DVOP</td>
<td>07/10/2005</td>
<td>Transition Assistance Program 03/03/2006</td>
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<td></td>
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<td>Case Management 06/23/2006</td>
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<td>Basic Veteran Benefits Online 02/26/2007</td>
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<td>Labor &amp; Employment Specialist 12/17/2010</td>
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<td>Promoting Partnerships for Employment 03/18/2011</td>
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<td>Intensive Services 04/03/2015</td>
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<tr>
<td>Jeremy B Tolleson</td>
<td>Veterans Program</td>
<td>01/26/2014</td>
<td>Orientation to Veterans Services 03/13/2014</td>
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<tr>
<td>Manager</td>
<td>LVER</td>
<td>11/20/2010</td>
<td></td>
</tr>
<tr>
<td>------------------</td>
<td>--------------</td>
<td>------------</td>
<td></td>
</tr>
</tbody>
</table>

Labor & Employment Specialist  
04/11/2014  
Intensive Services  
06/13/2014  
Facilitating Veteran Employment  
08/01/2014  
Leadership for Integration of Veterans Services  
11/07/2019  
Case Management  
06/21/2011  
Basic Veteran Benefits On-line  
03/16/2012  
Promoting Partnerships for Employment  
05/04/2012  
Employer Outreach  
06/13/2014  
Facilitating Veteran Employment  
07/25/2014  

(i) Such additional information as the Secretary may require.

Rhode Island is prepared to provide whatever additional information the Secretary may require.
UNEMPLOYMENT INSURANCE

The Unemployment Insurance (UI) program requires a State Quality Service Plan (SQSP) on a 2-year planning cycle that is a condition of receipt of administrative funding to administer the program. The SQSP is the State’s UI performance management and planning process that allows for an exchange of information between Federal and State partners to enhance the UI program’s ability to reflect their joint commitment to performance excellence and client-centered services. A formal two-year SQSP is submitted biennially. On the off years, States may be required to modify the SQSP with additional corrective action plans and narrative if they are failing any new performance measures, and they are required to provide updated budget documents, certifications, and assurances. ETA Handbook No. 336, 18th Edition provides detailed guidance for the preparation and submittal of the SQSP and supplemental guidance is provided in an annual UIPL, issued as UIPL 15-19 for the FY 2020 SQSP. The Social Security Act (SSA) sections 302 and 303 authorize the Secretary of Labor to provide funds to administer the UI program and govern the expenditure of those funds. States that choose the option to include UI in a WIOA Combined State Plan will be required to submit their SQSP through the Combined State Plan process. The SQSP must be prepared in accordance to the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a State chose to submit their SQSP through the Combined State Plan process.

Rhode Island’s most recent SQSP was updated in Quarter Ending 9/30/2019. A copy of the SQSP will be submitted with the 2020 State WIOA Plan.
Rhode Island employment is expected to increase by more than 30,500 jobs during the 2016-2026 projection period as the state’s economy continues to recover from recessionary losses. Employment in 2026 is projected to reach 550,700 an increase of 36,076 (5.9%) job from the 2016 employment level. Much of this growth is attributed to the increased demand for the products and services provided by the Accommodation & Food Services; Health Care & Social Assistance; Professional, Scientific & Technical Services; and Retail Trade sectors. Nationally, employment is projected to increase by 7.4 percent.

<table>
<thead>
<tr>
<th>Rhode Island Industry Projections by Economic Sector</th>
<th>2016 - 2026</th>
<th>2016</th>
<th>2026</th>
<th>Numeric Change</th>
<th>Percent Change</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>Projected</td>
<td>Projected</td>
<td>Employment</td>
<td>Employment</td>
<td></td>
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<tr>
<td>Statewide</td>
<td>520,251</td>
<td>550,715</td>
<td>30,364</td>
<td>5.90</td>
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<tr>
<td>Health Care &amp; Social Assistance</td>
<td>82,389</td>
<td>86,500</td>
<td>4,111</td>
<td>5.00</td>
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<tr>
<td>Accommodation &amp; Food Services</td>
<td>48,204</td>
<td>52,761</td>
<td>4,557</td>
<td>9.50</td>
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<tr>
<td>Retail Trade</td>
<td>48,190</td>
<td>50,653</td>
<td>2,463</td>
<td>5.10</td>
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<tr>
<td>Educational Services</td>
<td>44,329</td>
<td>45,550</td>
<td>1,221</td>
<td>2.80</td>
<td></td>
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<tr>
<td>Manufacturing</td>
<td>40,420</td>
<td>42,510</td>
<td>2,090</td>
<td>5.20</td>
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<tr>
<td>Government</td>
<td>31,431</td>
<td>32,028</td>
<td>597</td>
<td>1.90</td>
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<tr>
<td>Administrative &amp; Waste Services</td>
<td>27,873</td>
<td>30,301</td>
<td>2,428</td>
<td>8.70</td>
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<tr>
<td>Finance &amp; Insurance</td>
<td>26,572</td>
<td>28,120</td>
<td>1,548</td>
<td>5.80</td>
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<tr>
<td>Construction</td>
<td>18,134</td>
<td>20,401</td>
<td>2,267</td>
<td>12.50</td>
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<tr>
<td>Other Services (except Government)</td>
<td>17,951</td>
<td>18,751</td>
<td>800</td>
<td>4.50</td>
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<tr>
<td>Wholesale Trade</td>
<td>16,484</td>
<td>16,893</td>
<td>409</td>
<td>2.50</td>
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<tr>
<td>Management of Companies &amp; Enterprises</td>
<td>13,378</td>
<td>14,213</td>
<td>835</td>
<td>6.20</td>
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<tr>
<td>Transportation &amp; Warehousing</td>
<td>9,939</td>
<td>10,748</td>
<td>809</td>
<td>8.10</td>
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<tr>
<td>Arts, Entertainment, &amp; Recreation</td>
<td>9,311</td>
<td>10,055</td>
<td>744</td>
<td>8.00</td>
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<tr>
<td>Real Estate &amp; Rental &amp; Leasing</td>
<td>6,108</td>
<td>6,534</td>
<td>426</td>
<td>7.00</td>
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<tr>
<td>Information</td>
<td>6,114</td>
<td>6,507</td>
<td>393</td>
<td>6.40</td>
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<td>Utilities</td>
<td>1,081</td>
<td>1,087</td>
<td>6</td>
<td>0.60</td>
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</table>
Occupational Outlook

Rhode Island employment in 2026 is projected to reach 550,700 an increase of 30,400 (5.9%) from our 2016 employment. Much of this growth is attributed to the increased demand for the products and services provided by Accommodation & Food Services; Health Care & Social Assistance; Professional, Scientific & Technical Services and Retail Trade Sectors. Nationally, employment is projected to increase by 7.4 percent.

