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Governor – State of Rhode Island

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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Overview

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

Options for Submitting a State Plan

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

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

Alternatively, a State may submit a Combined State Plan that meets the requirements described in this document and outlines a four-year strategy for WIOA's core programs plus

one or more of the Combined State Plan partner programs. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. If included, Combined State Plan partner programs are subject to the "common planning elements" (Sections II-IV of this document) where specified, as well as the program-specific requirements for that program where such planning requirements exist separately for the program. The Combined State Plan partner programs are—

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.)
- Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers programs (Activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)
- Unemployment Insurance programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)) [1]
- Reintegration of Ex-Offenders program (programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

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

Development that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

How State Plan Requirements Are Organized

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

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

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.[2] States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations.

Paperwork Reduction Act: The Paperwork Reduction Act of 1995 (PRA) provides that an agency may not conduct, and no person is required to respond to, a collection of information unless it displays a valid OMB control number. Public reporting burden for this information collection is estimated to be 86 hours per state; including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Responding to this collection is required to obtain or retain the Federal grant benefit. In addition, responses to this information collection are public, and the agencies offer no assurances of

confidentiality. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Office of Workforce Investment, and reference OMB control number 1205-0522. Note: Please do not return the completed plan to this address.

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

I. WIOA State Plan Type and Executive Summary

a. WIOA State Plan Type

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

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

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

This is a combined plan

Combined Plan Partner Program(s)

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

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

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

No

b. Plan Introduction or Executive Summary

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

Rhode Island's 2020 Workforce Innovation and Opportunity Act Combined State Plan is designed to provide a vision of the Governor's integration of workforce, education and economic development policy while also serving as a federal compliance document for the United States Departments of Labor and Education under the federal Workforce Innovation and Opportunity Act (WIOA). The Combined State Plan outlines the vision, principles and goals that will guide workforce, education and training programs in the state of Rhode Island.

State Workforce System: The Governor, the State Workforce Innovation Board (the Governor's Workforce Board) and WIOA core partners including the Department of Labor and Training, the Department of Education, and the Department of Human Services collaborated on the development of the plan. The state developed this Combined State Plan with the intent to integrate the programs listed below (including the non-core programs) into the strategies outlined in the Plan.

- Rhode Island Department of Labor and Training
    - Adult (Title I);
    - Dislocated Worker (Title I);
    - Youth (Title I);
    - Wagner-Peyser (Wagner-Peyser Act, as amended by Title III)
    - 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)
- Rhode Island Department of Education
    - Adult Education and Family Literacy (WIOA Title II)
    - Carl D. Perkins Career and Technical Education
- Rhode Island Department of Human Services
    - Temporary Assistance for Needy Families (TANF) Program (42 U.S.C.);
    - Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV)

Vision Statement: 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.

Guiding Principles: The WIOA partners will work toward achieving the above vision using these principles as guideposts for policy development and program service delivery. Each partner will use its resources to support the following principles:

- Continuing the evolution of the workforce development system around a demand-driven and industry sector-based strategy
- Better integrating federal funding and programs available within WIOA to advance state priorities and strategies
- Better aligning the support service network (including policies, rules, and procedures) to maximize resources and build a ladder/pathway to employment for all
- Better integrating data systems
- Reimagining the One Stop Career Centers around the needs of the customer, not the needs of government programs
- Prioritizing the following initiatives;
    - Improving community engagement, cultural competency, and client experience
    - Participating in the development of a statewide e-referral system
    - Supporting the establishment of a Community of Practice systemwide around matters such as work readiness and career counseling,
    - Providing better clarity around the impact of employment and earnings on public services and the 'benefits cliff'
    - Continuing to promote partnership with employers and industry in the development of workforce education and training program

State Goals and Strategies: The partners will collectively use the following strategies to support Rhode Island's vision of an integrated and effective education, workforce and job training system at the state and local level:

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 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 (childcare, transportation, work-related clothing, etc.) 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 the physical appearance and layout 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.

II. Strategic Elements

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

a. Economic, Workforce, and Workforce Development Activities Analysis

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

1. Economic and Workforce Analysis

A. Economic Analysis

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

i. Existing Demand Industry Sectors and Occupations

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

ii. Emerging Demand Industry Sectors and Occupations

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

iii. Employers' Employment Needs

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

i. Existing Demand Industry Sectors and Occupations

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.

Rhode Island Establishment Employment - Seasonally Adjusted - Dec 2019

Rhode Island Establishment Employment	
Seasonally Adjusted - Dec 2019	
Total Nonfarm	**506.3**
Total Private	**444.8**
Education & Health Services	110.6
Trade, Transportation & Utilities	80.2
Professional & Business Services	69.5
Government	61.5
Leisure & Hospitality	60.3
Manufacturing	39.2
Financial Activities	35.9
Other Services	23.5
Construction	19.2
Information	6.2
Mining & Logging	0.2

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.

State Occupational Employment and Wage Estimates- Rhode Island

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

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

Source: Occupational Employment Statistics Program, USDOL

ii. Emerging Demand Industry Sectors and Occupation

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.

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

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:

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

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:
https://cew.georgetown.edu/wpcontent/uploads/2014/11/Recovery2020.SR_.Web_.pdf
http://www.dlt.ri.gov/lmi/oes/majorocc.htm
http://livingwage.mit.edu/states/44
http://strongernation.luminafoundation.org/report/2019/#nation

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

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

iii. Employers' Employment Needs

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[4]. This population must include individuals with disabilities among other groups[5] in the State and across regions identified by the State. This includes—

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

[5] Veterans, unemployed workers, and youth, and others that the State may identify.

i. Employment and Unemployment

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

ii. Labor Market Trends

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

iii. Education and Skill Levels of the Workforce

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

iv. Skill Gaps

Describe apparent 'skill gaps'.

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 individuals' 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.

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%.

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.

As of December 2019, Rhode Island's poverty rate was 12.9%, representing 131,383 Rhode Islanders. The rate of poverty for children under 18 was even higher at 16.6%, representing over 34,000 children. 47,700 households (11% of households) reported being Food Insecure, with 20,400 households (4.7%) reporting very low food security.

In December 2019, a total of 2579 adult participants were assisted through TANF, of which 90% were females and 10% were males. According to the DHS, the average monthly number of recipients for 2019 in Rhode Island was 9,321, down from 9831 participants in 2018. A total of 592 participants were within 2 years of exhausting lifetime eligibility under the TANF program. Among the 2388 adult participants were assisted through TANF; 675 had less than a high school degree, 1012 had a high school degree or GED, 498 had some college and there were 394 that were unverified.

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/) 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.

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 or 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."

Source:https://www.prnewswire.com/news-releases/respectability-presents-report-best-and-worst-states-on-jobs-for-people-with-disabilities-300796685.html

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 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 traditional 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

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 . 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 Bachelors; 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 Science, Technology, Engineering, the Arts and Mathematics (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 systems 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:

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https://www.cs4ri.org/
https://www.prepare-ri.org/

iv. 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.

Occupation Title	EmployRI Postings	UI Claimants	Claimants per Posting	Education
Secretaries & Administrative Assistants	8	74	9.3	High School/GED
Packers & Packagers, Hand	8	72	9.0	Less than HS
Carpenters	7	51	7.3	High School/GED
Construction Laborers	6	30	5.0	Less than HS

Medical Secretaries	15	64	4.3	High School/GED
Team Assemblers	11	44	4.0	High School/GED
Sales Reps., Wholesale & Mfg, Except Technical & Scientific	11	40	3.6	High School/GED
Office Clerks, General	17	46	2.7	High School/GED
Supervisors of Office & Administrative Support Workers	41	69	1.7	High School/GED
Billing & Posting Clerks	21	33	1.6	High School/GED

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.

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

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 (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of—

A. The State's Workforce Development Activities

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

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

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

B. The Strengths and Weaknesses of Workforce Development Activities

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

C. State Workforce Development Capacity

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

The State's Workforce Development Activities

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.

State Agency WIOA Program Responsibility

State Agency WIOA Program Responsibility		
Agency	**Core Program**	**Non-Core Program**
DLT	Adult (Title I); Dislocated Worker (Title I); Youth (Title I); Wagner-Peyser (Wagner-Peyser Act, as amended by Title III)	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)
RIDE	Adult Education and Family Literacy (WIOA Title II)	Carl D. Perkins Career and Technical Education
DHS	Temporary Assistance for Needy Families (TANF) Program (42 U.S.C.); Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV)	

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 though 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 access information and resources regarding the state WIOA network in one location.

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. 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 ot 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.

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.

<u>Associate Programs – Other Agencies</u>

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 the 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.

The Strengths and Weaknesses of Workforce Development Activities

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.

State Workforce Development Capacity

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.

2. Goals

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

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

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

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

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

3. Performance Goals

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

4. Assessment

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

1. Vision

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

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 and digital literacy, 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

Included in appendices.

4. Assessment

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)

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)

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. The state is also considering a technology solution to more effectively share information about upcoming training opportunities, eligibility requirements, and training prerequisites with community, agency, and other service partners to better connect more Rhode Islanders with these programs.

Rhode Island will also endeavor to help transition many of our sector partners to reach the 'next level' in their scale and capacity and became 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, digital literacy, 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 it 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 provides 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 aides 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 supports model is fluid. Meeting client needs is not something that is sequential; and 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 and career service needs are often simultaneous.

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 councilor 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.

Integrated Digital Literacy

To keep up with the demands and expectations of the 21st century job market, it is essential that all job seekers have at least some form of digital literacy and/or comfort with digital technology. Digital literacy is defined as "the ability to use information and communication technologies to find, evaluate, create, and communicate information, requiring both cognitive and technical skills." Digital literacy results in a variety of skills including critical thinking and analysis of digital information; the ability to use digital tools to design and create content; and the ability to use digital tools to access, use and share information. Digitally literate students are more confident using digital content and tools in their learning and in the workplace.

Effective development of digital literacy skills requires repeated instruction, frequent guidance, and scaffolded practice. For this reason, this strategic plan prioritizes inclusion and integration of digital literacy skills training in education and training programs across WIOA plan partners. A priority for all partners will be to identify where within their respective programs digital literacy instruction can best be integrated and accessed, in a manner that is aligned and coordinated with the rest of the workforce network.

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 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 said 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.

COVID-19

On January 30, 2020 the outbreak of COVID-19 (coronavirus) was declared a Public Health Emergency of International Concern by the World Health Organization. On March 11, 2020, the World Health Organization announced that the COVID-19 outbreak can be characterized as a pandemic. As of final submission of this plan, Rhode Island, along with the rest of the United States, is still in the early stages of our response to this outbreak; however, the immediate economic impact of the coronavirus is already being felt. In the two-week period from March 9, 2020 to March 23, 2020; Rhode Island received more than 48,600 claims for unemployment benefits related to COVID-19, by comparison, the state received around 11,600 claims in the entire month of January 2020.

The full impact of the outbreak on the state's economic and employment picture may not be clear for months, or even longer. However, Rhode Island is keenly aware of how important the WIOA network will be in aiding the response and advancing the recovery related to this crisis. In the near term, our collective focus will be on helping those impacted by the outbreak receive the financial assistance and support services they need; while at the same time offering training and other appropriate services to those employers and industries that are critical to the state's response. When the state turns to recovery, the industry partnership network will be a critical asset as we work with employers to quickly train and place unemployed Rhode Islanders with new or returning employment opportunities. In all instances, WIOA partners will work in concert with the Department of

Health and other relevant agencies to make sure our efforts are consistent with the state's strategy for containing the spread of COVID-19. The health and safety of staff, clients, and the public will be a paramount concern.

The fundamentals of our approach are captured in this plan and remain unchanged; however, the immediate priority will be aiding the response and assisting the recovery relating to the COVID-19 pandemic.

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 perfect (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.

Strategies

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 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 an analysis of the customer flow and client experience within the centers themselves. 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, assuring 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 purse 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 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 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.

Rhode Island strives to provide consistent high-quality service to workforce development customers across the state. As described in the state strategy section, Rhode Island seeks to develop a Community of Practice that would establish uniform statewide definitions and standards of quality for the workforce network. In addition to ensuring a level of consistency across regions, these uniform standards and definitions will also support alignment of services across programs by increasing interoperability and forging a common 'language' around customer information.

Furthermore, the State Workforce Development Board intends to explore the potential development and installation of an application programming interface (API) that would allow for back-end communication and interoperability of the various data and MIS systems being utilized among program partners. Such a solution would allow client information to be quickly and securely shared among partner programs, improving the customer service experience by eliminating duplicate processes and questions while simplifying administration, intake, and referral.

Trained and well informed staff is another critical element to providing comprehensive, high-quality service. An expanded curriculum of training, technical courses, and workshops help to enhance the knowledge, skills and the professional development of workforce professionals in One Stop centers, LWDBs and partnering agencies and promote a collaborative and consistent service delivery through information exchange and learning. The state also recognizes the critical need to provide supportive services to customers, particularly those with barriers to employment, in order to promote successful outcomes. While many of these supportive services can be provided by the core programs, local boards are encouraged to secure other services through partner programs and community organizations based on local needs.

A particular focus that is shared across all program partners is better linkages and connections with mental health and substance abuse treatment providers. Rhode Island recently launched 'BHLInk' – a web-based, phone-based, and in-person support service that provides immediate counseling, treatment, and recovery services, as well as connections to long-term treatment options - 24 hours a day, 7 days a week. Connections and referrals to BHLink are a priority for all plan programs and BHLink has been working with LWDA and One Stop Managers on enhanced presence and visibility in state One Stop Career Centers.
At present, each partner program endeavors to provide necessary supportive services as seamlessly as possible. Examples include:

For participants determined to be eligible under WIOA's Title I core programs - Title I Adult and Dislocated Worker funds allow local areas to provide supportive services while Title I Youth providers offer supportive services based on findings from needs assessments. Referrals and/or assistance with transportation, housing, and childcare can found at all One Stop Centers and may also be leveraged from TANF and SNAP Employment and Training programs.

Case management in Title II adult basic education programs connects adult learners with other supports, including resources to address basic needs insecurity and other barriers to enrollment and persistence in adult basic education programming, as well as services to support transition to employment and/or postsecondary education and training.
In providing Title IV Vocational Rehabilitation programming, ORS works with local, community rehabilitation providers on a fee for service basis to ensure that extended services are available to individuals with the most significant disabilities who require supported employment

TANF has a range of programs and activities for supportive services that help parents address the specific barriers preventing them from gaining long term employment. Supportive Services are key to developing employment plans with long terms goals for each of the TANF families. Such supports are separated into cash assistance or programs like child care, SNAP, bus passes and transportation allowances. A second group of more intensive supports focus on challenges such as housing needs, substance abuse, help for those experiencing domestic violence, and mental health and physical health services .

D. Coordination, Alignment and Provision of Services to Employers

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

Employer 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 to 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.

Title I programming, as well as other partner programs administered by the Department of Labor and Training including TAA, SCSEP, and JVSG, have a history of coordinated services for employers due to their organizational linkages to the Employer Services staff and, by extension, the Department of Commerce. These linkages have been strengthened over the past few years to maximize the benefits of a demand-driven system to these programs, while increasing the potential referral and recruitment pool for the Employer Services staff to satisfy demand. Title I programming has also begun to connect with and leverage the knowledge and network of the state's Industry Sector Workforce Partnerships funded through the Real Jobs RI program.

RI's Title II program is a key partner in upskilling the state's workforce. RI Department of Education (RIDE) has increased its focus on meeting the needs of the workforce by encouraging local providers to develop services responsive to employer demand and to align programming with opportunities for transitions to workforce and postsecondary. As stated in the most recent RFP for AEFLA providers, RIDE recognizes that adult education services should be "responsive to both each individual student's needs while also ultimately positioning them for jobs that meet employers' demands." Accordingly, RIDE incentivizes partnerships between adult education providers, postsecondary institutions, and industry/business partners, as well as the implementation of Integrated Education and Training (IET) models to ensure adults receive the skills and credentials needed for available, in-demand jobs.

The Office of Rehabilitation Services strives to streamline and improve the employment experience by connecting employers with a designated liaison staff member responsible for coordinating program support, including pre-screened individual recruitment and onboarding to ensure placement and retention success. ORS has also promoted successful employer-led training and education models such as Project Search, along with other employer-informed and industry-driven solutions to meet individual needs.

While the above efforts are effective in addressing the needs of employers, all programs struggle to develop enough consistent employer connections to generate continuous 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.