Several occupational groups are expected to grow at above average (7.1%) rates. Among the fastest growing occupational groups are Construction & Extraction (13.8%), Computer & Mathematical (12.3%), Architecture & Engineering (10.5%), Personal Care & Service Occupations (9.4%) and Food Preparation & Serving Related Occupations (8.9%). These occupational groups are expected to generate nearly 12,000 new jobs during the projected period.

<table>
<thead>
<tr>
<th>Employment</th>
<th>2016</th>
<th>2026</th>
<th>Change</th>
<th>Exits</th>
<th>Transfers</th>
<th>Growth</th>
<th>Total</th>
</tr>
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<tbody>
<tr>
<td>Statewide, All Occupations</td>
<td>520,251</td>
<td>550,715</td>
<td>5.9</td>
<td>250,610</td>
<td>329,654</td>
<td>30,464</td>
<td>610,728</td>
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<tr>
<td>Management Occupations</td>
<td>24,445</td>
<td>26,490</td>
<td>8.4</td>
<td>6,541</td>
<td>13,101</td>
<td>2,045</td>
<td>21,687</td>
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<tr>
<td>Business &amp; Financial Operations Occupations</td>
<td>28,014</td>
<td>30,182</td>
<td>7.7</td>
<td>8,496</td>
<td>16,709</td>
<td>2,168</td>
<td>27,373</td>
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<tr>
<td>Computer &amp; Mathematical Occupations</td>
<td>14,851</td>
<td>16,671</td>
<td>12.3</td>
<td>2,670</td>
<td>7,519</td>
<td>1,820</td>
<td>12,009</td>
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<tr>
<td>Architecture &amp; Engineering Occupations</td>
<td>7,871</td>
<td>8,696</td>
<td>10.5</td>
<td>2,040</td>
<td>3,740</td>
<td>825</td>
<td>6,605</td>
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<tr>
<td>Life, Physical, &amp; Social Science Occupations</td>
<td>2,992</td>
<td>3,222</td>
<td>7.7</td>
<td>776</td>
<td>1,742</td>
<td>230</td>
<td>2,748</td>
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<tr>
<td>Community &amp; Social Service Occupations</td>
<td>9,805</td>
<td>10,396</td>
<td>6.0</td>
<td>3,988</td>
<td>6,735</td>
<td>591</td>
<td>11,314</td>
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<tr>
<td>Legal Occupations</td>
<td>6,292</td>
<td>6,714</td>
<td>6.7</td>
<td>1,574</td>
<td>2,196</td>
<td>422</td>
<td>4,192</td>
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<tr>
<td>Education, Training, &amp; Library Occupations</td>
<td>33,122</td>
<td>34,326</td>
<td>3.6</td>
<td>15,131</td>
<td>14,161</td>
<td>1,204</td>
<td>30,496</td>
</tr>
<tr>
<td>Arts, Design, Entertainment, Sports, &amp; Media Occupations</td>
<td>8,639</td>
<td>8,967</td>
<td>3.8</td>
<td>3,610</td>
<td>5,134</td>
<td>328</td>
<td>9,072</td>
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<tr>
<td>Healthcare Practitioners &amp; Technical Occupations</td>
<td>36,067</td>
<td>37,908</td>
<td>5.1</td>
<td>9,397</td>
<td>8,710</td>
<td>1,841</td>
<td>19,948</td>
</tr>
<tr>
<td>Healthcare Support Occupations</td>
<td>21,541</td>
<td>23,266</td>
<td>8.0</td>
<td>12,810</td>
<td>12,050</td>
<td>1,725</td>
<td>26,585</td>
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<td>Protective Service Occupations</td>
<td>12,471</td>
<td>12,735</td>
<td>2.1</td>
<td>6,945</td>
<td>7,041</td>
<td>264</td>
<td>14,250</td>
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<tr>
<td>Occupation</td>
<td>Current Year</td>
<td>Past Year</td>
<td>Change (%)</td>
<td>Current Year</td>
<td>Past Year</td>
<td>Change</td>
<td>Change Over Last 5 Years</td>
</tr>
<tr>
<td>------------------------------------------------</td>
<td>--------------</td>
<td>-----------</td>
<td>------------</td>
<td>--------------</td>
<td>-----------</td>
<td>--------</td>
<td>------------------------</td>
</tr>
<tr>
<td>Food Preparation &amp; Serving Related Occupations</td>
<td>50,887</td>
<td>55,424</td>
<td>8.9</td>
<td>40,103</td>
<td>50,495</td>
<td>4,372</td>
<td>1,951,135</td>
</tr>
<tr>
<td>Building &amp; Grounds Cleaning &amp; Maintenance Occupations</td>
<td>19,543</td>
<td>20,953</td>
<td>7.2</td>
<td>11,823</td>
<td>13,015</td>
<td>1,192</td>
<td>26,248</td>
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<tr>
<td>Personal Care &amp; Service Occupations</td>
<td>17,951</td>
<td>19,641</td>
<td>9.4</td>
<td>13,585</td>
<td>12,698</td>
<td>887</td>
<td>27,973</td>
</tr>
<tr>
<td>Sales &amp; Related Occupations</td>
<td>50,766</td>
<td>53,106</td>
<td>4.6</td>
<td>29,739</td>
<td>39,641</td>
<td>9,902</td>
<td>371,720</td>
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<tr>
<td>Office &amp; Administrative Support Occupations</td>
<td>76,461</td>
<td>76,008</td>
<td>-0.6</td>
<td>39,119</td>
<td>45,790</td>
<td>-6,671</td>
<td>284,456</td>
</tr>
<tr>
<td>Farming, Fishing, &amp; Forestry Occupations</td>
<td>1,245</td>
<td>1,305</td>
<td>4.8</td>
<td>463</td>
<td>1,328</td>
<td>-865</td>
<td>1,851</td>
</tr>
<tr>
<td>Construction &amp; Extraction Occupations</td>
<td>22,148</td>
<td>25,196</td>
<td>13.8</td>
<td>8,292</td>
<td>15,142</td>
<td>6,850</td>
<td>26,482</td>
</tr>
<tr>
<td>Installation, Maintenance, &amp; Repair Occupations</td>
<td>16,927</td>
<td>18,183</td>
<td>7.4</td>
<td>6,102</td>
<td>10,387</td>
<td>4,285</td>
<td>17,745</td>
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<tr>
<td>Production Occupations</td>
<td>31,365</td>
<td>32,727</td>
<td>4.3</td>
<td>13,674</td>
<td>22,825</td>
<td>9,151</td>
<td>37,861</td>
</tr>
<tr>
<td>Transportation &amp; Material Moving Occupations</td>
<td>26,848</td>
<td>28,599</td>
<td>6.5</td>
<td>13,732</td>
<td>19,495</td>
<td>5,763</td>
<td>34,978</td>
</tr>
</tbody>
</table>
High Demand Occupations

The occupations with the most total openings will be the ones most in demand over the projection period. The 50 occupations listed are projected to have 348,000 job openings and account for more than half of the total openings through 2026. For most of the occupations listed, the need to replace workers leaving an occupation is projected to create more openings than openings created by new/expanding businesses.