By managing employer engagement through designated lead agency, employer and industry relationships can be better managed and coordinated, and program partners can avoid duplicative efforts. There are several ways that WIOA plan partners can engage with and through the lead agency on employer engagement strategies:

- Partner programs can solicit industry intelligence and feedback to help better inform program design and delivery through the designated agency instead of reaching out to employers themselves. Previously some employers reported confusion, or downright exhaustion, when being invited to multiple 'roundtables' or 'industry listening sessions'. A designated engagement lead can better manage employer and industry time commitments while helping the partner agency better refine and define 'the ask' and produce more fruitful and actionable information from employer partners

- Employer or industry specific hiring opportunities can be effectively communicated through the designated agency to the WIOA partners. Employer and industry partners report that they prefer and appreciate a single-point-of-contact with whom they have built trust and a relationship. These relationships become an asset to the WIOA partner program and the designated agency identifies available employment positions and training needs, and distributes them to WIOA partners.
- The designated lead agency can help network and facilitate project-based relationships between employer and industry partners and WIOA plan partners. As opportunities for formula or grant funded activities come about, the designated lead agency assists by bringing the right partners to the table, prompting initial conversations and introductions, then aiding the development process to increase the likelihood of success

Lastly, WIOA partners can take advantage of the industry knowledge base and program experience that the designated agency has built. While employer and industry partners may change frequently as internal points of contact change or company plans shift, the designated agency helps to 'house' knowledge, experience, and history that can inform future program design and service delivery.

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 to 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 results 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—

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.

Employ RI 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

Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers.[10]

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.

RIDE uses a student data management information and accountability system that meets federal WIOA reporting requirements for Title II, AEFLA. The system provides RIDE and local providers with data collection measures that meet the standards of the National Reporting System for Adult Education. The system is web-based and provides immediate access to current and historical performance and outcome data. In addition to the required NRS tables, the system has customized reports to assist local providers with monitoring operations and performance measures. RIDE uses the data system to conduct regular desk audits and performance reviews of grantee providers, as well as to prepare reports on the WIOA indicators of performance for annual federal reporting processes.

The TANF program has vendors located at each One Stop locations across RI. These vendors utilize the statewide data warehouse processed by Power BI for RI Works monthly dashboards. This system provides DHS with over 60 data elements per parent monthly. The data analytics collected from vendors feeds back to the Department of Human Services and is analyzed via dashboards for program and performance review. The RIBridges eligibility system interfaces with both state and federal organizations, as required by regulation and both DLT and DHS are in the early stages of allowing backend integration of our data systems that would, initially, query aggregate client participation or eligibility and, eventually, allow for seamless client data transfer to improve interprogram referrals.

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 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.

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.

Organizational charts for each agency administering Core and Non-Core Programs have been provided.

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.

State Agency WIOA Program Responsibility		
Agency	**Core Program**	**Non-Core Program**
DLT	Adult (Title I); Dislocated Worker (Title I); Youth (Title I); Wagner-Peyser (Wagner-Peyser Act, as amended by Title III)	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)
RIDE	Adult Education and Family Literacy (WIOA Title II)	Carl D. Perkins Career and Technical Education
DHS	Temporary Assistance for Needy Families (TANF) Program (42 U.S.C.); Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV)	

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 required 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 providers - of which the state has fourteen.

The Department of Education funds numerous adult basic education programs, including but not limited to the Providence Public Library 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.

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.

Codified in state statute as the state's primary policy-making body on all workforce development matters, the State Workforce Development 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). To elevate the influence and profile of the Board, the state legislature elected to include Department Directors and other cabinet-level staff as required appointments to the board, meeting federal membership requirements while also considering important state-level considerations such as geographic, gender, and racial/ethnic diversity as well as the inclusion of persons with disabilities. Owing to the state's small size and the organizational structure of Rhode Island state agencies, the Department Directors appointed to the Board each have direct policymaking authority for the core and noncore WIOA programs under their purview.

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 [Adult; Dislocated Worker; Youth; Wagner-Peyser; Trade Adjustment Assistance for Workers Program; Jobs for Veterans State Grants; Migrant and Seasonal Farmworker Program; Senior Community Service Employment Program]
Julian Alssid, Community College of Rhode Island
Angelica Infante-Green, Department of Elementary and Secondary Education [Adult Education and Family Literacy; Carl D. Perkins Career and Technical Education]
Courtney Hawkins, Department of Human Services [Vocational Rehabilitation; Temporary Assistance for Needy Families

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 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 decision-makers 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 though 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.

RIDE's evaluations of Title II programming primarily focus on enrollment and measurable skill gains at the local program and state levels. In recent years, Title II has enrolled nearly 6,000 adult learners per year, with the majority of learners enrolling in ESL services. Over the past two complete program years, Title II enrollment increased from 5,520 in 2017-2018 to 5,942 in 2018-2019. The percentage of learners achieving an MSG also increased, from 52.80% in 2017-2018 to 53.48% in 2018-2019, exceeding federally negotiated targets both years. In the Primary Indicators of Performance, RI demonstrated marked improvement in the percentage of participants who attain a Secondary School Diploma or Equivalent and enter employment within a year after exit (14.56% in 2017-2018, compared to 21.76% in 2018-2019). While RI title II was in the second or top quartile among states nationally for ABE, ESL, and overall MSG rates in 2018-2019, it was in the third or bottom quartile for three Primary Indicators of Performance related to employment and credentialing rate after

exit. Accordingly, RIDE is adapting its strategies in local program support, data collection, and reporting to focus on program quality and effectiveness in employment and postsecondary transitions, and on capturing these outcomes for title II participants.

In 2018, the Rehabilitation Services Administration conducted an on-site review of the VR program including fiscal and Services for the Blind. In 2019, the report was completed and utilized evaluations of data and qualitative information to measure the effectiveness of our program. There were findings that ORS is working with RSA on to address. In addition, ORS also has a Continuous Quality Improvement Committee that works cross-agency that evaluates areas in the VR program that require system changes due to WIOA. Evaluations completed in the last two years have resulted in such things as an expansion in Pre-employment Transition Services, the development of a Business Engagement Team to ensure better partnerships with employers, training to help staff move clients into eligibility and plan faster, trainings on common performance measures and measurable skills gains. ORS also worked with Behavioral Health Developmental Disabilities and Hospitals to complete the first round of joint SE – QI Site Visits as part of the DOJ Consent Decree. ORS also has worked with DLT, BHDDH and DHS on a cross disability employment initiative called Let's Get to Work Initiative that will by design increase collaborative efforts by State Parties to engage with all individuals with disabilities seeking employment.

Since March 2018, TANF uses monthly evaluations of data and qualitative information to measure the effectiveness of the program for our parents. Recent evaluations have conducted by the firm Change and Innovation as well as the Harvard Kennedy School, Government Performance Lab. In the past few years, these evaluations molded the RI Works program into a client centered, data driven network of vendors innovating for a hard to serve population in RI. Assessment-informed Changes have included adding a Supportive Service component for RI Works parents to receive wrap around services to mitigate the barriers preventing long term employment. The ongoing data received from the network of service providers allows the Department to react to changes quickly, identify programs that are successful and share their resources across multiple vendors. DHS is also engaging with the ACF-led 'Whole Family Approach to Jobs' initiative to align policy, regulations, and implementation with the family's needs first, embedding their voices into the decision making process.

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.

Perhaps the most effective evaluation tool that the state will have available, upon its completion, is the RI Talent Dashboard. Leveraging Rhode Island's longterm investment in a robust and comprehensive Longitudinal Data System, the Talent Dashboard will be Rhode Island's public transparency portal for measuring statewide progress towards meeting the state's goals in key areas of education and workforce development. Measures will not only include important indicators as graduation rates, math proficiency, post-secondary enrollment, completion rates and employment and wage outcomes for workforce training participants; but will go beyond these static figures to establish the true impact of the state's investments. For example, using deidentified employment and outcome data, the dashboard will be able to determine the aggregate impact that workforce programing has on an individual's economic status by querying employment and earnings several quarters before enrollment, and multiple quarters after completion. This 'delta' or difference in economic circumstance helps to illustrate the real impact of workforce and education programming while putting different programs within the workforce network on the same 'footing' from an analysis perspective. Collectively assessing the long-term trajectory of Rhode Islanders as they move through the public system continuum, will assist policy makers and key stakeholders ensure Rhode Islanders have the skills they need to compete for good jobs now, and in the future.

The Dashboard will be built on the foundation of Rhode Island's already existing public data analysis and evaluation tool; the RI Data Hub. As the state's dedicated Longitudinal Data System, the Data Hub already securely integrates data from several of the WIOA core programs, and has the ability to integrate others. Multiple WIOA core and non-core programs are integrated into the Hub, including:

DLT

- Adult
- Dislocated Worker
- Youth
- Wagner-Peyser
- Trade Adjustment Assistance

RIDE

- Adult Education and Family Literacy
- Carl D. Perkins Career and Technical Education

In 2016, the DataHub evaluated the impact of the state's Adult Education and Family Literacy investments, (http://ridatahub.org/datastories/adulted-outcome/1/) finding:

"It is clear that RI's public adult education system delivers on its promise to provide its learners with the skills they need to obtain jobs and improve their employment situation. Those who have completed coursework in the system retain and obtain jobs at respectable rates. They may enter the world of work for the first time, or for those already working, shift into industries with higher-skill, higher paying jobs. Perhaps most crucially, they earn higher wages after their adult education experience. They are thus better-able to provide for themselves and their families, advance their job prospects, and contribute to the general welfare of society."

In 2018, researchers from the Harvard Kennedy School of Government utilized the DataHub to create a draft Evaluation System for Rhode Island's Carl D. Perkins Career and Technical Education (CTE) Programs that is under consideration by the state. (http://ridatahub.org/media/datamart_reports/CTE_Accountability_Report_FINAL.pdf)

All of these evaluation tools will not only inform key policy and decision-makers, but will be made available to the public as well to apprise them of the impact of performance of the state education and workforce development network.

5. Distribution of Funds for Core Programs

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

A. For Title I Programs

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

i. Youth Activities in Accordance with WIOA Section 128(b)(2) or (b)(3)

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 state then assigns the following weights to the remaining factors

- Insured unemployment data 30%
- Unemployment Concentrations 30%
- Plant closings and mass layoff data 20%
- Declining industries data 10%
- Long-term unemployment data 10%

A hold harmless provision (establishing a 90% minimum of the previous two-year average share of the state allotment) 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. 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 Rhode Island Department of Education will award competitive grants to eligible providers on a 3-year cycle in accordance with the requirements of section 231 of WIOA and in compliance with 34 CFR Part 463. Eligible Title II provider applicants will be required to demonstrate effectiveness. 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).

The competitive application process will be conducted in an open and transparent manner.

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

- A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;
- A description of how the eligible provider will provide services in a manner that meets the needs of eligible individuals; and
- Any information that addresses the 13 considerations described under section 231(e), as applicable.

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

Please refer to section 1.

C. Vocational Rehabilitation Program

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

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 has just completed the procurement process to identify a data system vendor for the contract beginning in PY 2020-2021. 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.

RIDE's RFP for an NRS-compliant data system contract beginning in PY 2020-21 specified that any vendor have the capacity to communicate with other state data systems via APIs, including those belonging to other WIOA core partners, in order to facilitate streamlined intake and service deliver across all agencies. RIDE has just finalized this procurement process. As the data system provider for more than 20 other states with more than 14 years' experience, the successful vendor has deep WIOA expertise, and meets all requirements, policies, and security procedures specified by the National Reporting System (NRS) and the Office of Career, Technical, and Adult Education (OCTAE). The vendor is

committed to working with RIDE to maximize integration with other state systems and track participation across state agencies.

For TANF (RI Works), the Department of Human Services uses two state systems. One, RIBridges, is an integrated eligibility data system for 17 DHS programs, including RI Works, the Supplemental Nutrition Assistance Program, Medicaid, and the Child Care Assistance Program. Vendors do not have access to RIBridges. Rather, to communicate participant information, such as attendance in required activities, to the Department, RI Works vendors enter data into a separate shared data system called "EARR" (Employment Activity Referral and Response) system. Vendors also receive information about referred participants through EARR. Both DHS ECAs and vendor staff enter data into their own systems as well as EARR.

DHS has worked with the vendors to create dashboards of important participant information. To ensure the dashboards present accurate data from vendors, DHS requires the vendors to submit monthly data in a warehouse completed with over 60 data points about each of their RI Works parents. DHS then uses those data elements to monitor RI Works and participant outcomes as part of the Active Contract Management approach. Using the vendor-reported data, DHS generates reports and dashboards and uses those to review vendor performance and track program trends over time. To ensure data quality, DHS cross-checks the information it receives in monthly reports with the EARR data that vendors enter.

Lastly, the State Workforce Development Board intends to explore the potential development and installation of an application programming interface (API) that would allow for back-end communication and interoperability of the various data and MIS systems being utilized among program partners. Such a solution would allow client information to be quickly and securely shared among partner programs, improving the customer service experience by eliminating duplicate processes and questions while simplifying administration, intake, and referral.

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.

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.

Key Definitions:

Covered Person – the regulations adopt and apply this statutory term, which includes veterans and eligible spouses.

Veteran – the regulations specify that the definition for veteran specified at 38 U.S.C. 101(2) applies across all qualified job training programs for the purpose of priority of service. The definition includes two key criteria:

- Service in the active military, naval, or air service
- Discharge under conditions other than dishonorable

Eligible Spouse – means a spouse of any of the following:

- A spouse of any veteran who died of a service- connected disability;
- A spouse of any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days;

    - Missing in action;
    - Captured in the line of duty by a hostile force; or
    - Forcibly detained or interned in the line of duty by a foreign government or power.
- A spouse of any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
- A spouse of any veteran who died while a disability was in existence.

Rhode Island's local Workforce Development Boards (LWDBs) will ensure their local plans provide clear strategies and policies for providing Covered Persons with priority for the highest quality of service at every phase of services offered. Policies shall be implemented to ensure eligible veterans and eligible spouses are aware of:

- Their entitlement to priority of service
- The full array of programs and services available to them
- Any applicable eligibility requirements for those programs and/or services

Priority of Service to Covered Persons means when customers self-attest they are a veteran or an eligible spouse, they are given precedence over eligible non-covered persons for the receipt of employment, training and placement services provided under new or existing qualified job training programs. If a customer self-attests, they must meet eligibility for POS under 38 USC Section 4215. Veterans or eligible spouses shall receive access to the service or resources before noncovered persons. If the service or resource is limited, the veteran or Covered Person receives access to the service or resource instead of or before the non-covered person. For example, this could mean:

- The Covered Person receives access to the service or resource earlier in time than the noncovered person; or
- If the service or resource is limited, the Covered Person receives access to the service or resource before the non-covered person.

At the point of entry all covered persons are given an opportunity to be screened by AJC staff member using the "Initial Veteran Assessment Tool.'" When an eligible veteran or eligible person has indicated to they have one or more Significant Barriers to Employment (SBE) as outlined in Veteran Program Letters (VPL) Nos. 03-14 and 03-19, then a referral is made to a Disabled Veteran Outreach Specialist (DVOP) for individualized career services and the AJC staff member will enter an "Initial assessment" in the Case Management Information System.

In an event that a DVOP is unavailable the covered person is afforded the opportunity to be seen by next available AJC staff member. In addition, the covered person's information is referred to the AJC managers who are responsible for ensuring he or she will be outreached by a DVOP for individualized career services at a later time. If a covered person 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 basis 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 covered persons the opportunity to self-identify as a veteran or eligible spouse through virtual self-service registration. If a customer self-attests, they must meet eligibility for POS under 38 USC Section 4215. Questions are embedded at initial enrollment that will also act as the screening tool to identify a Significant Barriers to Employment (SBE) outlined in in Veteran Program Letters (VPL) Nos. 03-14 and 03-19. When a covered person has indicated having one or more Significant Barriers to Employment (SBE) it will generate a notification that will be sent to the closest geographically located AJC to be outreached by a DVOP.

The Veteran Service Coordinator will assist AJC managers in the verification process of covered persons by providing expertise in veteran documents and priority of service. In such cases where a covered 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 is verified. During this time, DVOP specialists and/or AJC staff members will continue to render individualized 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 assist covered persons with resources to recover these documents, while continuing to provide services. Rhode Island also promotes outreach and recruitment of veterans for career services and programming. To that end, Veteran Service Coordinator, DVOPs, and AJC staff will 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 as veterans' priority of service.

Training on priority of service regulations, veteran referral processes and guidance on the "Initial Veteran Assessment Tool" will be provided on no less than a quarterly basis by the Local Veteran Employment Representative (LVER) as well as by One Stop Center managers, and other appropriate partners.

Initial 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. Ongoing monitoring to ensure that Priority of Service for Covered Persons is successfully implemented statewide is responsibility of the Department of Labor and Training as well as LWDB leadership.

The JVSG staff, the State Office of Veterans Affairs, and the monitoring staff within the Department of Labor and Training, are available to provide technical assistance when requested or needed. Monitoring activities generally include on-site visits, interviews with staff, and regular reviews of local plans and (if available) LWDB policies related specifically

to “Priority of Service for Covered Persons.” Furthermore, the JVSG staff will identify issues and resolutions to Priority of Service as they arise.

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)

The Unified or Combined State Plan must include assurances that:

1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;	Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;	Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;	Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes

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

VI. Program-Specific Requirements for Core Programs

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

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

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

a. 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.

Per WIOA Section 106(a); the Governor must further develop a policy and process for identifying regions in consultation with the State Workforce Board and chief local elected officials. The policy must evaluate the local areas in the proposed region considering the following criteria:

- Share a single labor market
- Share a common economic development area
- Possess federal and nonfederal resources, including appropriate education and training institutions to administer activities under WIOA subtitle B.

The Governor may also consider the following factors:

- Population centers
- Commuting patterns
- Land ownership
- Industrial composition
- Location quotients
- Labor force conditions
- Geographic boundaries
- Additional factors as determined by the Secretary of Labor

In consultation with the State Workforce Board and chief local elected officials, the Governor has designated each local workforce development area (the Providence-Cranston

LWDA and the Greater Rhode Island LWDA) a planning region. Accordingly, a regional plan is not required, and Local Boards must submit only a Local Plan to the Governor for approval.

The Board may periodically revisit this policy and the designation of planning regions using the factors described above. Furthermore, the state may approach bordering states and local areas about the possibilities of regional planning in the future. The Governor shall have final authority over the identification of regions.

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:

- performed successfully;
- sustained fiscal integrity; and
- 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:

- 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.
- How the proposed local workforce development area is aligned with a regional economic development area within the state of Rhode Island.

- 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:

1. a statement that the chief elected official(s) is appealing the denial of designation;
2. the reason(s) why the local area should be designated;
3. 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. 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).
4. The final decision rests with the Governor.
5. 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

A. 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.

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

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 offer 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.

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

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.

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

As the administrator of Trade Adjustment Assistance Act services, the 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. In cases where Rapid Response is not presently working with the employer or employee upon notification that a petition has been filed, the WDS notifies the Rapid Response team in order that outreach efforts to that employer or impacted employee can commence**.**

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. Early intervention and Rapid Response services are provided in a manner consistent with state Rapid Response policy (WIN 18-06 https://gwb.ri.gov/wp-content/uploads/2017/06/RapidResponse.Policy.04192018.pdf?a1a695).

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 Workers Program Requirements

1. Work-Based Training Models

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

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:

1. 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.

2. 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 statue 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:

1. Training providers that are debarred by any state or the federal government during the debarment period;
2. 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

1. Training providers must be a legal entity, registered to do business in the State of Rhode Island.
2. 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.
3. 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.

4. 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.

5. 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.

6. 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.

7. 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.

8. 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

g. The Genetic Information Nondiscrimination Act of 2008.

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:

1. A recognized post-secondary credential, secondary school diploma or its equivalent,
2. Employment, or
3. 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:

1.

a.

i.

1. Training providers offering distance learning programs must be licensed to provide training in the State of Rhode Island.
2. Training providers must have a mechanism for student interaction with an instructor or instructors.
3. Training providers must ensure periodic assessment of each student.
4. Training providers' policy must describe the responsibilities of each party (training provider, participant) to the distance learning experience.

5. Training providers must have a mechanism in place for tracking student's participation in the ETPL Training program.
6. 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:

1. the degree in which the training program relates to in-demand industry sectors and occupations;
2. length and cost;
3. 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;
4. credentials- how they are valued by an employer, and how they are associated with specific occupations;
5. training program completion rates
6. 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:

1. Performance Accountability and Outcomes
2. Ensure access to training services throughout the State (including use of technology)
3. Dissemination of Performance Outcomes and training information
4. Training must lead to "In-Demand" industry occupations and sectors
5. State licensing requirements and licensing status of providers

6. Encouragement of industry recognized certifications
7. Provider's ability to offer a credential
8. Quality of training
9. Ability to serve individuals with barriers
10. 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]

1. An initial review is conducted by the State's ETPL Coordinator to determine if the Training Provider is an eligible entity.
2. 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.
3. The Training Provider will then be instructed to submit each desired program for program approved through the virtual one-stop system.
4. 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

5. 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.
4. Information reported to State agencies on Federal and State training programs other than programs within WIOA title I-B.

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. A 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:

1. The percentage of all program participants who are in unsubsidized employment during the second quarter after exit from the program;
2. The percentage of all program participants who are in unsubsidized employment during the fourth quarter after exit from the program;
3. The median earnings of all program participants who are in unsubsidized employment during the second quarter after exit from the program;
4. 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 its 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:

1. The training program is new and data on past performance is not available;
2. Only partial performance data is available;
3. Collection of data will cause excessive costs and/or hardship for the training provider during the initial eligibility; and/or
4. 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:

1. Tuition
2. Fees
3. Books
4. Licensing cost
5. Certificate fees
6. Graduation fees
7. Uniforms
8. Tools
9. Registration fees
10. 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 statue, 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. Substantially violating the requirement to timely and accurately submit all required information;
4. Failure to meet required performance outcomes;
5. Failure to abide by the equal opportunity and nondiscrimination requirements under WIOA Section 188;
6. Failure to comply with monitoring and audits;
7. Failure to maintain required licenses and accreditation requirements;
8. Failure to comply with all applicable provisions in the ETPL contract; or
9. Other just cause.

For the purposes of this section, “Substantial Violation” may be construed to be one or more egregious violations in a short period of time or numerous minor violations over a longer period of time.

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:

1. Details of discussion; date, time, method of communication (phone, meeting, etc.), persons involved in discussion, and any other relevant details;
2. Description of circumstances;
3. Description of steps that will be taken to rectify the situation, including procedural changes that prevent reoccurrence;
4. 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 Adulty 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. With respect to youth workforce investment activities authorized in section 129 of WIOA—

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

1. Identify the State-developed criteria to be used by local boards in awarding grants or contracts for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA in awarding such grants or contracts.[11]

[11] Sec. 102(b)(2)(D)(i)(V)

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. Lastlythe 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. [12]

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

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.

	Additional Assistance - Educational Barriers
ISY	• Has missed 18 or more days of school in the most recent academic year (secondary only)
	• In school (secondary or postsecondary) with a GPA of less than 2.0.
OSY	• Has left educational program because of transportation or financial situation (secondary only)
In-School and Out of School Youth	• One or more grade levels below age appropriate level
	Additional Assistance - Employment Barriers
	• 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.

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

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."

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

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)). States with a single workforce area must include—

1. Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)

2. The entity responsible for the disbursal of grant funds, as determined by the governor, if different from that for the State. (WIOA section 108(b)(15).)

3. A description of the type and availability of WIOA title I Youth activities and successful models, including for youth with disabilities. (WIOA section 108(b)(9).)

Element not applicable to Rhode Island.

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

Element not applicable to Rhode Island.

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

Element not applicable to Rhode Island.

6. How training services outlined in section 134 will be provided through individual training accounts and/or through contracts, and how such training approaches will be coordinated.

Describe how the State will meet informed customer choice requirements regardless of training approach.

Element not applicable to Rhode Island.

7. How the State Board, in fulfilling Local Board functions, will coordinate title I activities with those activities under title II. Describe how the State Board will carry out the review of local applications submitted under title II consistent with WIOA secs. 107(d)(11)(A) and (B)(i) and WIOA sec. 232.

Element not applicable to Rhode Island.

8. Copies of executed cooperative agreements which define how all local service providers will carry out the requirements for integration of and access to the entire set of services available in the one-stop delivery system, including cooperative agreements with entities administering Rehabilitation Act programs and services.

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;

2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;

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

4. Describes how the waiver will align with the Department's policy priorities, such as:

A. Supporting employer engagement;

B. Connecting education and training strategies;

C. Supporting work-based learning;

D. Improving job and career results, and

E. Other guidance issued by the department.

5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and

6. Describes the processes used to:

A. Monitor the progress in implementing the waiver;

B. Provide notice to any local board affected by the waiver;

C. Provide any local board affected by the waiver an opportunity to comment on the request;

D. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.

E. Collect and report information about waiver outcomes in the State's WIOA Annual Report.

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

(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.

Title I-B Assurances

The State Plan must include assurances that:

The State Plan must include	Include
1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	Yes
2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	Yes
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	Yes
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine	Yes

The State Plan must include	Include
the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	Yes

Adult Program Performance Indicators

Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

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

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

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	79.0%	81.0%	80.0%	82.0%
Employment (Fourth Quarter After Exit)	79.0%	79.0%	80.0%	80.0%
Median Earnings (Second Quarter After Exit)	$6100	$6600	$6250	$6800
Credential Attainment Rate	50.0%	53.0%	55.0%	58.0%
Measurable Skill Gains	33.0%	38.0%	34.0%	40.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

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

Dislocated Program Performance Indicators

Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

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

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

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	81.0%	81.0%	82.0%	82.0%
Employment (Fourth Quarter After Exit)	81.7%	81.7%	82.2%	82.2%
Median Earnings (Second Quarter After Exit)	$7200	$7200	$7250	$7700
Credential Attainment Rate	75.0%	75.0%	76.0%	76.0%
Measurable Skill Gains	28.0%	40.0%	31.0%	42.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

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

Youth Program Performance Indicators

Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states

are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	**PY 2020 Expected Level**	**PY 2020 Negotiated Level**	**PY 2021 Expected Level**	**PY 2021 Negotiated Level**
Employment (Second Quarter After Exit)	68.0%	68.0%	70.0%	70.0%
Employment (Fourth Quarter After Exit)	68.0%	68.0%	69.5%	69.5%
Median Earnings (Second Quarter After Exit)	$2980	$2980	$3050	$3050
Credential Attainment Rate	50.0%	53.0%	51.0%	55.0%
Measurable Skill Gains	32.0%	40.0%	33.0%	42.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

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

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

All Program-Specific Requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

a. Employment Service Staff

1. Describe how the State will staff the provision of labor exchange services under the Wagner-Peyser Act, such as through State employees, including but not limited to state merit staff employees, staff of a subrecipient, or some combination thereof.

Rhode Island will continue to utilize State employees to provide labor exchange services under the Wagner-Peyser Act in the most effective and efficient way.

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

Employment Service Professional Staff Development

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.

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

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 additional 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; and

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.

Claimants can receive Wagner-Payer services through both self-service and staff-assisted interaction within the One-Stop and Virtual One-Stop system. Through staff-assisted interaction, Claimants are offered services that include job search assistance, career counseling, skills assessment, skills gap analysis, resume writing assistance, and interviewing skills workshops. Claimants determined, through provision of these services, to show interest and aptitude towards a specific field that would require training and subsequently provide them opportunities for sustainable reemployment are then assessed through various tools, including the Objective Assessment tool in our MIS (EmployRI). If determined to meet the appropriate minimum pre-requisite requirements set forth for a particular training program to be successful in the field of that training, Claimants are then referred to One-Stop WIOA staff for determination of eligibility for WIOA-funded training and education programs. Application assistance for these WIOA-funded programs is then provided to the Claimant by their assigned Counselor

e. Agricultural Outreach Plan (AOP). Each State agency must develop an AOP every four years as part of the Unified or Combined State Plan required under sections 102 or 103 of WIOA. The AOP must include an assessment of need. An assessment need describes the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

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

The unique needs of farmworkers in RI based on past and projected agricultural and farmworker activity are: career counseling, skills assessment, job search assistance, suitable job training program referrals, information about community resources that provide MSFWs with food and clothing, housing, and health care clinics. MSFWs are also in need of information regarding services for ensuring resolution of complaints related to wages, working conditions, housing, discrimination, and worker rights.

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.

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.

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

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.

As mentioned previously, the unique needs of farmworkers in RI based on past and projected agricultural and farmworker activity continue to be: career counseling, skills assessment, job search assistance, suitable job training program referrals, information about community resources that provide MSFWs with food and clothing, housing, and health care clinics. MSFWs are also in need of information regarding services for ensuring resolution of complaints related to wages, working conditions, housing, discrimination, and worker rights.

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:

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:

1. Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.
2. 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.
3. Increasing outreach worker training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues.
4. Providing State merit staff outreach workers professional development activities to ensure they are able to provide high quality services to both jobseekers and employers.
5. Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.

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

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.

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 and conduct outreach through Business Service Specialists The State Monitor Advocate (SMA) is available to assist in the conduct of outreach activities as well. All outreach staff effort to bring information about all services and benefits that MSFWs can receive. Business Service Specialists outreach staff and the RI SMA conduct full-time outreach activities to MSFWs throughout the state during the peak harvest season during

the month of July. RI SMA and Full Time MSFW Outreach is designed as one full time staff member due to the history of minimal MSFW workers in the state. Outreach activities are conducted to RI farms in order to locate and inform migrant and seasonal farm workers about all the services available through the netWORKri One-Stop Career Centers and through our local partners. The Agency will make additional staff available, as needed, to assist in outreach activities. Such staff will have the requisite program background, experience and language abilities

RI will further maintain a collaborative atmosphere between state agencies, nonprofits and the farming community. Continued coordination is critical to maintain a flourishing agricultural region. The state 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.

B. Providing technical assistance to outreach staff. Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the Employment Service and Employment-Related Law Complaint System ("Complaint System" described at 20 CFR 658 Subpart E), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

The State Monitor Advocate (SMA) is available to provide technical assistance to all Business Service Specialists MSFW Outreach Staff. When additional outreach staff is determined necessary, technical assistance will be provided to that staff as well. The SMA will ensure that the MSFW outreach staff 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, the DLT and the New England Farm Workers Council (NEFWC) have entered into a non-financial cooperative agreement. The DLT MSFW outreach staff will be trained to work together with NEFWC in providing MSFWs referral to trainings, career services, and supportive services. Technical assistance to MSFWs Outreach Workers will also include the Employment Service and the Employment-Related Law Complaint System described at 20CFR 658 Subpart E. The technical assistance would also provide the basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment. Training such as Labor Wage & Hour, field checks, house inspections, OSHA, Sexual Discrimination, Food Safety, House Inspections, and Pesticides are some of the technical assistance that would be included.

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

RI DLT will increase training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues to staff who conduct outreach to MSFWs. Outreach staff will be trained on how to refer MSFWs for Unemployment benefits, benefit rights, claim status, and how to return to work. Also, with the addition of Geographic Solutions (GEOSOL) unemployment insurance MSFWs claimants are automatically connected to the Wagner-Peyser services within the VOS system. Training will also include WIOA requirements and career services that MSFWs can benefit from. Training will include the WIOA Core programs and how all the core programs, WIOA Title I, II, III, IV, V and additional partners can provide many services to the MSFW population.

D. Providing State merit staff outreach workers professional development activities to ensure they are able to provide high quality services to both jobseekers and employers

The 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.

RI DLT will provide professional development activities to Business Service Specialists, as well as additional outreach staff if determined necessary, using online training modules, hosting webinars, and providing videos/training material from WorkforceGPS. Training and development activities will increase knowledge and skills in all areas of the Migrant Seasonal Farm Workers Program. Outreach staff would be trained on all WIOA core programs, understanding all available services and resources to effectively provide high quality service and referral to all MSFWs seeking work as well as to agriculture employers.

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

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.

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

RI DLT provides a full range of employment and training services to the agricultural community, both farmworkers and agricultural employers through the One-Stop Delivery System. Outreach Staff inform agricultural employers about the Business Workforce Navigation portal: https://workforceri.com/navigator. Staff would also will continue to offer information on services and programs to MSFWs and business services to promote growth and retention. Farmworkers are referred to employment and training programs by registering them on all WIOA core programs, offering all available services and resources to effectively provide high quality service. Agriculture employers continue to receive services such as how to post jobs directly into EmployRI or how to post a job using online forms. Outreach staff would assist agricultural employers in managing human resource needs. Agricultural employers are also educated on many tax credit and grant programs such as the Work Opportunity Tax Credit, The Job Growths act, CommerceRI and many more.

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.

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

RI DLT will continue to market the employment service complaint system to farmworkers and other farmworker advocacy groups through in-person visits. Posters will also be posted on all One-Stops to inform all workers of the complaint system. RI DLT will continue to make New England Farm Workers Council (NEFWC) and other Community Based Organizations aware of the complaint system during meetings, visits, and online. Marketing efforts with NEFWC as well as with public and private community service agencies and MSFW groups have proven successfully.

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.

C. Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers and how it intends to improve such publicity.

RI DLT will continue to market the Agricultural Recruitment System for US workers to agricultural employers through DLTs Workforce Services. One-Stops throughout the state offer employment services to all customers and employers. RI DLT will make agricultural employers aware of services available through meetings, outreach, pamphlets, and online information. RIDLT participates in annual farmworkers fairs to meet agricultural employers and market the ARS. The SMA intends to provide more workshops and seminars to assist and inform as many farm owners, farm labor contractors, and field supervisors on how to attain and retain a viable workforce.

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.

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 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.

Participation and Public Comment
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:

- RI Department of Environmental Management-Agricultural Division
- RI Farm Bureau http://rifb.org/
- Farm Fresh RI http://www.farmfreshri.org/
- UDAFarm Service Agency http://www.fsa.usda.gov/FSA/stateoffapp?mystate=ri

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.

RI DLT has been meeting its goals providing MSFWs quantitatively proportionate services as compared to non-MSFWs. The projected level has been met with outreach efforts reaching the 20 days during peak season. Outreach activities during the peak and year-round season have been successful. Services to MSFWs that cannot speak the English language has increased. Significant progress in services provided to farmworkers with limited English skills has been achieved with one Career Counselor assigned to each of the four netWORKri locations throughout the state to work with this population. This bilingual assistance has proven successful in finding work in agriculture for MSFWs. The Equity Ratio Indicators for services in the last four years indicates RI meets typically three of the indicators. These are the workers that were referred for career services, referred to supportive services, and referred to job development contacts.