### Rhode Island High Demand Occupations by Annual Openings

**2016 - 2026**

<table>
<thead>
<tr>
<th>Occupation</th>
<th>Annual Openings</th>
<th>Occupation</th>
<th>Annual Openings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retail Salespersons</td>
<td>21,904</td>
<td>Maids &amp; Housekeeping Cleaners</td>
<td>5,301</td>
</tr>
<tr>
<td>Waiters &amp; Waitresses</td>
<td>20,839</td>
<td>Helpers--Production Workers</td>
<td>5,259</td>
</tr>
<tr>
<td>Combined Food Preparation &amp; Serving Workers (Including Fast Food)</td>
<td>20,621</td>
<td>First-Line Supervisors: Food Preparation &amp; Serving Workers</td>
<td>5,198</td>
</tr>
<tr>
<td>Cashiers</td>
<td>19,450</td>
<td>Home Health Aides</td>
<td>5,193</td>
</tr>
<tr>
<td>Customer Service Representatives</td>
<td>13,077</td>
<td>Light Truck or Delivery Services Drivers</td>
<td>5,107</td>
</tr>
<tr>
<td>Nursing Assistants</td>
<td>12,352</td>
<td>Accountants &amp; Auditors</td>
<td>5,081</td>
</tr>
<tr>
<td>Office Clerks, General</td>
<td>10,934</td>
<td>Receptionists &amp; Information Clerks</td>
<td>5,054</td>
</tr>
<tr>
<td>Janitors &amp; Cleaners</td>
<td>10,346</td>
<td>Childcare Workers</td>
<td>4,669</td>
</tr>
<tr>
<td>Stock Clerks &amp; Order Fillers</td>
<td>9,947</td>
<td>Maintenance &amp; Repair Workers, General</td>
<td>4,520</td>
</tr>
<tr>
<td>Laborers &amp; Freight, Stock, &amp; Material Movers, Hand</td>
<td>9,298</td>
<td>Construction Laborers</td>
<td>4,363</td>
</tr>
<tr>
<td>Food Preparation Workers</td>
<td>8,277</td>
<td>Heavy &amp; Tractor-Trailer Truck Drivers</td>
<td>4,244</td>
</tr>
<tr>
<td>Counter Attendants, Cafeteria, Concession, &amp; Coffee Shop</td>
<td>8,244</td>
<td>Security Guards</td>
<td>3,973</td>
</tr>
<tr>
<td>Cooks, Restaurant</td>
<td>7,882</td>
<td>Dishwashers</td>
<td>3,419</td>
</tr>
<tr>
<td>Landscaping &amp; Groundskeeping Workers</td>
<td>7,691</td>
<td>Management Analysts</td>
<td>3,287</td>
</tr>
<tr>
<td>Registered Nurses</td>
<td>7,409</td>
<td>Hairdressers, Hairstylists, &amp; Cosmetologists</td>
<td>3,286</td>
</tr>
<tr>
<td>Bookkeeping, Accounting, &amp; Auditing Clerks</td>
<td>6,807</td>
<td>Hosts &amp; Hostesses, Restaurant, Lounge, &amp; Coffee Shop</td>
<td>3,262</td>
</tr>
<tr>
<td>Personal Care Aides</td>
<td>6,694</td>
<td>Dining Room &amp; Cafeteria Attendants &amp; Bartender Helpers</td>
<td>3,218</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------</td>
<td>-------------</td>
<td>-----------------------------</td>
<td>-------------------</td>
</tr>
<tr>
<td>First-Line Supervisors of Retail Sales Workers</td>
<td>6,644</td>
<td>3,189</td>
<td></td>
</tr>
<tr>
<td>Bartenders</td>
<td>6,270</td>
<td>3,135</td>
<td></td>
</tr>
<tr>
<td>General &amp; Operations Managers</td>
<td>6,232</td>
<td>3,034</td>
<td></td>
</tr>
<tr>
<td>Secretaries &amp; Administrative Assistants</td>
<td>6,099</td>
<td>3,016</td>
<td></td>
</tr>
<tr>
<td>Carpenters</td>
<td>5,946</td>
<td>2,960</td>
<td></td>
</tr>
<tr>
<td>Sales Representatives, Wholesale &amp; Manufacturing</td>
<td>5,898</td>
<td>2,916</td>
<td></td>
</tr>
<tr>
<td>First-Line Supervisors: Office &amp; Administrative Support Workers</td>
<td>5,652</td>
<td>2,833</td>
<td></td>
</tr>
<tr>
<td>Teacher Assistants</td>
<td>5,531</td>
<td>2,770</td>
<td></td>
</tr>
</tbody>
</table>

(2) Discuss how the long-term job projections discussed in the economic analysis section of strategic plan relate to the types of unsubsidized jobs for which SCSEP participants will be trained and the types of skill training to be provided. (20 CFR 641.302(d))

The Rhode Island SCSEP program is concerned for the participants in the SCSEP program. According to the Rhode Island DLT’s Labor Market Information (LMI) Unit, the following industries are projected to rank among the fastest growing from 2016 to 2026: Construction & Extraction (20.9%), Healthcare Support (20.4%), Personal Care & Service (18.2%), Computer & Mathematical (16.7%), and Business & Financial Operations (14.5%). These industries are not the common job skill training for SCSEP participants. The RI SCSEP participants lack the education and experience to apply for these positions. However, the SCSEP participants can be trained for the “supportive services” to these industries. Past trainings and Job placements have included positions such as Food Preparation and Service; Education, Training, and Library Services; Office and Administrative Support; Retail, Sales, and Related Services; Maintenance and Custodial Services; Personal Care and Service; Production, Assembly, Light Industrial; Protective Service; Transportation and Material Moving; Community and Social Services; Management; Healthcare; and Legal Services. This strategy has proven successful and will continue to be followed.
Employment in Rhode Island is projected to grow at all education and skill levels, from jobs requiring less than a high school diploma to those requiring advanced degrees. During the 2016-2026 projection period, it is estimated that employers will need to find workers to fill nearly 30,000 new jobs and to replace nearly 580,000 workers who will leave their jobs for various reasons.