	PY17	PY 18	PY19	PY20
Number of agricultural job orders received	8	8	8	8
Number of agricultural job orders filled	8	8	8	8
Number of H-2A interstate clearance job orders received	0	0	0	0
Number of H-2A interstate clearance job orders initiated	0	0	0	0
Number of non H-2A interstate clearance job orders received	0	0	0	0

Number of agricultural job orders expected to be received	5
Number of agricultural job orders projected to be filled	5
Estimated number of interstate clearance orders received	8
Estimated number of interstate clearance orders initiated	8

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.

For the quarter ending June 30, 2018 the DLT met it's 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, outreach staff met with Community Based Organizations to explain services available and to promote cooperative working relations between the DLT and farm worker groups.

The State Monitor Advocate has successfully provided workshops in collaboration with state and federal enforcement agencies designed to increase the number of agricultural employers utilizing the netWORKri centers. The numeric goals were met by conducting outreach activity with a NFJP representative and visiting as many community-based organizations that work with agriculture workers and farm owners. The goal was met at 20 days of outreach during the peak season throughout the state. The State Monitor Advocates (SMA) and other Outreach Staff will continue to conduct outreach visits to farm workers and farm owners all year round to promote growth and retention.

E. State Monitor Advocate

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

RI State Monitor Advocate has been afforded the opportunity to review and provide input into the Agricultural Outreach Plan. The SMS comments and recommendations have been incorporated into the Plan. The SMA will be kept informed of further plan developments.

Wagner-Peyser Assurances

The State Plan must include assurances that:

The State Plan must include	Include
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	Yes
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	Yes
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and	Yes
4. SWA officials: 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been discontinued; 4) Approve corrective action plans; 5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days; 6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and 7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.	Yes

Wagner Peyser Program Performance Indicators

Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

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

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

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	73.0%	73.0%	73.5%	73.5%
Employment (Fourth Quarter After Exit)	68.0%	68.0%	69.0%	69.0%
Median Earnings (Second Quarter After Exit)	$6000	$6200	$6080	$6400
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

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

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

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

a. Aligning of Content Standards

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

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 <u>concurrently</u>:

- 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. RIDE maintains a waiting list that reflects unmet demand for adult education services statewide. RIDE will work with relevant state partners, including the Governor's Workforce Board, to reduce the number of adults waiting to access adult education 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:

1. A description of how funds awarded under this title will be spent consistent with the requirements of this title;
2. 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;
3. 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;
4. 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;
5. A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;
6. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individ-uals; and
7. 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) **w**ere awarded to the RI Department of Corrections (DOC). RIDE will hold another RFP 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 transitions 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:

1. A description of how funds awarded under this title will be spent consistent with the requirements of this title;
2. 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;
3. 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;
4. 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;
5. A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;
6. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individ-uals; and
7. 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 (ELLs) 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. 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. Students also receive well-aligned occupational skills training, which may be delivered by a partner agency. Occupational skills training may be delivered concurrently or sequentially with the IELCE activities. Upon completion of training, students are placed in unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

The four providers that receive IELCE funding under the current grant cycle deliver programming for ELLs in four sectors: construction, education, health care, and hospitality. Programming is delivered through a variety of models including I-BEST, workplace learning programs (for incumbent learners), and pre-apprenticeships aligned with eligibility requirements for local apprenticeship programs. Technical skills development is supported by contextualized ESOL curriculum aligned with specific career pathways within the sectors, that is designed with input from industry partners – including employers and industry associations. ESOL instruction targets critical occupational competencies and is adapted among training programs to effectively prepare participants with the language proficiency necessary to perform in employment.The four current providers' programs include work-based learning opportunities and job-related experiences that align with given pathways. Learners earn industry-relevant credentials, including:

- Construction: OSHA-10
- Education: Teacher Assistant Certification, Youth Mental Health First Aid,
- Health Care: CNA License, Pharmacy Technician I License, NHA Certified Clinical Medical Assistant, Basic Life Support, AHA First Aid/CPR
- Hospitality: ServSafe Food Handler and Managers' Certificates, AHA First Aid/CPR, AHLEI Certified Guest Service Professional, 3-credit Postsecondary Business Course

Learners also benefit from navigational supports, including case management for basic needs insecurity and job coaching to cultivate work readiness skills and connect students with internship and employment opportunities.

All four currently-funded 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. All four of the current granteeproviders 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:

1. A description of how funds awarded under this title will be spent consistent with the requirements of this title;
2. 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;
3. 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;
4. 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;
5. A description of how the eligible provider will fulfill one-stop partner responsibilities as described in section 121(b)(1)(A), as appropriate;
6. A description of how the eligible provider will provide services in a manner that meets the needs of eligible individ-uals; and
7. Any information that addresses the 13 considerations described under section 231(e), as applicable.

e. State Leadership

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

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:

1. 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.

1. 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.

1. 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.

1. 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.

1. 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.

2. 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.

Adult Education and Family Literacy Act Program Certifications

States must provide written and signed certifications that:

The State Plan must include	Include
1. The plan is submitted by the State agency that is eligible to submit the plan;	Yes
2. The State agency has authority under State law to perform the functions of the State under the program;	Yes
3. The State legally may carry out each provision of the plan;	Yes
4. All provisions of the plan are consistent with State law;	Yes

The State Plan must include	Include
5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;	Yes
6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;	Yes
7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and	Yes
8. The plan is the basis for State operation and administration of the program;	Yes

Adult Education and Family Literacy Act Program Assurances

The State Plan must include assurances that:

The State Plan must include	Include
1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;	Yes
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not “eligible individuals” within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;	Yes
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes

Authorizing or Certifying Representative

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of
Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for
influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an
officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, ''Disclosure of Lobbying Activities,'' in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,00 0 and not more than $100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

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

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, ''Disclosure of Lobbying Activities,'' in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who

fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

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

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

APPLICANT'S ORGANIZATION	**Enter information in this column**
Applicant's Organization	Rhode Island Department of Elementary & Secondary Education
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	**Enter information in this column**
First Name	Angélica
Last Name	Infante-Green
Title	Commissioner of Elementary & Secondary Education
Email	

Section 427 of the General Education Provisions Act (GEPA)

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

Rhode Island Department of Education

Description of Activities under Section 427 of the General Education Provisions Act (GEPA)

In accordance with Section 427 of the US Department of Education's General Provision Act (GEPA), The Rhode island Department of Education (RIDE) is committed to equal access and participation for all employees, students, and the general public - regardless of their race, color, ethnicity, religion, national origin, gender, age, citizenship status, or disability - to the programs and services offered with these grant funds.

For state-level adult education activities as well as all other activities supported by federal assistance, the Rhode Island Department of Education will fully enforce all federal and state laws and regulations designed to ensure equitable access to all program beneficiaries and to overcome barriers to equitable participation. RIDE will take all steps necessary, whether by required notices, complaint procedures, appointment of liaisons, outreach activities, pursuit of conforming state legislation, or otherwise, to achieve these goals.

RIDE will take all necessary steps to ensure equitable access to, and equitable participation in, adult education programs. The provisions and strategies below will help to ensure that the principles of equal access and non-discrimination are applied and implemented:

- RIDE includes provisions to remove barriers to full participation in all Requests for Proposals and subsequent funding applications. Applicants must describe how the adult education program will address barriers to participation in the design of recruitment and service delivery for specific populations, including Limited English Proficient adults, adults with physical disabilities, and adults with learning differences;
- All RIDE grantees must sign assurances and attestations that ensure compliance with the Civil Rights Act, Americans with Disabilities Act, GEPA;
- Professional development and technical assistance, through State Leadership Activities, are provided to grantees on program processes to support equal access and non-discrimination such as intake/orientation processes, providing accommodations and adaptions, utilizing assistive technology, and implementing universal design and other strategies in the classroom;
- RIDE monitors local grantees' GEPA compliance through grantees' annual application for renewal of funding, as well as through interviews, facility visits, and records reviews conducted as part of onsite grantee monitoring visits and desk audits;
- RIDE prioritizes collaborative planning and coordinated delivery of services at both the state and local levels with other state agencies that serve the same client. For example, coordination at the state and local levels with RI Department of Labor and Training and RI Department of Human Services helps remove barriers to participation for economically disadvantaged adults, single parent heads of households, and older adults;
- RIDE coordinates with other federal programs as applicable - for example, continued collaboration with the state Office of Rehabilitative Services to coordinate service delivery to learning disabled adults;
- RIDE promotes collaboration between adult education programs, Family Literacy programs, and the K-12 educational system to reduce barriers to access for economically disadvantaged parents;
- Special education services are provided to eligible students in accordance with all applicable federal law and regulations, state statutes, rules of the State Board of

Education and Commissioner of Education, and the State Plan under Part B of the Individuals with Disabilities Education Act (IDEA); and

- All workshops, meetings, and conferences sponsored by RIDE are located in accessible facilities.

Adult Education and Literacy Program Performance Indicators

Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

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

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

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for

each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	**PY 2020 Expected Level**	**PY 2020 Negotiated Level**	**PY 2021 Expected Level**	**PY 2021 Negotiated Level**
Employment (Second Quarter After Exit)	24.0%	24.0%	26.0%	26.0%
Employment (Fourth Quarter After Exit)	34.0%	34.0%	35.0%	35.0%
Median Earnings (Second Quarter After Exit)	$4356.50	$4370.00	$4500.00	$4500.00
Credential Attainment Rate	23.0%	23.0%	24.0%	24.0%
Measurable Skill Gains	53.5%	53.5%	54.5%	54.5%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

Program-Specific Requirements for Vocational Rehabilitation (Combined or General)

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

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.

c. Cooperative Agreements with Agencies not Carrying out Activities Under the Statewide Workforce Development System

1. Federal, State and local agencies and programs

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.

4. Noneducational agencies serving out-of-school youth

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.

5. State use contracting programs

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.

d. Coordination with Education Officials

1. Cooperative Agreement with the Rhode Island Department of Education (RIDE)

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.

e. Cooperative Agreements with Non-profits

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.

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

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.

g. Coordination with Employers

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.

h. Interagency Collaboration

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.

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

3.A.1 Adequately Prepared and Trained Staff

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.

3.A.2 Annual Personnel Needs Assessments

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.

B. 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

4.A. System of Staff Development

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.

4.B. Acquisition and Dissemination of Significant Knowledge

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.

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

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.

j. Statewide Assessment

1.A) Provide an Assessment of the VR Rehabilitation Needs of Individuals with Disabilities Residing within the State

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.

k. Annual Estimates

3. The number of individuals who are eligible for VR services but are not receiving services due to an order of selection.

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.

l. State goals and priorities

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.

m. Order of Selection

1.A. 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.

n. Goals and Plans for the Distribution of Title VI Funds

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.

o. State Strategies

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.

p. Evaluation and Reports of Progress: VR and Supported Employment Goals

1A. Actual employment outcomes in competitive settings

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

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.

c. Cooperative Agreements with Agencies not Carrying out Activities Under the Statewide Workforce Development System

1. Federal, State and local agencies and programs

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.

4. Noneducational agencies serving out-of-school youth

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 two GWBs, 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

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

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.

e.) Cooperative Agreements with Non-profits

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

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

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.

h.) Interagency Collaboration

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.

1. **Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development**

3.A.1) Adequately Prepared and Trained Staff

ORS would like to thank the SRC for the commentary and suggestion. We will continue the current commitments.

3.A.2) Annual Personnel Needs Assessments

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.

4. Staff Development

4.A.) System of Staff Development

ORS thanks the SRC for this request and will keep the SRC apprised of offered trainings outside of ORS and scheduled ORS trainings.

4.B.) Acquisition and Dissemination of Significant Knowledge

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.

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

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.

j.) Statewide Assessment

1.A) Provide an Assessment of the VR Rehabilitation Needs of Individuals with Disabilities Residing within the State

ORS would like to thank the SRC for the hard work of everyone who worked to develop, modify, and review the survey.

k. Annual Estimates

ORS will provide regular updates on the waitlist and will provide information about any changes needed on plans to reduce or modify those numbers.

l.) State goals and priorities

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 on-going 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.

m. Order of Selection

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.

n. Goals and Plans for the Distribution of Title VI Funds

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

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.

o. State Strategies

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

1A. Actual employment outcomes in competitive settings

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.

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.

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 Department of Agriculture;

ORS does not have such cooperative agreements at this time.

4. Non-educational 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 RealJobsRI 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.

5. State use contracting programs.

The Vocational Rehabilitation program relies 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). ORS does not participate in State use contracting programs.

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)

- INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

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.

- VOCATIONAL REHABILITATION SERVICES/INDIVIDUALIZED PLAN FOR EMPLOYMENT:

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 transition services fall under the requirements outlined in the 2014 Workforce Innovation and 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. 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 students with disabilities 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 students with disabilities includes the five required services, as well as additional services under an IPE which 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 students with disabilities starting at age fourteen 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.

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.

ORS may provide transition or pre-employment transition services to eligible or potentially eligible students with disabilities. ORS will provide all five of the required Pre-ETS services and other services which may include, as appropriate, counseling and guidance, job exploration and assessments, Community Based Work Experience, Tri Employment Program, Transition Academy participation, Summer Work, ORS/LEA Community Employment Projects and travel training; however only the five required pre-employment transition services may be provided to potentially eligible students with disabilities. All other services may be provided to eligible students with disabilities under an IPE. 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;

ROLES AND RESPONSIBILITIES OF ORS AND RIDE:

A. FINANCIAL:

RIDE and LEAs will be responsible for transition services mandated by Federal and State laws and regulations. DHS/ORS will be responsible for Transition and Pre-Employment Transition services (PRE-ETS) consistent with the Rehabilitation Act, as Amended by WIOA 2014. RIDE will be responsible for ensuring that a free and appropriate education (FAPE) is made available to eligible students, including special education services included in the individualized education program (IEP), as authorized by the IDEA.

Pursuant to 34 C.F.R. §300. 1 54(b)361.22(c), nothing in this part will be construed to reduce the obligation under the Individuals with Disabilities Education Act (20 U .S.C. 1400 et seq.) of a local educational agency or any other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education (FAPE) to children with disabilities within the State involved.

Section 113(a)(b) of the Rehabilitation Act, as well as final §361.48(a)(2), requires ORS, in collaboration with the RIDE, to ensure that the required five PRE-ETS services are made available statewide to all students with disabilities in need of such services. RIDE will support ORS's collaboration with Local Education Authorities (LEA) in providing or arranging for the five required PRE-ETS described in this agreement to students with documented disabilities (students 14 years of age through their exit from high school) as defined under §361.5(c)(51), based on individual need, once a student requests or is recommended for one or more of the PRE-ETS services. Any PRE-ETS service that ORS provides will be available to students identified by the school of record or to a student known as a person with a disability by the YR counselor.

B. JOINT RESPONSIBILIES:

Both RIDE and ORS/DHS are the lead agencies in executing the Cooperative Agreement (CA) as follows:

• All personnel assigned to responsibilities described in this agreement will comply with the certification requirements of the respective lead agencies.

• RIDE and DHS/ORS will utilize the RI Transition Council and the State Rehabilitation Counsel as a venue for developing transition-related policies in the respective agencies.

• RIDE and DHS/ORS will follow their own agency's policies for the review and development of policies including the review of the Special Education Advisory Committee.

• RIDE and DHS/ORS will notify each other when new policies are in development or of policies that are being revised, to encourage collaboration in policy development related to transition. • As new federal or state requirements or initiatives are identified, YR and RIDE will provide joint training to school personnel and YR staff whenever possible.

• ORS and RIDE will address issues and concerns related to coordination and implementation of PRE-ETS and transition services in schools.

• If roles and responsibilities for the provision of PRE-ETS and transition services are unclear, ORS will contact the appropriate RIDE IDEA staff to clarify the roles and responsibilities of each entity.

• RIDE will support ORS staff in efforts to assist LEAs on issues and concerns related to coordination and implementation of pre-employment transition services and transition services.

• Section 511 of the Rehabilitation Act requires that anyone age 24 or younger may not start at subminimum wage unless it is documented that the person received pre-employment transition services or transition services under the Individuals with Disabilities Education Act (IDEA). and/or applied for ORS services and was unable to be successfully employed in an integrated competitive employment setting. For the purposes of a 2013 Consent Decree between the DOJ and state of RI, RIDE supports ORS in promoting Supported Employment Services where the individual is compensated at or above minimum wage in an integrated employment setting.

- Inform staff, students, legal guardians and parents of the mandates found in the 2013 Consent Decree between the DOJ and the state of Rhode Island which have requirements about integrated work experiences and competitive employment as expectations of Rhode Island as an Employment First state.

C. DHS/ORS RESPONSIBILITIES:

The DHS/ORS Associate Director or his/her designee will assign a Vocational Rehabilitation Counselor to each comprehensive high school in the state. The list of assigned Vocational Rehabilitation Counselor will be included in RIDE and DHS/ORS promotional materials.

• Assigned Vocational Rehabilitation Counselors will maintain a schedule of availability in each assigned school and convey this schedule to appropriate local education agency personnel.

• DHS/ORS is responsible for the implementation and compliance of Title IV of the Rehabilitation Act as amended by WIOA and all related Rhode Island laws and regulations.

• DHS/ORS will request LEAs, through the high school department chair or designee, to make every effort to schedule Individual Education Program (IBP) meetings during the scheduled hours of the Vocational Rehabilitation Counselor no less than one month prior to the IBP meeting. If the assigned counselor is unable to attend the meeting, the school personnel, student and parent will have materials about Vocational Rehabilitation Services

available for the IBP. Assigned Rehabilitation Counselors will make every attempt to attend IBP meetings for DHS/ORS eligible students expecting to graduate in two years or less.

• Rehabilitation Counselors will make efforts to attend meetings and events at assigned schools to share information about Vocational Rehabilitation including PRE-ETS, adult services, transition services, materials and the Order of Selection with students, parents, special education staff and school personnel. Rehabilitation Counselors will provide brochures and materials about the VR process and services to the school districts for distribution to students, parents, legal guardians, teachers and others.

• Students with disabilities, including those who have not yet applied for or been determined eligible for VR services will be informed by ORS of their ability to participate and receive the PRE-ETS services they may need. These services will be described and included in the IBP as appropriate, along with the identified Transition services.

• Students found eligible for Vocational Rehabilitation, who have a 504 plan or an IBP, are subject to the Order of Selection prioritization and placement on a Waiting list for services. Once off the Wait List, the student will have an Individualized Plan for Employment (IPE) developed in coordination with the assigned Rehabilitation Counselor no later than the senior (or graduating) year.

• ORS will plan for statewide implementation of PRE-ETS and transition services in keeping with this Agreement, policies, procedures and guidelines.

• ORS will accept referral of students with disabilities during the transition planning process
• for the provision of PRE-ETS and Transition services.

• ORS will provide consultation with and training to school district staff on transition planning to prepare a student to move from school to work or post-secondary education in accordance with the student's unique needs as determined through the IEP/504 process and provision of pre-employment transition services.

• Assess, plan, develop and provide VR services for eligible individuals with disabilities who have been referred for VR services, consistent with their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice, so that such individuals may prepare for and engage in competitive, integrated employment.

• Develop an Individualized Plan for Employment (IPE), which is consistent with and which takes into consideration the student-client's Individualized Education Plan (IBP), within 90 days of VR eligibility determination, unless an extension is approved.

• Provide consultation to assist in the identification of eligible and potentially eligible students with disabilities and assessment of their individual needs.

• Provide or arrange for the provision of services required by the IPE goal, when the student has been determined eligible for VR and the services are specific to his/her employment outcome, and are not services customarily provided to the student by the LEA under the Individuals with Disabilities Education Act (IDEA).

• Provide information to parents and/or guardian(s), student/clients regarding VR eligibility, Order of Selection, vocational assessment for employment and postsecondary planning and Client Assistance Program (CAP).

• Obtain written consent for the release of confidential information, pursuant to ORS policy and procedures, federal and state laws and regulations regarding confidentiality.

• Share information regarding policies, procedures, guidelines, programs and services for the purpose of improving the access to, and availability of, PRE-ETS and Transition services.

• Promote employer participation in providing opportunities for work-based learning for students with disabilities.

• DHS/ORS will assist with identification of students with disabilities for PRE-ETS and Transition services and who may be eligible for services.

• DHS/ORS will ensure applications are widely available to students with disabilities and their families; describe the referral process, application procedures, as well as timelines for each; provide informational literature; and explain eligibility requirements and the eligibility determination timeline. When an application is submitted, ORS will make an eligibility determination within 60 days unless exceptional and unforeseen circumstances beyond ORS's control preclude making an eligibility determination within 60 days and ORS and the students with disabilities agree to a specific extension of time.

• DHS/ORS will maintain an active presence and receive referrals of students with disabilities for pre-employment transition services as well as potential ORS applicants at: parent support groups, parent forums hosted by high schools, transition and career fairs, programs providing independent living skills training, organizations serving youth who are blind, partially sighted, deaf, hard of hearing or deaf-blind.

• Referral for ORS services can occur at any time during the school year and will be processed immediately upon receipt. ORS will communicate by phone, mail, or email with the referred students with disabilities and parents, as needed and appropriate, to submit an application and/or schedule an intake appointment.

D. RIDE AND LOCAL EDUCATON AGENCY RESPONSIBILITES:

• High school department chair or designee will strive to schedule Individual Education Program (IEP) meetings during scheduled hours of the Rehabilitation Counselor no less than one month prior to the IEP meeting. If the assigned counselor is unable to attend the meeting, the school personnel, student and parent will have materials about ORS for the IEP meeting.

• The development, scheduling and coordination of the IEP meeting.

• Mechanisms to monitor the implementation of this section of the CA will be included in the RIDE School Support Monitoring process.

• RIDE and LEAs will support ORS in the dissemination and implementation of preemployment services information and services.

RIDE will assign the State Transition Coordinator. This CA does not reduce the obligation under IDEA of a local education authority or any other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education to students with disabilities within the state.

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.

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 students with disabilities and obligates ORS to set aside 50% of its Title VI funds (when appropriated) for youth with the most significant disabilities.

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 timeframe for transitioning an individual from supported employment services to extended services is based upon the individual needs of each consumer. ORS may fund up to 24 months of supported employment services to individuals with the most significant disabilities following placement on the job. Including the provision of up to 24 months of supported employment services, ORS may provide up to four years of extended services to youth up to age 25 in addition to the transition to extended services; however ORS may not provide extended services to other than youth, which must be provided by CRPs or other sources.

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.

g. Coordination with Employers

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

1. VR Services; and

The 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 form the Department of Labor and Training, JobFindha Network, VOCcentral and NET(National Employment Team).

<u>COMPREHENSIVE NEEDS ASSESSMENT:</u>

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.

PRE-EMPLOYMENT TRANSITION SERVICES (Pre-ETS):

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.

h. Interagency Cooperation

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

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

ORS has a working relationship with each of the entities referenced in this attachment.

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; and

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. Supported employment services are available after job placement. 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, the Rehabilitation Act provides for 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 an individual from supported employment services to extended services is based upon the individual needs of each consumer. ORS may fund up to 24 months of supported employment services to individuals with the most significant disabilities following placement on the job. Including the provision of up to 24 months of supported employment services, ORS may provide up to four years of extended services to youth up to age 25 after the transition to extended services; however ORS may not provide extended services to other than youth, which must be provided by CRPs or other sources.

4. THE STATE AGENCY RESPONSIBLE FOR OPERATION OF ONE STOP CENTERS:

ORS, as required by WIOA, is a financial and programmatic partner with Rhode Island America's Job Centers (AJCs) formerly the netWORKri One-Stop Centers. ORS Vocational Rehabilitation Counselors have designated days and times at each of the One-Stop Centers in order to provide access to ORS services including consultations, accepting referrals, applications, counseling, information and referral, and placement services. This is also an opportunity for ORS Vocational Rehabilitation Counselors to re-enforce client awareness of the Career Center as an additional resource for help with employment including Real Jobs RI. ORS personnel provide consultation to the AJC's One-Stop staff on disability issues, accessibility considerations, and assistive technology, and are available for any cross-training opportunities that would apply to VR. ORS will provide One Stop 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 One Stop Staff. ORS also works with other pertinent assistive technology professionals through fee for service and comparable benefits that may better educate or equip the AJC staff in order to assist individuals with disabilities.

ORS has two Memorandums of Understanding with the RI Workforce Investment Board that defines the relationship between ORS and the One-Stop 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 and a subcommittee for Employment for People

with Disabilities that ORS personnel attend, and also participate in annual Request for Proposal reviews.

RI has two Workforce Investment Boards (WIBs). ORS became an active participant in the Disability Committee required by WIOA.

Budgetary issues in 2017 resulted in ORS implementing a change in Order of Selection to a stricter eligibility standard as of December 19, 2017. This resulted in increased collaboration and interaction with AJC One-Stop Centers and DLT programming. This created ample opportunity for strengthening the relationship between DLT, ORS, and BHDDH for common purposes and addressing Consent Decree demands.

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

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

1. System on Personnel and Personnel Development

A. Qualified Personnel Needs

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

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

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

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; and

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; and

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) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

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

1. ADEQUATELY PREPARED AND TRAINED STAFF

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.

2. ANNUAL PERSONNEL NEEDS ASSESSMENTS

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.

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.

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; and

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.

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

Distribute articles and literature about WIOA and vocational rehabilitation practices at supervisory meetings, regional team meetings, and training sessions.

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.

STATE REHABILITATION COUNCIL

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.

j. Statewide Assessment

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

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

RESULTS OF COMPREHENSIVE STATEWIDE ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES AND NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS

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
- Asian

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.

CUSTOMER SATISFACTION SURVEY

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.

ENVIRONMENTAL SCAN

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.

VR COUNSELOR COMPREHENSIVE NEEDS ASSESSMENT

Behavioral Health/Emotional Impairments, Cognitive Impairments, Physical Disabilities, Intellectual/Developmental Disabilities and Substance Abuse disorders comprised the majority of ORS caseloads.

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.

B. Who are minorities;

Rehabilitation Needs of 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; and

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; and

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 work place 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;

NUMBERS TO BE SERVED IN EACH ORDER OF SELECTION PRIORITY CATEGORY

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.

The projected number of eligible individuals to receive services in 2021 are:

OOS Category I - 2,016

OOS Category II - 3

OOS Category III - 0

Maintain Employment - 0

Total - 2,019

B. The Supported Employment Program; and

In FFY 2021, 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: 2,446

OOS Category II - Title VI: 3

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. ORS does not anticipate opening the waitlist for Category II or III during FFY 2020 through FFY 2022.

For FFY 2020 through FFY 2022, ORS will serve individuals with the most significant disabilities Priority Category I. ORS does not anticipate servicing individuals in Category II or III.

3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

As of 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. ORS will monitor funding and staff resources quarterly for availability of resources to move eligible clients off the Waitlist based on date of application.

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.

OOS Category I - Title I: $1,249.48 X 2,016 = $2,518,951.68

OOS Category I - Title VI: $1,249.48 x 430 = $537,276.40

OOS Category II - Title I: $1,249.48 x 3 = $3,748.44

l. State Goals and Priorities

The designated State unit must:

1. Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions

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

ALL OF THE FOLLOWING GOALS ARE FOR PY2020 and PY2021

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 need

- 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

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

- 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.

OBJECTIVE 3: Develop, implement, and replicate the successful business partnerships already operating

- 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

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.

- 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 identified.

OBJECTIVE 2: Change the culture of Supported Employment (SE) vendors to expect that competitive integrated employment is the goal from services.

- 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: Ensure vendor competence for provision of vocational services and training program that result in competitive integrated employment outcomes.

- 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.

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

- 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

OBJECTIVE 2: Meet RSA requirements for eligibility and plan development

- 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

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

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)

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; and

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 have been issued and received by ORS prior to the submission of this Program Years' State Plan.

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

Order of Selection Description: 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 [list] ... 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 one or more functional limitations 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 all other eligible individuals with disabilities who 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 2021through 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.

B. The justification for the order

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. We anticipate the same concerns through FFY 2021. As resources allow, ORS will continue this practice on the first of every month.

Through FFY 2021 due to upcoming retirements, vacancies, budget constraints, promotions, sick leaves and workforce reductions, ORS continues an Order of Selection. Individuals in all Categories will be placed on a Wait List for services. When resources have become available, Category I eligible clients will be moved off the Wait List based on date of application.

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.

C. The service and outcome goals

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):

FFY 2021 - OOS Category I: 2016

FFY 2021 - OOS Category II: 3

Individualized Plan for Employment (IPE):

FFY 2021 Title VI to be served under an IPE: 430

FFY 2021 IPE: 269

FFY 2022 IPE: 270

Successful Closures:

FFY 2021 Successful Closures: 541

FFY 2022 Successful Closures: 542

FFY 2021 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. Time within which these goals may be achieved for individuals in each priority category within the order; and

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.

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

STATE'S GOALS AND PLANS FOR TITLE VI FUNDS

The Rhode Island Office of Rehabilitation Services' (ORS) goals and priorities, policies, and planning activities for PY2020 - PY-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.

ALL OF THE FOLLOWING GOALS ARE FOR PY 2020 - PY 2022 TITLE VI

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.

ORS will utilize Title VI funds in the provision of SE services after an individual or youth with disability is placed in employment by using these strategies:

- Partner with two to three sector businesses to address personnel recruitment and training needs .
- Identify high turnover and/or specialized skill positions to ensure increased SE outcomes.
- Establish training program specific to sector positions to ensure increased SE outcomes.
- Pilot, modify, and replicate these programs to ensure increased SE outcomes.

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 to ensure increased SE outcomes using these strategies:

- Establish a system to disseminate information to VR Counselors
- Utilize internal group, Business Engagement Specialist Team, 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
- 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)

OBJECTIVE 3: Develop, implement, and replicate the successful business partnerships already operating to ensure increased SE outcomes using these strategies:

- 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

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 individuals and youths with disabilities into competitive integrated employment.

- Adults and Youth with Disabilities: ensure a wide array of service providers and training programs to enable individuals and youths with disabilities to obtain meaningful, quality employment as rapidly as possible, considering the occupational goal of the individual and the labor market.
- Develop the capacity and process for providing Job Coach supports for the provision of SE Services including the extended services to youth with disabilities
- Design and modify programs and services as changing needs of individuals and youths with disabilities are identified.

OBJECTIVE 2: Change the culture of Supported Employment (SE) vendors to expect that competitive integrated employment is the goal from services.

- 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 the provision of SE services.
- 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 SE Services and extended supports and work with providers to explore impediments to service delivery and strategize solutions to overcome obstacles in the provision of services
- Examine and modify, as needed, the VR fee structure to ensure it rewards integrated employment outcomes and extended support delivery for individuals and youths with disabilities.
- Provide training and support to providers to enhance business engagement activities.

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.

OBJECTIVE 4: Ensure vendor competence for provision of vocational services and training program that result in integrated competitive employment outcomes.

- 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.

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.

- 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 2: Meet RSA requirements for eligibility and plan development.

- 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.

OBJECTIVE 3: Monitoring Wait List

- 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.

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)

2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

A. The provision of extended services for a period not to exceed 4 years; and

Supported employment services for youth occur once the youth has been placed in employment according to the goal on his or her IPE. That may or may not occur while a youth is in school, but most often occurs after the youth exits school. WIOA provides 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 that ensures support once placed in employment.

<u>Students with disabilities in need of SE Services after job placement will likely need</u>:

- Enhanced Transitioning program and service options within each high school to coordinate and deliver services and work experiences to youth and students with disabilities in order to reach a competitive integrated employment outcome.
- Develop the capacity and process for providing Job Coach supports for the provision of SE Services including the extended services to youth with disabilities.
- 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.

<u>Youth Out-of-School in need of SE Services</u>:

- 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 that lead to competitive integrated employment and the provision of SE services including the extended services to youth with disabilities.

- .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.

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 (RIDE), BHDDH, Department of Human Services (DHS), and ORS to ensure collaborative funding methods support the provision of SE services as part of Transition and supports to youth with the most significant disabilities.

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

PY 2020 and PY 2021 goals and priorities established by ORS and the SRC as articulated in State Goals and Priorities and in State Goals and Plans for Title I and Title VI Funds will be realized through the following strategies:

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.

The Comprehensive Needs Assessment (CNA), required of the SRC and ORS at three-year increments, will incorporate the findings of the CSIP and identify additional assessment areas.

- 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 (netWORKri 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

PROVISION OF A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES 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 students with disabilities and those with significant disabilities, and 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 students with disabilities 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 student with disabilities potentially eligible for ORS. In addition, the DOJ/State Consent Decree requires each high school to develop Career Development Plans (CDP) with all student with disabilities 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 student with disabilities 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 has received 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 Sub-committee. 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.

ORS 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; and

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.

C. Overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

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 applications 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.

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

STATE PLAN FOR VR TITLE I FFY 2018/PY 2017 AND FFY2019/PY 2018:

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 COMPETITVE 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 PY 2018 and PY 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-allotment 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

STATE PLAN FOR SE Title VI FFY 2018 / PY 2017 and FFY 2019/PY 2018:

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.

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

- 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.

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:

- 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-Stops, 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.

OBJECTIVE 3: Develop, implement, and replicate the successful business partnerships already operating

- 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 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.

<u>In-School Youth with Disabilities</u>:

- 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.

<u>Adults with Disabilities</u>:

- 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.

OBJECTIVE 2: Change the culture of Supported Employment (SE) vendors to expect that integrated competitive employment is the goal from services.

- 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.
- 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

OBJECTIVE 3: Ensure vendor competence for provision of vocational services and training programs that result in integrated competitive employment outcomes.

- 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.

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 collec 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.

OBJECTIVE 2: Meet RSA requirements for eligibility and plan development:

- 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.