Parallel to the national distribution, jobs requiring a high school diploma for entry into occupation represent the largest portion of the Rhode Island labor market. Nearly 38 percent of Rhode Island jobs typically require a high school education; on par with the national percentage (39.4%). Between 2016 and 2026, there are nearly 235,000 openings projected for occupations at this educational level.

Jobs requiring college degrees (Associate, Bachelor’s, Master’s or Doctoral) represent nearly thirty percent (29.2%) of the current occupational distribution in Rhode Island, slightly higher than the national average (28.1%). During the projection period it is estimated that there will be nearly 125,000 openings for occupations requiring a minimum of an Associate degree.

<table>
<thead>
<tr>
<th>Education Level</th>
<th>2016</th>
<th>2026</th>
<th>Exits</th>
<th>Openings Due To Transfers</th>
<th>Growth</th>
<th>Total Openings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Doctoral or professional degree</td>
<td>19,483</td>
<td>20,335</td>
<td>4,552</td>
<td>4,601</td>
<td>852</td>
<td>10,005</td>
</tr>
<tr>
<td>Master's degree</td>
<td>11,028</td>
<td>11,752</td>
<td>3,698</td>
<td>5,366</td>
<td>724</td>
<td>9,788</td>
</tr>
<tr>
<td>Bachelor's degree</td>
<td>108,530</td>
<td>116,777</td>
<td>32,824</td>
<td>54,379</td>
<td>8,247</td>
<td>95,450</td>
</tr>
<tr>
<td>Associate degree</td>
<td>12,824</td>
<td>13,606</td>
<td>4,228</td>
<td>6,265</td>
<td>782</td>
<td>11,275</td>
</tr>
<tr>
<td>Postsecondary non-degree award</td>
<td>35,016</td>
<td>36,893</td>
<td>16,844</td>
<td>18,795</td>
<td>1,877</td>
<td>37,516</td>
</tr>
<tr>
<td>Some college, no degree</td>
<td>13,746</td>
<td>13,858</td>
<td>7,376</td>
<td>6,645</td>
<td>112</td>
<td>14,133</td>
</tr>
<tr>
<td>High school diploma or equivalent</td>
<td>199,190</td>
<td>208,902</td>
<td>95,285</td>
<td>129,581</td>
<td>9,712</td>
<td>234,578</td>
</tr>
<tr>
<td>No formal educational credential</td>
<td>120,434</td>
<td>128,592</td>
<td>85,803</td>
<td>104,022</td>
<td>8,158</td>
<td>197,983</td>
</tr>
</tbody>
</table>

Prior work experience in a previous occupation is required for fifteen percent of the occupations in our workforce. Ten percent of all occupations require from 1 to 5 years of work experience.
Typical Work Experience Needed

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2026</th>
<th>Exits</th>
<th>Openings Due to Transfers</th>
<th>Growth</th>
<th>Total Openings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grand Total</td>
<td>520,251</td>
<td>550,715</td>
<td>250,610</td>
<td>329,654</td>
<td>30,464</td>
<td>610,728</td>
</tr>
<tr>
<td>5 years or more</td>
<td>19,722</td>
<td>21,573</td>
<td>5,394</td>
<td>11,229</td>
<td>1,851</td>
<td>18,474</td>
</tr>
<tr>
<td>Less than 5 years</td>
<td>52,906</td>
<td>56,087</td>
<td>21,000</td>
<td>32,578</td>
<td>3,181</td>
<td>56,759</td>
</tr>
<tr>
<td>None</td>
<td>447,623</td>
<td>473,055</td>
<td>224,216</td>
<td>285,847</td>
<td>25,432</td>
<td>535,495</td>
</tr>
</tbody>
</table>

Occupational distribution of the typical on-the-job training needed to attain competency for Rhode Island occupations.

<table>
<thead>
<tr>
<th>Occupational distribution of the typical on-the-job training needed to attain competency for Rhode Island occupations.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Typical Work Experience Needed</td>
</tr>
<tr>
<td>2016</td>
</tr>
<tr>
<td>---------</td>
</tr>
<tr>
<td>Grand Total</td>
</tr>
<tr>
<td>5 years or more</td>
</tr>
<tr>
<td>Less than 5 years</td>
</tr>
<tr>
<td>None</td>
</tr>
</tbody>
</table>

Employment

<table>
<thead>
<tr>
<th>Typical Education Needed For Job</th>
<th>2016</th>
<th>2026</th>
<th>Exits</th>
<th>Openings Due to Transfers</th>
<th>Growth</th>
<th>Total Openings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Internship/residency</td>
<td>10,116</td>
<td>10,372</td>
<td>2,232</td>
<td>2,931</td>
<td>256</td>
<td>5,419</td>
</tr>
<tr>
<td>Apprenticeship</td>
<td>10,517</td>
<td>12,483</td>
<td>3,975</td>
<td>7,255</td>
<td>1,966</td>
<td>13,196</td>
</tr>
<tr>
<td>Long-term on-the-job training</td>
<td>17,019</td>
<td>17,862</td>
<td>6,118</td>
<td>9,462</td>
<td>843</td>
<td>16,423</td>
</tr>
<tr>
<td>Moderate-term on-the-job training</td>
<td>82,822</td>
<td>86,354</td>
<td>34,338</td>
<td>52,304</td>
<td>3,532</td>
<td>90,174</td>
</tr>
<tr>
<td>Short-term on-the-job training</td>
<td>205,229</td>
<td>216,128</td>
<td>134,171</td>
<td>159,459</td>
<td>10,899</td>
<td>304,529</td>
</tr>
<tr>
<td>None</td>
<td>194,548</td>
<td>207,516</td>
<td>69,776</td>
<td>98,243</td>
<td>12,968</td>
<td>180,987</td>
</tr>
</tbody>
</table>

National employer surveys also indicate the need for workers to have basic and “soft” skills now and in the future. For almost a decade, the National Association of Colleges and Employers has surveyed employers about their “most-wanted” skills. Transferable “soft skills” are those that are important to employers—regardless of the jobs pay or rank. The types of skills possessed by individuals eligible for and/or participating in the RI SCSEP are in line with the projected growth in employment opportunities in Rhode Island as well as the education and skill levels needed to fill those opportunities.