Accomplishments:

- 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 Pre-ETS fee for service program for potentially eligible students with disabilities aged 14 and above with 10 LEAs in 2019, with hopes of expanding the programming State-wide in 2020.

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

ORS saw during PY2017 and PY2018, the following 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:

<u>Obstacles</u>:

- 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.

<u>WIOA Performance Measures</u>

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	PY17	PY18
Employer Information and Support Services	3	4
Accessing Untapped Labor Pools	6	6
Training Services/Including OJT	3	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 Indictor 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 Indictor 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, which provides innovative training and placement services that are responsive to the business community and ORS clients.

ORS utilized I & E funds to support and augment the benefits counseling outreach provided by the Sherlock Center on Disabilities WIPA project.

ORS utilized I& E funds to support the activities of the SRC. In FFY 2020, ORS has utilized the SRC to assist with conducting a state-wide Comprehensive Needs Assessment.

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 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 an individual from supported employment services to extended services is based upon the individual needs of each consumer. ORS may fund up to 24 months of supported employment services to individuals with the most significant disabilities following placement on the job. After the provision of up to 24 months of supported employment services, ORS may provide up to four years of extended services to youth up to age 25; however ORS may not provide extended services to other than youth, which must be provided by CRPs or other sources. 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 the Rehabilitation Act amended by WIOA, can fund extended SE services to 24 months for

all individuals and extended SE services up to 48 months for youth with disabilities age 14 through age 24 with the most significant disabilities.

The IPE identifies 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 supports are provided solely by the CRP.

Our Transition Counselors also identify the CRP that accepts responsibility for providing core support services including extended supports for youth with disabilities aged 14 through age 24 with the most significant disabilities. 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, including referrals to BHDDH and or other natural supports that may be available.

Vocational Rehabilitation (Combined or General) Certifications

States must provide written and signed certifications that:

1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA[14], and its supplement under title VI of the Rehabilitation Act[15];

Enter the name of designated State agency or designated State unit, as appropriate

Office of Rehabilitation Services

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency)[16] agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan[17] , the Rehabilitation Act, and all applicable regulations[18] , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

Enter the name of designated State agency

Rhode Island Department of Human Services

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan[19] , the Rehabilitation Act, and all applicable regulations[20] , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the

provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

7. The (enter the name of authorized representative below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;

Enter the name of authorized representative below

Ronald Racine

8. The (enter the title of authorized representative below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;

Enter the title of authorized representative below

Associate Director

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

Footnotes

[14] Public Law 113-128.
[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.
[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.
[17] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.
[18] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations.
[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[20] Applicable regulations, in part, include the citations in footnote 6.

Certification Signature

Signatory information	Enter Signatory information in this column
Name of Signatory	Ronald Racine
Title of Signatory	Associate Director
Date Signed	3/18/2020

Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:**

The State Plan must include	Include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:Administration of the VR services portion of the Unified or Combined State Plan:	

The State Plan must include	Include
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	
3.b.(A) “is an independent State commission” (Yes/No)	No
3.b.(B) “has established a State Rehabilitation Council” (Yes/No)	Yes
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	No
3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as	

The State Plan must include	Include
appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	
3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	No
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act	
4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other	

The State Plan must include	Include
employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14)of the Rehabilitation Act	
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	
6. Financial Administration of the Supported Employment Program:	
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to	

The State Plan must include	Include
individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act	
7. Provision of Supported Employment Services:	Yes
7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act	
7.b. The designated State agency assures that:	
7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act	
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	

Vocational Rehabilitation Program Performance Indicators

Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a

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

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

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	11.4%	18.5%	12.7%	19.5%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

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

VII. Program-Specific Requirements for Combined State Plan Partner Programs

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyser Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program— and also submit relevant information for any of the eleven partner programs it elects to include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. 24 If included, Combined State Plan partner programs are subject to the "common planning elements" in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

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

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

NOTE: Unless otherwise noted, statutory references in this section are to Pub. L. 115–224,— *The Strengthening Career and Technical Education for the 21st Century Act* ("Perkins V" or "the Act"). (20 U.S.C. 2301 et seq.) The term "the State" used throughout this section refers to the State Perkins Eligible Agency and "the State Plan" refers to the "Perkins State Plan".

(OMB Control Number: 1830-0029)

a. Plan Development and Consultation

1. Describe how the State plan was developed in consultation with the stakeholders and in accordance with the procedures in section 122(c)(2) of Perkins V. See Text Box 1 for the statutory requirements for State plan consultation under section 122(c)(1) of Perkins V.

2. Consistent with section 122(e)(1) of Perkins V, each eligible agency must develop the portion of the State plan relating to the amount and uses of any funds proposed to be reserved for adult career and technical education, postsecondary career and technical education, and secondary career and technical education after consultation with the State agencies identified in section 122(e)(1)(A)-(C) of the Act. If a State agency, other than the eligible agency, finds a portion of the final State plan objectionable, the eligible agency must provide a copy of such objections and a

description of its response in the final plan submitted to the Secretary. (Section 122(e)(2) of Perkins V)

3. Describe opportunities for the public to comment in person and in writing on the State plan. (Section 122(d)(14) of Perkins V)

Text Box 1: Statutory Requirements for State Plan Consultation

- (c) PLAN DEVELOPMENT.—
- (1) IN GENERAL.—The eligible agency shall—
    - (A) Develop the State plan in consultation with—
        - (i) Representatives of secondary and postsecondary career and technical education programs, including eligible recipients and representatives of 2-year minority serving institutions and historically Black colleges and universities and tribally controlled colleges or universities in States where such institutions are in existence, adult career and technical education providers, and charter school representatives in States where such schools are in existence, which shall include teachers, faculty, school leaders, specialized instructional support personnel, career and academic guidance counselors, and paraprofessionals;
        - (ii) Interested community representatives, including parents, students, and community organizations;
        - (iii) Representatives of the State workforce development board established under section 101 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3111) (referred to in this section as the ‘‘State board’’);
        - (iv) Members and representatives of special populations;
        - (v) Representatives of business and industry (including representatives of small business), which shall include representatives of industry and sector partnerships in the State, as appropriate, and representatives of labor organizations in the State;
        - (vi) Representatives of agencies serving out-of-school youth, homeless children and youth, and at-risk youth, including the State Coordinator for Education of Homeless Children and Youths established or designated under section 722(d)(3) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11432(d)(3));
        - (vii) Representatives of Indian Tribes and Tribal organizations located in, or providing services in, the State; and
        - (viii) Individuals with disabilities; and

Text Box 1: Statutory Requirements for State Plan Consultation

- (B) Consult the Governor of the State, and the heads of other State agencies with authority for career and technical education programs that are not the eligible agency, with respect to the development of the State plan.

- (2) ACTIVITIES AND PROCEDURES.—The eligible agency shall develop effective activities and procedures, including access to information needed to use such procedures, to allow the individuals and entities described in paragraph (1) to participate in State and local decisions that relate to development of the State plan. (3) CONSULTATION WITH THE GOVERNOR.—The consultation described in paragraph (1)(B) shall include meetings of officials from the eligible agency and the Governor's office and shall occur—
  - (A) During the development of such plan; and
  - (B) Prior to submission of the plan to the Secretary.

(Section 122(c)(1) of Perkins V)

- AP – Advanced Placement
- CCRI – Community College of Rhode Island
- CLNA – Comprehensive Local Needs Assessment
- CTE – Career and Technical Education
- CTE Board – Career and Technical Education Board of Trustees
- CTSO – Career and Technical Student Organization
- DLT – Department of Labor and Training
- GO – Governor's Office
- GWB – Governor's Workforce Board
- ELL – English Language Learner
- ESSA – Every Student Succeeds Act
- FY – Fiscal Year
- ILP – Individual Learning Plan
- LEA – Local Education Authority
- OPC – Office of the Postsecondary Commissioner
- PD – Professional Development
- Perkins V – The Strengthening Career and Technical Education for the 21st Century Act

- PrepareRI – Prepare Rhode Island
- RIDE – Rhode Island Department of Elementary and Secondary Education
- WBL – Work-Based Learning
- WIB – Workforce Investment Board (WIB)
- WIOA – Workforce Innovation and Opportunity Act

II.A.1. Describe how the State plan was developed in consultation with the stakeholders and in accordance with the procedures in section 122(c)(2) of Perkins V and as provided in Text Box 1 on the following page.

In the summer of 2019, RIDE and the Career and Technical Education Board of Trustees (CTE Board) hosted seven stakeholder meetings totaling over 20 hours of in-person discussion with diverse groups of stakeholders, including specific invitations to each of the representatives of stakeholder groups named in section 122(c)(2) of Perkins V.

Key Questions

These meetings were organized around RI's established key questions for the State Plan development, as outlined in Rhode Island's FY20 transition plan:

- **State Alignment:** How can Rhode Island align its PK-20 workforce development initiatives? This includes, but is not limited to, aligning Prepare Rhode Island (PrepareRI) to career and technical education (CTE) and the needs of Rhode Island's employers.
- **Secondary to Postsecondary Transition:** How can Rhode Island increase alignment between secondary and postsecondary CTE programs, particularly the Perkins-grant-eligible Community College of Rhode Island?
- **Middle School:** How can and should Rhode Island increase career awareness, exploration, and programming in our earlier grades?
- **Funding:** How can Rhode Island strengthen our Perkins grant distribution models and leverage additional sources of funding to align with state goals for CTE and meet employer needs, as established by the CTE Board?
- **Equity:** How can Rhode Island increase the participation and outcomes of underrepresented student groups in CTE programs?
- **Careers in Priority Sectors:** How should Rhode Island's CTE system prepare students for the future of work and recognize high-skill, high-growth industries, emerging industries, and industries that are not identified as either?
- **Measuring Program Success:** How can Rhode Island continue to improve upon our system to hold our state and grantees accountable for ensuring students are graduating high school and postsecondary institutions prepared for career success and ready to meet the needs of industry?

Stakeholder Meetings

RIDE and the CTE Board hosted seven meetings across the state to engage as many stakeholders as possible and to provide multiple opportunities for feedback as the state plan continued to evolve. Meetings were held over the course of four months (June - October 2019) and throughout the planning process to ensure stakeholder feedback was integral to the plan's development. These meetings were advertised in the Commissioner's Field Memo and the PrepareRI Newsletter—which collectively reach over 23,100 people—and through direct communication with CTE programs.

The schedule and meeting topics were:

- June 27: Introduction to the Planning Process & Application Guidelines
- July 11: Secondary Programs
- July 18: Postsecondary Programs
- August 22: Academic & Workforce Readiness
- August 29: Funding Sources, Part 1
- September 12: Funding Sources, Part 2
- October 3: Presentation of Draft Plan (focusing on program requirements, measuring success, and funding sources)

Attendees represented a variety of stakeholder groups, including district and school leadership, CTE centers, community and industry partners, as well as business leaders and members of the CTE Board. Materials were sent via email to everyone who had signed up to receive Perkins V notifications, in case they were not able to attend.

Each meeting began with introductory remarks, including "partnership spotlights" of successful partnerships between industry and schools. These spotlights helped to highlight exemplary models that other schools could replicate and shine a light on successes from the field. They also provided an opportunity for employers to articulate their support for CTE and to share their future workforce needs.

Half of each meeting was a background presentation. Representatives from RIDE provided a summary of the key information needed to make the policy decision under discussion. This usually included a summary of existing policies, relevant outside federal or state policies, and data on the current landscape.

After the background section, RIDE presented the key policy question and a set of policy options. For example, the question for one meeting was "How should RIDE distribute Perkins funds to schools and districts?" and the policy options included different approaches to using consortia to receive Perkins funds.

After these presentations, the second half of the meeting was organized around small-group policy discussions. Attendees were broken into small groups with a facilitator, and discussed

the policy question and options presented. The facilitators took detailed notes, which were then compiled and tallied. This included qualitative feedback as well as rating each policy option from “Strongly Disagree” to “Strongly Agree.” The meeting structure was designed to maximize attendee participation with the use of both large group presentations and facilitated small group feedback sessions. The structure allowed time for attendees to provide feedback in small groups, providing for space for multiple voices to be heard.

After each meeting, RIDE compiled feedback from the small group discussion and surveys. This information was used to revise the policy recommendation in the State Plan. This recommendation was then presented at the subsequent stakeholder meeting and incorporated into the State Plan draft.

Incorporating Feedback

In addition to the stakeholder meetings described above, RIDE released six surveys throughout the summer focusing on key policy questions and proposals aligned to the questions above. These surveys were released statewide after each stakeholder meeting. The results of each survey were then shared at the subsequent stakeholder meeting.

Feedback from the plan was debriefed during weekly meetings of the PrepareRI Core Team, which consists of representatives of the Rhode Island agencies responsible for state education and workforce strategy, including: the Rhode Island Department of Elementary and Secondary Education (RIDE), Governor’s Workforce Board (GWB), Department of Labor and Training (DLT), Rhode Island Commerce, Governor’s Office, Office of the Postsecondary Commissioner (OPC), and Community College of Rhode Island (CCRI). These meetings also facilitated the coordination of alignment between the development of the Perkins Plan and the Workforce Innovation and Opportunity Act (WIOA) Plan.

The plan was presented and discussed at monthly CTE Board meetings, from September 2019 through February 2020. The CTE Board consists of representatives from private industry, labor, trade associations, government, K-12 schools, RIDE, postsecondary, adult education, economic development, and the Governor’s Workforce Board. RIDE solicited feedback from members of the Board to revise the plan.

Including the in-person meetings and surveys, Rhode Island gathered and analyzed over 5,000 feedback statements to inform the development of the draft plan. Data shows that respondents included representatives of all stakeholder groups named in the Perkins consultation list.

To make it easier for all stakeholders to understand the key changes in the Perkins plan, RIDE created a two-page summary of the major changes under Perkins V. This document was posted on the RIDE website, and sent out to the field in both the Commissioner’s Field Memo (which goes out to more than 21,000 people across the state, including all superintendents, principals, and teachers) and the PrepareRI newsletter (which goes out to 1,166 people across the state, including leaders from schools, businesses, and non-profits).

CTE Board Endorsement

The plan was also discussed at the monthly meetings of the CTE Board. The plan was formally endorsed by the CTE Board on February 7, 2020.

Public Comment

Following the development of the draft plan, RIDE released the plan for a formal public comment period of 30 days. During this time, RIDE held two formal public comment sessions with 14 participants and collected nine online survey responses. Most CTE stakeholders that talked with RIDE during this period said that they already knew the plan and had shared their feedback during the stakeholder meetings and CTE Board meetings, and they therefore felt no need to add formal public comment. Upon closing the public comment session, RIDE analyzed the comments and made some clarifications to the plan to address the feedback received.

The plan was provided to the Governor for her review and endorsement on March 14, 2020. The Governor's letter of endorsement will be uploaded once it is received.

II.A.2. Consistent with section 122(e)(1) of Perkins V, each eligible agency must develop the portion of the State plan relating to the amount and uses of any funds proposed to be reserved for adult career and technical education, postsecondary career and technical education, and secondary career and technical education after consultation with the State agencies identified in section 122(e)(1)(A)-(C) of the Act. If a State agency, other than the eligible agency, finds a portion of the final State plan objectionable, the eligible agency must provide a copy of such objections and a description of its response in the final plan submitted to the Secretary. (Section 122(e)(2) of Perkins V).

RIDE serves as the administrative entity for Perkins secondary, postsecondary, and adult education. RIDE serves as the primary policy-making entity for all these areas. Therefore, the State Plan does not require consultation with any other state agency in the areas of adult, postsecondary, and adult education. Nonetheless, RIDE included the Governor's Workforce Board (GWB), the Office of Postsecondary Commissioner, the Community College of Rhode Island (CCRI), and the Governor's Office in the ongoing refinements of the plan, through the weekly PrepareRI Core Team meetings. RIDE has also coordinated with the CTE Board, as it has statutory responsibilities related to CTE.

II.A.3. Describe opportunities for the public to comment in person and in writing on the State plan. (Section 122(d)(14) of Perkins V)

Following the development of the draft plan, RIDE released the plan for a formal public comment period of 30 days. During this time, RIDE and the CTE Board of Trustees hosted two formal public comment sessions to summarize the changes in the state plan, and received feedback. The public comment sessions had 14 attendees who shared zero responses. (Most CTE staff and attendees at the sessions noted that they were already familiar with the plan from the stakeholder engagement sessions and the CTE Board presentations on Perkins V.) RIDE also administered an online survey with nine responses.