(b) Service Delivery and Coordination

(1) A description of actions to coordinate SCSEP with other programs. This may alternatively be discussed in the State strategies section of the strategic plan, but regardless of placement in document, must include:

(A) Planned actions to coordinate activities of SCSEP grantees with WIOA title I programs, including plans for using the WIOA one-stop delivery system and its partners to serve individuals aged 55 and older. (20 CFR 641.302(g),641.325(e))

The RI DLT is a partner in the One-Stop Delivery System, including the American Job Centers (AJC’s). The RI DLT has a Memorandum of Understanding (MOU) with the Providence/Cranston Workforce Development Board. SCSEP information is shared with the AJC’s, such as program
eligibility requirements and priorities, open training slots, and workshop information. In addition, information is shared regarding the fastest growing industries, occupations and businesses that offer appropriate job opportunities for SCSEP participants. Also, SCSEP marketing materials, such as pamphlets (including bilingual materials) are placed at the AJC’s and updated and replenished during frequent visits. SCSEP staff and participants will continue to participate in Job Recruitments at the AJC’s. In addition, they will cross flow job market and training information between the AJC’s and the SCSEP program staff. And, the RI DLT staff will disseminate information regarding training vacancies and refer potential applicants to the SCSEP program. RI DLT also works with returning citizens who are 55 and older and helps them transition back into the community by enrolling them into SCSEP. Exiting participants will be encouraged to continue their association with the AJC’s. Participants who have reached their individual durational limit for SCSEP services - but who have not yet obtained unsubsidized employment - will be referred to the AJC’s for further job search and training support through WIOA Title 1 services.

(B) Planned actions to coordinate activities of SCSEP grantees with the activities being carried out in the State under the other titles of the Older Americans Act (OAA). (20 CFR 641.302(h))

Rhode Island SCSEP collaborates with other Older Americans Act programs, such as the nutrition and adult day programs. These partnerships have led to the establishment of effective training assignments that provide much needed services to older Rhode Islanders. And, SCSEP participants have been hired by host training sites that provide OAA program services.

(C) Planned actions to coordinate SCSEP with other private and public entities and programs that provide services to older Americans, such as community and faith-based organizations, transportation programs, and programs for those with special needs or disabilities. (20 CFR 641.302(i))

The SCSEP program collaborates and leverages resources with many organizations to provide training and supportive services for the participants. Some of these entities include host training sites, educational organizations, veteran representatives, vocational rehabilitation activities, and social service agencies. In addition, RI SCSEP coordinates with many agencies to help participants in need of services such as subsidized housing or temporary shelters; no-cost medical and prescription programs; Catholic Charities; energy assistance; utility discounts; food stamps; Supplemental Security Income; reduced fares on transportation; the RI Food Bank; church-provided food and clothing; and, nutrition programs provided through the Older Americans Act. For participants who will exit SCSEP without a job, referrals will be made to programs such as Foster Grandparents. Those exiting participants who wish to volunteer will be referred to opportunities such as through the American Red Cross, Salvation Army, United Way, Big Brothers Big Sisters and other organizations who seek people to contribute on a voluntary basis.
RI SCSEP will maintain close liaison with the Department of Labor’s AJC’s to monitor job market trends and opportunities. Working relationships will be maintained with the One-Stops, including Disability Specialists from the Office of Rehabilitative Services (ORS) and Veteran Representatives. Also, SCSEP participants will continue to be assigned to a Principal Interviewer at the One-Stops to facilitate a cross flow of information and to provide services. Also, job market information such as the Occupation and Industry Projections information will be considered when making training decisions. And, the state’s four AJC’s will continue to be consulted as they provide daily support in the transition of SCSEP participants to jobs. For example, sub-grantees will visit the AJC’s on a frequent basis to discuss new programs, workshops, and training that can be offered to SCSEP participants.

RI SCSEP will continue its collaboration with the One-Stop system, including the AJC’s and the Providence/Cranston Workforce Development Board. SCSEP program managers and staff are located at the AJC’s and are constantly aware of any new programs, workshops or training that may be available to participants. SCSEP marketing materials, such pamphlets (including bilingual materials) are placed at the Centers and updated and replenished when necessary. Access to intensive training services will continue to be considered with the above collaborative actions.

Rhode Island does not have a strategy to work with local economic development offices in rural location. According to the SCSEP final rule where rural is defined as “areas not designated as a metropolitan statistical area by the Census Bureau; segments within metropolitan counties identified by codes 4 through 10 in the Rural Urban Commuting Area (RUCA) system; and RUCA codes 2 and 3 for census tracts that are larger than 400 square miles and have populations density of less than 30 people per square mile”, there do not exist any communities that are considered rural communities.
RI SCSEP will continue to emphasize actions that transition participants to successful unsubsidized employment. A significant portion of that effort goes towards strengthening working relationships with the organizations that hire SCSEP participants and in establishing new relationships with potential employers. The Program develops job leads and identifies potential employers in the public and private sectors by advertising, attending job fairs, responding to ads in local newspapers, and contacting employers (in person, by telephone, and by letter). The Program will continue to use the Internet to access various job search sites in an effort to identify job opportunities for SCSEP participants.

The SCSEP partnership with the AJC’s will continue to be maintained and improved. Program managers and staff are in constant communication regarding potential job leads and trainings. After each SCSEP participant has been transitioned to his or her unsubsidized job, follow ups will be accomplished with the successful person and his or her new workplace to facilitate long term employment.

The Program will maintain contact with the employers who have hired participants in the past to promote goodwill and future job prospects. Follow-up activities that are required by Program regulations, as well as more informal contacts, increase the probability of retention and of employers being receptive to SCSEP when additional jobs become available. Also, to foster good job retention and employer relations, emphasis will continue to be placed on sending qualified and suitable participants to each particular job interview. The typical SCSEP participant usually accepts only part-time employment with day time hours during the normal work week. Therefore, the program mostly targets community service organizations and small businesses, since these employers have more of the types of jobs that SCSEP participants are seeking. Also, because SCSEP participants do not normally accept relocations or extended commutes, the Program has primarily focused on the local, community job markets. A significant portion of the Program’s unsubsidized placements occur when the host training sites hire the SCSEP participants that are assigned to them. Program managers and staff will continue to routinely visit host training sites to encourage them to hire their assigned SCSEP participants when there are job openings and available funds. The value and benefits of hiring their SCSEP trained participants will continue to be emphasized.
Historically, the majority of participants in RI SCSEP have been minority individuals. For example, the most recent U.S. DOL SCSEP minority report indicates that the state’s overall incidence of all minorities in the population was 24.4% while the SCSEP enrollment percentage is 36.0%. RI SCSEP has emphasized and will continue to focus on minority enrollments. RI SCSEP enrollment levels for minorities in PY 2018 have been positive. For example, the percentage of minority enrollees in the Program Year 2018 totaled 23%; and, the Hispanic enrollment level was 13%. RI SCSEP will continue to recruit the minority population in many ways, such as: (1) contacting community agencies, minority churches and organizations that serve multi-cultural populations; (2) assigning participants to host training sites which serve and communicate with the minority population; (3) inviting guest speakers from the minority community to participate in SCSEP workshops; (4) asking all participants, including minority individuals, to make program referrals for family, friends, and other contacts.