Key takeaways from those sessions were shared at the following CTE Board meetings, PrepareRI Core Team meetings, and have been incorporated into the final state plan. Most of the online survey responses voiced concern about admissions policies for some CTE programs creating equity gaps in access to the programs. This Perkins V plan addresses those concerns by requiring CTE programs to report their admissions policies to RIDE, as well as data on the admissions patterns of students in the programs. If there is evidence of a disproportionate impact on student subpopulations, then RIDE will work with programs to close those equity gaps

b. Program Administration and Implementation

- 1. State's Vision for Education and Workforce Development
    - a. Provide a summary of State-supported workforce development activities (including education and training) in the State, including the degree to which the State's career and technical education programs and programs of study are aligned with and address the education and skill needs of the employers in the State identified by the State workforce development board. (Section 122(d)(1) of Perkins V)
    - b. Describe the State's strategic vision and set of goals for preparing an educated and skilled workforce (including special populations) and for meeting the skilled workforce needs of employers, including in existing and emerging in-demand industry sectors and occupations as identified by the State, and how the State's career and technical education programs will help to meet these goals. (Section 122(d)(2) of Perkins V)
    - c. Describe the State's strategy for any joint planning, alignment, coordination, and leveraging of funds between the State's career and technical education programs and programs of study with the State's workforce development system, to achieve the strategic vision and goals described in section 122(d)(2) of Perkins V, including the core programs defined in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102) and the elements related to system alignment under section 102(b)(2)(B) of such Act (29 U.S.C. 3112(b)(2)(B)); and for programs carried out under this title with other Federal programs, which may include programs funded under the Elementary and Secondary Education Act of 1965 and the Higher Education Act of 1965. (Section 122(d)(3) of Perkins V)
    - d. Describe how the eligible agency will use State leadership funds made available under section 112(a)(2) of Perkins V for each of the purposes under section 124(a) of the Act. See Text Box 2 for the required uses of State leadership funds under section 124(a) of Perkins V. (Section 122(d)(7) of Perkins V)

Text Box 2: Required Uses of State Leadership Funds

(a) GENERAL AUTHORITY.—

From amounts reserved under section 112(a)(2), each eligible agency shall—

- (1) Conduct State leadership activities to improve career and technical education, which shall include support for—

o (A) Preparation for non-traditional fields in current and emerging professions, programs for special populations, and other activities that expose students, including special populations, to high-skill, high-wage, and in-demand occupations;

o (B) Individuals in State institutions, such as State correctional institutions, including juvenile justice facilities, and educational institutions that serve individuals with disabilities;

o (C) Recruiting, preparing, or retaining career and technical education teachers, faculty, specialized instructional support personnel, or paraprofessionals, such as preservice, professional development, or leadership development programs; and

o (D) Technical assistance for eligible recipients; and

(2) Report on the effectiveness of such use of funds in achieving the goals described in section 122(d)(2) and the State determined levels of performance described in section 113(b)(3)(A), and reducing disparities or performance gaps as described in section 113(b)(3)(C)(ii)(II).

(Section 124 of Perkins V)

2. Implementing Career and Technical Education Programs and Programs of Study

- a. Describe the career and technical education programs or programs of study that will be supported, developed, or improved at the State level, including descriptions of the programs of study to be developed at the State level and made available for adoption by eligible recipients. (Section 122(d)(4)(A) of Perkins V)
- b. Describe the process and criteria to be used for approving locally developed programs of study or career pathways (see Text Box 3 for the statutory definition of career pathways under section 3(8) of Perkins V), including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 1321 [1] will—
  - i. Promote continuous improvement in academic achievement and technical skill attainment;
  - ii. Expand access to career and technical education for special populations; and
  - iii. Support the inclusion of employability skills in programs of study and career pathways. (Section 122(d)(4)(B) of Perkins V)
- c. Describe how the eligible agency will—

- i. Make information on approved programs of study and career pathways (including career exploration, work-based learning opportunities, early college high schools, and dual or concurrent enrollment program opportunities) and guidance and advisement resources, available to students (and parents, as appropriate), representatives of secondary and postsecondary education, and special populations, and to the extent practicable, provide that information and those resources in a language students, parents, and educators can understand;
- ii. Facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study and career pathways that include multiple entry and exit points;
- iii. Use State, regional, or local labor market data to determine alignment of eligible recipients' programs of study to the needs of the State, regional, or local economy, including in-demand industry sectors and occupations identified by the State board, and to align career and technical education with such needs, as appropriate;
- iv. Ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations;
- v. Coordinate with the State board to support the local development of career pathways and articulate processes by which career pathways will be developed by local workforce development boards, as appropriate;
- vi. Support effective and meaningful collaboration between secondary schools, postsecondary institutions, and employers to provide students with experience in, and understanding of, all aspects of an industry, which may include work-based learning such as internships, mentorships, simulated work environments, and other hands-on or inquiry-based learning activities; and
- vii. Improve outcomes and reduce performance gaps for CTE concentrators, including those who are members of special populations. (Section 122(d)(4)(C) of Perkins V)

Text Box 3: Statutory Definition of Career Pathways

The term ‘career pathways’ has the meaning given the term in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102)

Text Box 3: Statutory Definition of Career Pathways

(7) Career pathway.--The term "career pathway'' means a combination of rigorous and high-quality education, training, and other services that—

- (A) Aligns with the skill needs of industries in the economy of the State or regional economy involved;
- (B) 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 (commonly known as the "National Apprenticeship Act''; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.) (referred to individually in this Act as an "apprenticeship'', except in section 171);
- (C) Includes counseling to support an individual in achieving the individual's education and career goals;
- (D) 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;
- (E) 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;
- (F) Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least 1 recognized postsecondary credential; and
- (G) Helps an individual enter or advance within a specific occupation or occupational cluster. (Section 3(7) of the Workforce Innovation and Opportunity Act [Public Law 113- 128])

(Section 3(8) of Perkins V)

- d. Describe how the eligible agency, if it opts to do so, will include the opportunity for secondary school students to participate in dual or concurrent enrollment programs, early college high school, or competency-based education. (Section 122(d)(4)(D) of Perkins V)
- e. Describe how the eligible agency will involve parents, academic and career and technical education teachers, administrators, faculty, career guidance and academic counselors, local business (including small businesses), labor organizations, and representatives of Indian Tribes and Tribal organizations, as appropriate, in the planning, development, implementation, and evaluation of its career and technical education programs. (Section 122(d)(12) of Perkins V)
- f. Include a copy of the local application template that the eligible agency will require eligible recipients to submit pursuant to section 134(b) of Perkins V. See Text Box 4 for the statutory requirements for local applications under section 134(b) of Perkins V.
- g. Include a copy of the comprehensive local needs assessment template and/or guidelines that the eligible agency will require of eligible recipients to meet the

requirements of section 134(c) of Perkins V. See Text Box 5 for the requirements for the comprehensive local needs assessment under section 134(c) of Perkins V.

- h. Provide the eligible agency's definition for "size, scope, and quality" that will be used to make funds available to eligible recipients pursuant to section 135(b) of Perkins V.
- e. Describe how the eligible agency will involve parents, academic and career and technical education teachers, administrators, faculty, career guidance and academic counselors, local business (including small businesses), labor organizations, and representatives of Indian Tribes and Tribal organizations, as appropriate, in the planning, development, implementation, and evaluation of its career and technical education programs. (Section 122(d)(12) of Perkins V)
- f. Include a copy of the local application template that the eligible agency will require eligible recipients to submit pursuant to section 134(b) of Perkins V. See Text Box 4 for the statutory requirements for local applications under section 134(b) of Perkins V.
- g. Include a copy of the comprehensive local needs assessment template and/or guidelines that the eligible agency will require of eligible recipients to meet the requirements of section 134(c) of Perkins V. See Text Box 5 for the requirements for the comprehensive local needs assessment under section 134(c) of Perkins V.
- h. Provide the eligible agency's definition for "size, scope, and quality" that will be used to make funds available to eligible recipients pursuant to section 135(b) of Perkins V.
- 3. Meeting the Needs of Special Populations
    - a. Describe the eligible agency's program strategies for special populations, including a description of how individuals who are members of special populations—
        - i. Will be provided with equal access to activities assisted under this Act;
        - ii. Will not be discriminated against on the basis of status as a member of a special population;
        - iii. Will be provided with programs designed to enable individuals who are members of special populations to meet or exceed State determined levels of performance described in section 113, and prepare special populations for further learning and for high-skill, high-wage, or in-demand industry sectors or occupations;
        - iv. Will be provided with appropriate accommodations; and

        - v. Will be provided instruction and work-based learning opportunities in integrated settings that support competitive, integrated employment. (Section 122(d)(9) of Perkins V)

- 4. Preparing Teachers and Faculty
    - a. Describe how the eligible agency will support the recruitment and preparation of teachers, including special education teachers, faculty, school principals, administrators, specialized instructional support personnel, and paraprofessionals to provide career and technical education instruction, leadership, and support, including professional development that provides the knowledge and skills needed to work with and improve instruction for special populations. (Section 122(d)(6) of Perkins V)

Text Box 4: Statutory Requirements of Local Applications

• (b) CONTENTS.—The eligible agency shall determine the requirements for local applications, except that each local application shall contain—

• (1) A description of the results of the comprehensive needs assessment conducted under subsection (c);

• (2) Information on the career and technical education course offerings and activities that the eligible recipient will provide with funds under this part, which shall include not less than 1 program of study approved by a State under section 124(b)(2), including—

o (A) How the results of the comprehensive needs assessment described in subsection (c) informed the selection of the specific career and technical education programs and activities selected to be funded;

o (B) A description of any new programs of study the eligible recipient will develop and submit to the State for approval; and

o (C) How students, including students who are members of special populations, will learn about their school's career and technical education course offerings and whether each course is part of a career and technical education program of study;

• (3) A description of how the eligible recipient, in collaboration with local workforce development boards and other local workforce agencies, one-stop delivery systems described in section 121(e)(2) of the Workforce Innovation and Opportunity Act (29 U.S.C. 3151(e)(2)), and other partners, will provide—

o (A) Career exploration and career development coursework, activities, or services;

o (B) Career information on employment opportunities that incorporate the most up-to-date information on high-skill, high-wage, or in-demand industry sectors or occupations, as determined by the comprehensive needs assessment described in subsection (c); and

o (C) An organized system of career guidance and academic counseling to students before enrolling and while participating in a career and technical education program;

- (4) A description of how the eligible recipient will improve the academic and technical skills of students participating in career and technical education programs by strengthening the academic and career and technical education components of such programs through the integration of coherent and rigorous content aligned with challenging academic standards and relevant career and technical education programs to ensure learning in the subjects that constitute a well-rounded education (as defined in section 8101 of the Elementary and Secondary Education Act of 1965);

- (5) A description of how the eligible recipient will—

o (A) Provide activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations that will lead to self-sufficiency;

o (B) Prepare CTE participants for non-traditional fields;

o (C) Provide equal access for special populations to career and technical education courses, programs, and programs of study; and

o D) Ensure that members of special populations will not be discriminated against on the basis of their status as members of special populations;

- (6) A description of the work-based learning opportunities that the eligible recipient will provide to students participating in career and technical education programs and how the recipient will work with representatives from employers to develop or expand work-based learning opportunities for career and technical education students, as applicable;

- (7) A description of how the eligible recipient will provide students participating in career and technical education programs with the opportunity to gain postsecondary credit while still attending high school, such as through dual or concurrent enrollment programs or early college high school, as practicable;

- (8) A description of how the eligible recipient will coordinate with the eligible agency and institutions of higher education to support the recruitment, preparation, retention, and training, including professional development, of teachers, faculty, administrators, and specialized instructional support personnel and paraprofessionals who meet applicable State certification and licensure requirements (including any requirements met through alternative routes to certification), including individuals from groups underrepresented in the teaching profession; and

- (9) A description of how the eligible recipient will address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions such recipient will take to eliminate those disparities or gaps.

(Section 134(b) of Perkins V)

Text Box 5: Statutory Requirements for Comprehensive Local Needs Assessment

- (c) COMPREHENSIVE NEEDS ASSESSMENT.—
- (1) IN GENERAL.—To be eligible to receive financial assistance under this part, an eligible recipient shall—
  - (A) Conduct a comprehensive local needs assessment related to career and technical education and include the results of the needs assessment in the local application submitted under subsection (a); and
  - (B) Not less than once every 2 years, update such comprehensive local needs assessment.
- (2) REQUIREMENTS.—The comprehensive local needs assessment described in paragraph
  - (1) Shall include each of the following:
  - (A) An evaluation of the performance of the students served by the eligible recipient with respect to State determined and local levels of performance established pursuant to section 113, including an evaluation of performance for special populations and each subgroup described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965.
  - (B) A description of how career and technical education programs offered by the eligible recipient are—(i) sufficient in size, scope, and quality to meet the needs of all students served by the eligible recipient; and (ii)(I) aligned to State, regional, Tribal, or local in-demand industry sectors or occupations identified by the State workforce development board described in section 101 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3111) (referred to in this section as the ''State board'') or local workforce development board, including career pathways, where appropriate; or (II) designed to meet local education or economic needs not identified by State boards or local workforce development boards.
  - (C) An evaluation of progress toward the implementation of career and technical education programs and programs of study.
  - (D) A description of how the eligible recipient will improve recruitment, retention, and training of career and technical education teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in such professions.
  - (E) A description of progress toward implementation of equal access to high-quality career and technical education courses and programs of study for all students, including—(i) strategies to overcome barriers that result in lower rates of access to, or performance gaps in, the courses and programs for special populations; (ii) providing programs that are designed to enable special populations to meet the local levels of performance; and (iii) providing activities to prepare special populations for high-skill, high-wage, or in-demand industry sectors or occupations in competitive, integrated settings that will lead to self-sufficiency.

(Section 134(c) of Perkins V)

[1]Based on the context of this requirement, the reference to the local application process under "section 132" appears to be a typographical error in the Perkins V statute. The correct section for local applications in Perkins V is section 134. Therefore, eligible agencies should respond to this item using the provisions in section 134 of Perkins V.

- ***I.B.1.a. Provide a summary of State-supported workforce development activities (including education and training) in the State, including the degree to which the State's career and technical education programs and programs of study are aligned with and address the education and skill needs of the employers in the State identified by the State workforce development board. (Section 122(d)(1) of Perkins V)*** *CTE Board of Trustees* The Rhode Island CTE Board of Trustees (CTE Board) is a statutorily-created board that establishes policies and provides oversight to Rhode Island's CTE programs and the use of state and federal resources related to CTE. The CTE Board was created by Rhode Island General Law 16-53 in 2014 to oversee an integrated and efficient CTE system in Rhode Island that is aligned to the real needs of Rhode Island's industries and economy. Members of the Board are appointed by the governor, and seats are reserved for state leaders from industry, government, and labor. The CTE Board holds public meetings on a regular basis to ensure that all stakeholders in the CTE landscape are fulfilling the state's commitment to prepare all students for success in college and career. The CTE Board oversees a number of statewide Industry Advisories, organized around specific industry sector. The specific industry sectors correspond to the US Department of Education's Career Clusters. Each of these advisories is composed of representatives from K-12 schools, industry, and postsecondary; the advisories are chaired by a representative from industry and education. Starting in 2016, these advisories began developing new, more rigorous, career-specific CTE program standards. CTE Board program standards are developed in the Industry Advisories, approved by the CTE Board, and adopted by RIDE. The CTE Board has approved over 50 program standards in all 16 clusters, including Priority Sectors. (See page 38 for a full discussion of Priority Sectors.) Each CTE Board Standard requires that students earn: Collectively, these CTE Board Standards are written by schools and employers, with a goal of schools meeting the needs of employers. All CTE programs must demonstrate their alignment to these standards and report out annually on their students' achievement of the culminating credentials. All CTE Board Standards are posted on the RIDE CTE website. According to statute, the CTE Board has 15 members, allocated in the following manner: *State-Approved CTE Programs* CTE in Rhode Island is designed for individuals who are interested in entering the workforce or are preparing for careers and want to take advantage of postsecondary education and training opportunities. With more than ten regional centers, 54 comprehensive high schools, charter schools, postsecondary institutions and adult programs in the network, Rhode Island learners have unprecedented access to a broad array of educational programs. CTE programs are required to: Since 2014, the number of CTE programs in the state of Rhode Island has increased from 70 to 226 (280% growth). Under Rhode Island's CTE Regulations,

passed in 2012, students may attend any CTE program in the state, regardless of their home district. This open enrollment policy ensures that 100% of high school students have access to CTE programming in a Priority Sector. *P-TECH* Pathways in Technology Early College High School (P-TECH) offers high school students the opportunity to earn an associate degree while in high school. The P-TECH initiative, based upon IBM's successful grade 9-14 model, helps Rhode Island's high school students prepare and train today for the jobs of tomorrow. Through collaboration between the state, school districts, the Community College of Rhode Island, and Rhode Island employers, the initial P-TECH programs opened at three high schools (Rogers High School in Newport, Providence Career and Technical Academy, and Westerly High School) in 2016. Two more P-TECH programs launched in fall 2017 at North Providence High School and Woonsocket Area Career and Technical Center. A vital aspect of the P-TECH model involves aligning high school and college coursework to employer needs, creating internships that prepare students to succeed in college and career, and industry mentorship. In 2019, Rhode Island Commerce announced the development of a Center for Advanced Manufacturing at William M. Davies, Jr. Career and Technical High School in Lincoln that is incorporating the key elements of the P-TECH model. *PrepareRI* Rhode Island has created an integrated and aligned statewide system to prepare all students for success in college and career. This umbrella initiative is called Prepare Rhode Island (PrepareRI). PrepareRI launched in 2017, based on a multi-year, interagency PrepareRI Action Plan written jointly by the Governor's Office, the Rhode Island Department of Education, the Governor's Workforce Board, the Office of the Postsecondary Commissioner, and Rhode Island Commerce. Prepare Rhode Island is one of the most ambitious plans in the nation to improve career readiness. It represents a strategic partnership between the Rhode Island government, private industry leaders, the public education system, universities, and non-profits across the state. 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. The goals for the PrepareRI initiative parallel the goals of the Rhode Island CTE Board of Trustees (CTE Board). *Governor's Workforce Board (GWB)* 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's Board consists of industry leaders from across the state who are appointed by the Governor to oversee workforce development activities statewide. Local Workforce Investment Boards (WIBs) fall under the auspices of GWB, which is part of the PrepareRI umbrella. GWB also has a seat on the CTE Board to further ensure alignment between the CTE Board and the workforce investment boards. *State Initiatives to Increase Career Readiness Internship Program* Part of PrepareRI's approach has been to work with a Statewide Career Readiness Intermediary to form a bridge between businesses and schools. The organization that won the contract for this intermediary role, Skills for Rhode Island's Future, designed and implemented a summer internship program. Starting in summer 2018, the PrepareRI Internship