The Program views the distribution of community service needs across the State as being in-line with the equitable distribution of program-eligible individuals.

1) Needs of Individuals:
Many SCSEP participants are in need of various supportive services. The needs of individuals will be met so they can fully benefit from SCSEP services and be in the best position to obtain and retain unsubsidized jobs. Sub-grantee staffs will provide job-related or personal counseling directly; or, by referral to community resources that are better qualified to deal with particular problems. When the need is job-related, the counseling may also include the Participant’s training site supervisor. If the subgrantee cannot satisfy a Participant’s personal or social need, there will be access to a full array of services through information and referral networks and procedures. Services include legal assistance, health care agencies, educational opportunities, Social Security benefits; and, clothing, housing, home heating fuel and transportation assistance. In addition, incidentals necessary for training site assignments (e.g. safety glasses, work shoes, etc.) will be obtained by referral to social agencies that may provide them without charge.

2) Community Services and Supportive Services:
The work of collecting, monitoring, and analyzing community service needs is an ongoing process. SCSEP’s service to a community is based primarily on the social and economic needs of the participants entering the program; and, on the demand for services within local communities.
The identification of potential training sites is accomplished through community outreach efforts, such as through meetings with current and potential host training sites, to determine where the greatest needs for SCSEP assignments exist. Efforts also include frequent coordination with the One-Stop Career Centers and Rhode Island’s Division of Elderly Affairs to monitor community needs. RI SCSEP initiates and maintains partnerships with area non-profit agencies that provide a wide range of services, including: adult day programs, child day care, food services, recreational facilities, health care, and social services. The current focus is on community service needs being supported through the state’s network of senior centers, state service centers, housing agencies, shelters, and child care facilities.

Efforts are ongoing to expand the reach of SCSEP throughout the State. For example, there is an ongoing effort to recruit additional community service training sites in RI to complement the existing sites. Existing sites include Amos House; George Wiley Center; Comprehensive Community Action Inc; YMCA; State of Rhode Island; West Warwick Housing Authority; Center for Justice; Inspiring Minds.

(5) The State’s long-term strategy to improve SCSEP services, including planned long-term changes to the design of the program within the State, and planned changes in the use of SCSEP grantees and program operators to better achieve the goals of the program. This may include recommendations to the Department as appropriate. (20 CFR641.302(k))

RI SCSEP has been successful for many years in providing work experience, supportive services and job search assistance to Older Workers and, in assigning productive trainees to community service agencies. The Program has helped Older Rhode Islanders become job-ready and to reenter the workforce - while providing employers with trained individuals. The Department of Labor and Training serves three counties. The distribution of authorizations is based on the Equitable Distribution as provided by U.S. DOL, which identifies each County’s percentage of the state’s program-eligible population. The Program Year 2018 grant funds 44 authorizations and 31 modified positions across the state, according to the following allocations: Bristol County – 5 slots; Kent County – 5 slots; Providence County – 21 slots.

Since 2017, RI SCSEP has been operated by the Rhode Island Department and Labor and Training. SCSEP has been administered by RIDLT through the Chief of Labor and Training Operations overseeing the program in its entirety with a Coordinator of Employment and Training Programs overseeing the day to day operations. In addition, RIDLT has an Assistant Coordinator assigned to SCSEP to assist the Coordinator in overseeing the SCSEP Counselors assigned to work with participants. This change in program operator has allowed RI SCSEP to focus on building stronger partnerships with AJC partners as SCSEP staff are co-located in the AJC. Participants will be able to access AJC partner programs like Wagner-Peyser and WIOA through their SCSEP counselor. Due to this change in program operator, the RI SCSEP program was redesigned to operate more efficiently to achieve higher performance measures than previous years with a goal of participants obtaining unsubsidized employment in a shorter time.
than previous program years. RI SCSEP would recommend that U.S. DOL continue to increase
nationwide outreach so that employers become more aware of SCSEP and its job-ready
participants

(6) The State’s strategy for continuous improvement in the level of performance for SCSEP
participants’ entry into unsubsidized employment, and to achieve, at a minimum, the levels
specified in OAA Section 513(a)(2)(E)(ii). (20 CFR 641.302(f))

1) Targeting Jobs Effectively:
RI SCSEP has been most successful in placing its participants in unsubsidized employment with
community service agencies -- especially with host training sites -- and in other service-oriented
industries. The most prevalent occupations for SCSEP participants include jobs in maintenance
and custodial work; as office clerks and receptionists; van drivers; child care workers; senior
center program assistants; retail sales associates; housekeeping; food service; and, in customer
service. The Program focuses on all areas of the state. However, many participants cannot - or
prefer not to - have long commutes to and from work; so, all attempts will be made to identify
and develop local job opportunities. Again, a significant portion of the Program’s unsubsidized
placements occur when community service training sites hire SCSEP participants that have been
training at the sites. Therefore, program managers and staff will routinely visit host training
sites and encourage them to hire their assigned SCSEP participants as funds becomes available.
The value and benefits of hiring their trained participants will be emphasized. Also, the Program
will require training sites to sign a Letter of Agreement that clearly describes the temporary
nature of training assignments; and, which emphasizes the site’s responsibility for considering
qualified participants for jobs.

2) Working with the AJC’s Effectively:
The Program will continue to partner with the AJC’s to monitor information on job openings
and trends that will help identify current and future regional job opportunities. Information will
be tracked regarding the fastest growing industries and the occupations and businesses that
offer appropriate job opportunities for SCSEP participants. Also, future coordination will

3) Managing Durational Limits Effectively:
The Program will continue to provide quality support to each participant who is approaching his
or her SCSEP durational limit (e.g. not employed after 48 months in the program). The grantee
will continue to train on individual durational limit requirements; transitional planning and
scheduling; conducting assessments; preparing and implementing transitional Individual
Employment Plans; researching the local job market; and, on accessing all supportive services
available to assist the SCSEP participants. When a participant receives an assessment 12
months before his or her durational limit date, a transitional IEP is developed and initiated.
Also, a reassessment will be accomplished six months before the individual’s durational limit
date (or sooner, if needed); and, his or her transitional IEP will be updated during the
reassessment. For individuals with good or reasonable job potential, transitional IEP actions
may include polishing resumes and interviewing skills; enhancing job development and training
efforts; and/or making rotations. In addition, to foster good employer relations during the
transition process, emphasis will be placed on sending qualified and suitable participants to
each job interview.

4) Training Participants Effectively:
Participant training is a key ingredient for successful program performance. The following
training activities are ongoing and will continue to be emphasized:

A). In addition to providing quality work experience, the host training sites will be encouraged
to make formal in-service and on-the-job training available for their assigned SCSEP
participants. The intent is not only to increase effectiveness in the current assignment, but also
to further prepare participants for unsubsidized employment. Training will be consistent with
each participant’s assessment and Individual Employment Plan. Also, computer training and
experience will continue to be emphasized and provided at the AJC. In addition, SCSEP will
continue to collaborate with the local libraries and non-provide agencies that offer free
training.

B) Participants will be referred to workshops at the AJC or partner agencies, covering different
aspects of the job-seeking process and topics relating to health, consumer information,
transportation, social security and retirement security. Workshops include speakers from
community service organizations, government agencies, and the local business community. In
addition, workshops will continue to be arranged for specific skills -- such as customer service.

C) Participants seeking full time employment - who would improve their potential for transition
into unsubsidized employment with skills training - will be encouraged to attend programs
offered through WIOA American Job Centers.

(c) Location and Population Served, including Equitable Distribution
(1) A description of the localities and populations for which projects of the type authorized by
title V are most needed. (20 CFR 641.325 (d))

Rhode Island residents 55 and older (older residents) account for 28.1 percent of the state’s
population. Of the state’s population for whom poverty status is determined, 14.2 percent are
living in poverty (100% or below poverty level) and 18.5 percent are living in or near poverty
levels (125% or below poverty level). Older residents are less likely to be living at or near
poverty levels than the population as a whole as 9.6 percent of those aged 55+ for whom
poverty status is determined are living in poverty and 13.6 percent are living in or near poverty
levels. Providence County has the greatest number of older residents living in or near poverty
levels on both a numeric and percentage basis. A total of 19,263 Providence County residents
55 or older are living in poverty accounting for 12.3 percent of the county’s older population
and 27,056 are living in or near poverty levels accounting for 17.3 percent of the county’s older
population. In Kent County a total of 3,556 older residents are living in poverty accounting for 7.1% of the county’s older population and 5,191 older residents are living in or near poverty levels accounting for 10.4% percent of the county’s older population.

In Bristol County a total of 879 older residents are living in poverty accounting for 5.8% percent of the county’s older population and 1,382 are living in or near poverty levels accounting for 9.1% percent of the county’s older population. Within Providence County seven cities and towns have more than 1,000 older residents living in or near poverty levels, including Providence (8,435), Pawtucket (4,291), Cranston (2,922), East Providence (1,814), Woonsocket (2,415), North Providence (1,542) and Johnston (1,237). Warwick (2,675), Coventry (1,094) and West Warwick (1,092), located in Kent County, are the only other Rhode Island cities or towns with more than 1,000 older residents living in or near poverty levels. On a percentage basis, the cities of Central Falls (32.9%), Providence (27.7%), Pawtucket (24.9%) and Woonsocket (24.0%), all located in Providence County, have the greatest share of older residents living in or near poverty levels. Demographic data for all individuals living at the poverty level, which accounts for over threequarters of all those living in or near poverty levels, shows that women, both older and total population, are more likely to be living in poverty than men of the same age group. Older women account for 63.9 percent of the older residents living at the poverty level, with older men accounting for 36.1 percent. Likewise, minority residents 55 and older are more likely to be living in poverty than the non-minority residents 55 and older, defined as a person whom is both white and non-Hispanic. There are 8,148 minority residents 55 and older living in poverty. They account for 24.4 percent of Rhode Island’s older minority population (33,330). There are 21,611 non-minority residents 55 and older living in poverty. They account for 8.2 percent of Rhode Island’s older non-minority population (262,029). However, older minority residents living in poverty numbering 8,148 account for 31.3 percent of the 26,043 older RI residents living in poverty and older non-minority residents numbering 21,611 account for 83 percent of the older RI residents living in poverty.

(2) List the cities and counties where the project will be conducted. Include the number of SCSEP authorized positions and indicate where the positions changed from the prior year.

In Rhode Island the SCSEP equitable distribution consists of five slots in Bristol County; five slots in Kent County; and thirty-one (21) slots in Providence County. Cities located in Bristol County include Barrington, Bristol, and Warren. Cities located in Kent County include Coventry, East Greenwich, Warwick, West Greenwich, and West Warwick. Cities located in Providence County include Burrillville, Central Falls, Cranston, Cumberland, East Providence, Foster, Gloucester, Johnston, Lincoln, North Providence, North Smithfield, Pawtucket, Providence, Scituate, Smithfield, and Woonsocket. The SCSEP project will take place in each of these three counties and the cities or towns that comprise those counties.
(3) Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.

As of Program Year 2019 Quarter 3, RI SCSEP equitable distribution data indicates that of the 44 authorized slots (unmodified) Kent County is under-enrolled by 3 slots; Bristol County is under-enrolled by 6 slots; and Providence County is under-enrolled by 19 slots. RI SCSEP is unable to enroll at capacity in all counties due following the requirement in the federal regulations of paying participates the highest applicable required wage for time spent in orientation, training and community service assignments, which is the prevailing rate of pay for persons employed in similar public occupations by the same employer. RI SCSEP participants earn wages ranging from $11.50-$14.00 per hour. The state’s slots for enrollment are based on participants receiving minimum wage and therefore enrolling all authorized slots would cause the funding to be expended at a quicker rate. This would cause RI SCSEP to place individuals on a leave without pay from the program when funding has been expended. RI SCSEP actively pursues employment for participants in order to then enroll new individuals in the counties that are most underserved. RI SCSEP employment strategy will include continued efforts to engage local businesses, churches, and agencies/centers that are willing to hire older individuals at a pay that allows for self-sufficiency. We recognize the importance of maintaining equitable distribution among the counties we serve and will remain diligent and aggressive with quickly training individuals for unsubsidized employment to allow for continued enrollment in the counties.

(4) The State’s long-term strategy for achieving an equitable distribution of SCSEP positions within the State that:

   (A) Moves positions from over-served to underserved locations within the State in compliance with 20 CFR 641.365.

RI SCSEP strives to provide equitable access to the program in accordance with the percentages of program-eligible residents’ three counties. When there are changes to the ratios, authorizations will be redistributed among the three counties based on the new equitable distribution -- increasing positions where needed and decreasing training slots in over-served counties. However, current participants will not be impacted by any reallocations. RI SCSEP will work with the RI National Grantee to ensure equitable distribution of slots in all counties of Rhode Island to minimize over-serving or underserving locations. If the scenario arises that positions must be transferred to address over-serving or underserving locations, RI SCSEP will ensure to adhere to CFR 641.365 by communicating with the National Grantee, USDOL, and the Federal Project Officer. RI SCSEP will ensure all participants and host agencies are kept informed of the changes.
(B) Equitably serves rural and urban areas.

Bristol County, Kent County and Providence County are considered urban areas. Within those counties, and according to the SCSEP final rule where rural is defined as “areas not designated as a metropolitan statistical area by the Census Bureau; segments within metropolitan counties identified by codes 4 through 10 in the Rural Urban Commuting Area (RUCA) system; and RUCA codes 2 and 3 for census tracts that are larger than 400 square miles and have populations density of less than 30 people per square mile”, there do not exist any communities that are considered rural communities. Again, training authorizations will follow the equitable distribution percentage for each County.

(C) Serves individuals afforded priority for service under 20 CFR 641.520. (20 CFR 641.302(a), 641.365, 641.520)

In selecting eligible individuals for participation in the SCSEP, priority is given to individuals who have one or more of the following characteristics as defined in the Older Americans Act section 518(b) (1)-(2) and by the Jobs for Veterans Act: covered persons in accordance with the Jobs for Veterans Act; 65 years of age or older; have a disability; have limited English proficiency or low literacy skills; reside in a rural area; have low employment prospects; have failed to find employment after using services provided through the One-Stop delivery system; or are homeless or are at risk of homelessness.

To assist employment counselors in prioritizing participants with significant barriers to employment, DLT utilizes a multifaceted approach to reach the hardest to serve. DLT assesses and reassesses participants via a face to face interview, facilitated by the case manager. The assessment covers previous employment history and transferable skills; strengths and barriers; interests and hobbies; educational level; and previous training. DLT also utilizes a variety of contacts to recruit those individuals and these contacts include Senior Centers; Churches and Faith Based Organizations; Homeless Shelters; Veteran’s Organizations; Community Food Banks. Within all enrollment priorities those with poor employment prospects are given preference. These are individuals who are unable to obtain employment without the assistance of SCSEP or other employment and training programs. Those included in this category are individuals who have limited or no work histories; are basic skills deficient; have limited English language proficiency; are displaced homemakers; are disabled; are homeless. The Program views the distribution of priority individuals across the State as being in line with the equitable distribution of program-eligible individuals across the three counties.
RI has one SCSEP Grantee who serves three Counties per the SCSEP equitable distribution as provided by the U.S. Department of Labor, which identifies each county’s percentage of the state’s program-eligible population. In 2014, out of a Rhode Island civilian labor force of 565,123 (those aged 16 and older) who were either working or actively seeking employment, 21.7%, or 122,783, were aged 55 and older. 97.2% of Rhode Islanders aged 55 and older have had their poverty levels determined. Of those individuals, 9.6% are below the poverty level.

US Census Bureau estimates a 2014 total population for the State of RI at 1,053,252. Of Rhode Island’s 862,851 working age (16+) residents, approximately 296,115 (34.3%) were aged 55 and older in 2014. Broken down by county, the 16+ populations (and corresponding distributions) of those over age 55 are as follows: Bristol County 40,776 (38.8%); Kent County 136,492 (37.5%); and, Providence County 510,822 (31.7%). This population distribution generally corresponds to the percentage of program-eligible Rhode Islanders in each county. Specifically, the three counties are allocated positions and funding based on the Equitable Distribution ratios that are in effect for each grant year (as identified by the U.S. Department of Labor). The ratios for the PY 2015 grant year are Bristol County 10%, Kent County 21%, and Providence County 69%.

For those participants facing the greatest economic need RI SCSEP’s partnership with local homeless shelters, food banks and other community agencies serving economically depressed mature individuals has led to the SCSEP program being able to serve the majority of participants who are at or below 100 percent of the Federal Poverty Level at the time of enrollment. Greatest social need and individuals described in “priority of service”. The RI SCSEP reaches out to local minority communities through churches, schools and community networking to provide services to and engagement of disparate groups in all local service areas resulting in a consistently “meets or exceeds the performance” on the most-in-need measure.

In RI, minority residents 55 and older are more likely to be living in poverty than the non-minority residents 55 or older, minority being defined as not white non-Hispanic. There are 8,148 minority residents 55 and older living in poverty. They account for 24.4 percent of Rhode Island’s older minority population (33,330) for whom poverty status has been determined.
There are 21,611 non-minority residents 55 and older living in poverty. They account for 8.2 percent of Rhode Island’s older non-minority population (262,029) for whom poverty status has been determined. However, older minority residents numbering 8,148 account for 24.4 percent of the 33,330 older RI residents living in poverty and older non-minority residents numbering 19,419 account for 75.6 percent of the older RI residents living in poverty. RI SCSEP active participants are comprised of 47% minorities which is nearly double the ratio of minority versus non-minorities in RI.

(D) Are limited English proficient.

One of the fastest-growing segments of the Rhode Island labor force, adult English language learners face a number of barriers to employment. According to US Census data, nearly one quarter of Rhode Islanders spoke a language other than English at home, and over 13% of the total state population was foreign born. RI SCSEP currently serves 17% limited English proficient participants and has consistently met that need for eligible SCSEP participants in RI.

(E) Have the greatest social need. (20 CFR 641.325(b))

Greatest social need means the need caused by non-economic factors, which include: Physical and mental disabilities; language barriers; and cultural, social, or geographical isolation, including isolation caused by racial or ethnic status, which restricts the ability of an individual to perform normal daily tasks or threatens the capacity of the individual to live independently. (42 U.S.C. 3002(24)). According to the U.S. Census Bureau, of the 88,385 individuals aged 18-64 living below poverty, 25.8% have disabilities, while 74.2% do not. However, of the 77,086 individuals aged 18-64 with disabilities, 29.6% live below poverty, while 11.6% of the 566,336 18-64 years old without disabilities live below poverty. Additionally, individuals with disabilities aged 18-64 have an unemployment rate 13.6 percentage points higher than those without disabilities. As mentioned above, English proficiency is also a barrier to employment, however with the small geographic area involved with the state of RI, geographic isolation is not a major barrier. 11.8% of all Rhode Islander’s aged 18-64 have a disability and RI SCSEP participants are comprised of 23% disabled enrollees.

(7) A description of the steps taken to avoid disruptions to the greatest extent possible, when positions are redistributed, as provided in 20 CFR 641.365; when new Census or other reliable data become available; or when there is over-enrollment for any other reason. (20 CFR 641.325(i), 641.302(b))

If positions are required to be redistributed, RIDLT will ensure clear communication and coordination with Host Agencies, participants, the Federal Project Officer, and USDOL. Any positions that require movement will be coordinated with and approved by the Federal Project Officer. RIDLT will work with participants and host agencies to ensure a seamless transition as to not disrupt participant wages or interfere with the participants individual employment plan.
Appendix 1. Performance Goals for the Core Programs

To be completed upon submission of state plan.