Program began placing Rhode Island high school juniors in paid summer internships with the state's top employers in a range of industries. Through a partnership with a local college, students also earn college credit for completing the internship. The internship program benefits 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 Rhode Island's future economy vibrant and strong. The PrepareRI Internship Program has seen tremendous growth, interest and success from both students and employers. In the second year of the program (2019), over 10% of all 11th grade students in the state applied. This level of interest is partially the result of an intensive recruitment and awareness campaign from Skills for Rhode Island Future, which placed an emphasis on recruiting students of color and students attending schools with high poverty rates. In 2019, over 326 students were accepted to the program and completed all requirements. Rhode Island plans on continuing to expand the PrepareRI Internship Program in coming years. *Computer Science for Rhode Island* Computer Science for Rhode Island (CS4RI) is among the most comprehensive statewide computer science initiatives in the country. CS4RI uses a coalition approach by combining national initiatives with local expertise to increase and broaden participation in quality computer science education and professional development. This ensures that computer science learning opportunities and access are available to all Rhode Island students in the years ahead. In 2015, prior to the launch of CS4RI, only 1% of Rhode Island high school students enrolled in Computer Science (CS) courses and 42 students took the Advanced Placement Computer Science exam. No students of color passed. Today Rhode Island is proud to be among the national leaders in CS education with CS offered in 100% of its school districts and every school in the state participating in CS4RI. Many of these CS programs are state-approved programs, and RIDE aims to increase that number. Through this effort, Rhode Island has seen record adoption of new CS programs in schools around the state, tripled the number of AP programs, and achieved more than a 500% increase in the number of students taking an AP CS exam since 2015. CS4RI has trained more than 940 educators through free, high-quality CS professional development programs, and empowered students to earn more than 2,500 computer science college credits while still in high school at no cost to the students. 18 out of 32 districts have students taking Computer Science related Concurrent or Dual Enrollment Courses through the University of Rhode Island; of those eighteen districts, eight (44%) are urban districts. On an annual basis, the CS4RI Summit brings together over 2,000 high school and college students, industry professionals, training providers, and community members to showcase projects, research, education, and career opportunities related to computer science and technology. The goal is to excite students from across Rhode Island with the varied educational and career opportunities that result from studying computer science. *PrepareRI Dual Enrollment Fund* Rhode Island is committed to supporting students in taking college courses to

earn credit while still in high school. In 2013, the Rhode Island General Assembly passed legislation (RIGL 16-100) that called for the adoption of a statewide policy for dual enrollment that allows students to take college courses to earn credit at both the secondary school and the higher education institution. Subsequently, the Board of Education adopted regulations in April of 2015 that provide all qualified Rhode Island high school students access to college level coursework while still in high school. The PrepareRI Dual Enrollment Fund allows any public high school student to access dual enrollment courses with University of Rhode Island (URI), Rhode Island College (RIC), and Community College of Rhode Island (CCRI) at no cost to the student or their family. Each public college has both concurrent and dual enrollment opportunities available to students covered by the PrepareRI Dual Enrollment Fund, but each school has different names for their respective programs. Students can access college-level courses in two ways by taking: *Apprenticeships* Rhode Island has two comprehensive apprenticeship programs, the PrepareRI Youth Apprenticeship program (PRIYA) and Propel America (Propel). PRIYA is an opportunity for high school seniors to earn while they learn, embarking on a specific career pathway while still in high school. Career pathways available for the 2019-2020 school year include: Pharmacy Technician, Medical Assistant, Process Technologist, and Horticultural and Landscape Technician. PRIYA students are high school seniors that enroll full-time at the Community College of Rhode Island (CCRI), through its Running Start program. Students work part-time, take classes that directly relate to their employment experience, and work closely with their employer and CCRI to coordinate the beginning of a career path while still in high school. Each employer partner works closely with CCRI staff to coordinate touchpoints to CCRI coursework and guidance to and through associate degree programs that directly link to the student's work and career development. Employers are committed to offering flexible scheduling that allows a student to continue working after high school, while a student is working towards a degree at CCRI through the Rhode Island Running Start or enrichment programs. Propel America (Propel) is a national nonprofit that helps young adults go from high school into a strong career and higher education within one year of high school graduation. Propel connects high schools, job-training organizations, community colleges, and local employers to build a clear path forward for students. Propel is only available to second semester seniors that are due to graduate in the spring. *Individual Learning Plans (ILPs)* As part of RIDE's strategy to prepare every student for college and career, every child in Rhode Island in grades 6-12 is now required to have an Individual Learning Plan (ILP). The ILP is a student-directed planning and monitoring tool that customizes learning opportunities throughout students' secondary school experiences, broadens their perspectives, and supports the attainment of goals. The ILP documents students' interests, needs, supports, course selections (including access to college-level programming), transition placements, and other learning experiences both in and out of school. This information produces a thoughtful program of study leading to proficiency for graduation and postsecondary experiences. The ILP is more than a repository of information about a student; it is a dynamic tool that maps academic

plans, and reflects each student's unique set of interests, needs, learning goals and graduation requirements. The ILP process engages all students in a way that advances goal setting, decision-making, and self-advocacy skills that support their lifelong learning. To support the implementation of ILPs RIDE has: *Career Exploration Grants* PrepareRI has developed the Career Exploration Grant program to support schools in implementing strong career awareness programs beginning in middle school. The grants are intended to accelerate the integration of career exploration activities with existing learning experiences in middle school to help expose students to careers in Priority Sectors. Career Exploration Grants require a partnership between middle schools and industry. In 2019, 18 schools received this grant and are benefiting from ongoing support provided by RIDE and the CTE Board. For a more detailed discussion of Career Exploration Grants see Section II.C.2.a on page 62. School Report Cards: Postsecondary Success Index RIDE values transparency and believes that education data should be as accessible and easy-to-understand as possible. In 2018, as part of the state's updated system of school accountability under the Every Student Succeeds Act (ESSA), the federal education law, Rhode Island created a new and user-friendly Report Card platform that makes it easier than ever for students, educators, and families to understand how their school community is performing. The Report Card platform displays a range of education data, including student performance, school-level spending, and the results of the state's annual school climate and culture survey (called SurveyWorks). In 2019, RIDE released new two measures for high schools, collectively called "Diploma Plus." The name refers to the fact that, in today's economy, students need to graduate with a diploma *plus* additional credentials and specialization. One of the Diploma Plus metrics, called the Postsecondary Success Index, measures how many students graduate with industry-recognized credentials (as defined by the CTE Board) and/or college credit. This index provides schools with a clear incentive to improve their students' career readiness through CTE. *PrepareRI Ambassadors* The PrepareRI Ambassadors are a select group of education leaders who use their expertise, knowledge, and connections to advance PrepareRI's goal of building career pathways for all Rhode Island youth. The Ambassadors have diverse backgrounds, and may be currently working as a superintendent, district administrator, principal, school administrator, teacher, college professor or administrator, community leader, or any other position related to youth career pathways. They have supported RIDE and the CTE Board in understanding the needs of our schools as they advise on the development of policies including work-based learning, subcommittee standards, and teacher certification. Ambassadors continue to work full-time in their previous roles, but commit five hours per week to their Ambassadorship and receive a small stipend. Ambassadors advance PrepareRI's goals in three key ways. First, the Ambassadors create a toolkit that helps stakeholders in the state implement some component of the PrepareRI Action Plan. Second, the Ambassadors serve as policy advisors, leveraging their expertise to provide feedback and insights to PrepareRI's core team and their fellow ambassadors. Third, Ambassadors are spokespeople for PrepareRI, spreading the

goals of PrepareRI through their professional networks, and validating the importance of PrepareRI through their endorsement and participation. ***II.B.1.b. Describe the State's strategic vision and set of goals for preparing an educated and skilled workforce (including special populations) and for meeting the skilled workforce needs of employers, including in existing and emerging in-demand industry sectors and occupations as identified by the State, and how the State's career and technical education programs will help to meet these goals. (Section 122(d)(2) of Perkins V)*** *Governor's Vision* 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. PrepareRI is the structure Governor Raimondo has used to advance this vision. Stated succinctly, the mission of PrepareRI is to: **Prepare all Rhode Island students for success in college and career** PrepareRI is built around a four-stage process of workforce preparation for all students: 1. Career exploration: Starting no later than 6th grade, students explore a variety of different industries and job sectors to discover their passions. Students then work with a school counselor (or other faculty member) to create an Individual Learning Plan (ILP), which becomes a roadmap to their future career. *Goals* The CTE Board has partnered with RIDE to develop long-term goals for CTE. The CTE Board is the driver of creating standards and providing program oversight to ensure students will be prepared to meet the current and future needs of industry, and grow the state's economy. In order to fulfill this mission, 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 students, 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. The long-term goal for Rhode Island's CTE programs is for Rhode Island youth to have a job, be enrolled in an educational program, or enlist in the military within six months of graduation. CTE Programs' Role in Preparing a Skilled Workforce To achieve the state's long-term goals, CTE programs will: RIDE's Office of College and Career Readiness (OCCR) achieves these goals by defining core values and using them to guide how the office operates and makes decisions. OCCR is guided by these four core values: Equity is a foundational value of RIDE and the CTE Board. Our CTE system is based on the belief that <u>all</u> students will be prepared for

college and career success. Students from special populations will succeed when provided with the necessary resources and supports. It is the state's responsibility to provide those resources and supports to help all of Rhode Island's students thrive in the state's economy. ***II.B.1.c. Describe the State's strategy for any joint planning, alignment, coordination, and leveraging of funds between the State's career and technical education programs and programs of study with the State's workforce development system, to achieve the strategic vision and goals described in section 122(d)(2) of Perkins V, including the core programs defined in section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102) and the elements related to system alignment under section 102(b)(2)(B) of such Act (29 U.S.C. 3112(b)(2)(B)); and for programs carried out under this title with other Federal programs, which may include programs funded under the Elementary and Secondary Education Act of 1965 and the Higher Education Act of 1965. (Section 122(d)(3) of Perkins V)*** *CTE Board of Trustees* The Board of Trustees is an employer-majority board responsible for ensuring a comprehensive and coordinated career and technical education system within the state. The 15-member board includes representatives from the private sector, K-12 education, postsecondary education, workforce boards, and economic development agencies. For more information on the CTE Board, see Section II.B.1.a on page 12. For more information on how the CTE Board sets standards for CTE programs, see section II.B.2.a on page 29. *CTE Statewide Industry Advisories* The CTE Board oversees a number of statewide Industry Advisories, organized around specific industry sectors, which correspond to US ED Career Clusters. Each of these advisories is composed of representatives from schools and industry, and are chaired by a representative from industry and education. For more information on the statewide Industry Advisories, see Section II.B.1.a on page 12. *Alignment to Priority Industry Sectors* Determining Priority Sectors involves expertise in economic modelling, analyzing labor market information, and surveying trends in the local economic landscape. RIDE and the CTE Board rely on the Rhode Island's Long-Term Economic Development Plan, required by state statute and overseen by Rhode Island Commerce, to make these determinations. RIDE and CTE Board, with the advice of the Governor's Workforce Board, maps the plan's Priority Sectors to specific fields in the CTE Board Standards. RIDE and the CTE Board (including the related state agencies of the Governor's Office, Commerce, Office of Postsecondary Commissioner, and Governor's Workforce Board) work to ensure CTE programs in the state provide students with a breadth of offerings, but emphasize growth in Priority Sectors. Priority Sectors are industry sectors that are high-skill and high-demand. Rhode Island's CTE system will prepare students for jobs that will provide a rewarding career that will grow over the course of their lifetimes. For more information on the Priority Sector determination, please see section II.B.2.c.iii on page 38. *CTE Program Approval* Programs must demonstrate industry role in curriculum identification, and overall program endorsement, as part of the approval process. Through the program approval process, schools must provide letters of support from employers and assure ongoing industry involvement through advisory and work-based

learning. Programs must maintain industry relationships and ensure students complete work-based learning as part of each program. The growth of the CTE Industry Advisories has increased the presence of industry in all state programs and supporting schools by aligning programs to employer-identified skills. As identified in the state's WIOA industry and workforce analysis, employers have highlighted a need for all students to be prepared with employability skills and STEM-related skillsets. Program needs are validated through labor market information and student demand. RIDE, Governor's Workforce Board (GWB), and the CTE Board have identified and prioritized work-based learning as a primary strategy for ensuring all students are able to gain these critical employability skills. *Funding for CTE programs* In addition to federal Perkins dollars, RIDE further supports CTE programs with Rhode Island state CTE Categorical Funding. To encourage growth in Priority Sectors, starting in FY19, CTE Categorical Funds are only generated by, and used for, programs in Priority Sectors. Programs receiving CTE Categorical Funds will report on the use of their funds to RIDE and the CTE Board on a quarterly basis. *Statewide Action Plan* In 2016, Rhode Island developed an interagency PrepareRI Action Plan for education and workforce by 2020. The plan led to dramatic improvements in Rhode Island career preparation landscape. Rhode Island is currently in the process of developing a new five-year plan, for 2020-2025. This plan is being developed to integrate and align directly with this Perkins V plan and the state's WIOA plan, all of which are being drafted together. *PrepareRI* Over the past five years, Rhode Island has worked to align priorities, resources, and processes across the state agencies responsible for economic and workforce development. To build on this work, Rhode Island has decided to submit the Rhode Island State Plan in the overall WIOA state plan. This will help to ensure continued coordination between the responsible agencies. RIDE plans to continue a core inter-agency working group, known as the PrepareRI Core Team, which had been developed to facilitate inter-agency cooperation to build career pathways for all Rhode Island youth. This group is comprised of representatives from the following agencies: Starting in 2017, the PrepareRI Core Team began meeting weekly to leverage the collective power of the major players in Rhode Island's workforce development landscape around a common action plan. The Core Team establishes new strategic priorities, adopted from the long-term Action Plan, every six months and sets monthly benchmarks for expected progress. The Core Team tracks progress on those priorities during every meeting. In addition to policy and program alignment, this group works to align resources including the coordination of related state and federal funds. This has led to a dramatic increase in programs supporting students' career readiness, as outlined in Section II.B.2.a on page 29. Once a month, the PrepareRI Core Team provides updates to the leaders of the each of the agencies listed above. Members of this group include: the Commissioner of Elementary and Secondary Education, the Postsecondary Commissioner, the Director of the Department of Labor and Training, the Executive Director of the Governor's Workforce Board, and senior representatives of the Governor. Status updates are given through a conference call coupled with a PowerPoint presentation. Important policy decisions and ways to

continue to eliminate barriers for important stakeholders are also discussed during these meetings. Given the success of the PrepareRI initiative, the Commissioner for RIDE has pushed for the idea of inter-agency teams as a best practice for similar initiatives. In December 2019, the state launched an Adult Education Interagency Core Team. This team is based on the PrepareRI model and brings together a similar group of agencies to better unite the state's efforts to prepare adults for jobs. *Workforce Development Legislation* The strength of the PrepareRI Core Team is that it brings together important stakeholders on a weekly basis, including most of the agencies that oversee workforce development legislation in Rhode Island. This legislation includes: *Governor's Workforce Board (GWB)* 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. *Governor's Workforce Board (GWB) Advisory Committees* RIDE relies on two specific advisory committees to provide input and guidance regarding CTE programs: the Education and Employment Advisory Committee (EEAC) and the Career Pathways Advisory Committee (CPAC). EEAC is responsible for overseeing programs that ensure adults and out-of-school youth in/or approaching participation in the labor force have access and opportunity to obtain industry and/or postsecondary credentials, and jobs that provide living wages. CPAC is responsible for overseeing the development and growth of career pathways that connect populations throughout the state with career opportunities. Central to this function is overseeing execution of the state's PrepareRI Action Plan to provide all youth K-24 with access to flexible and quality career pathways programming through high quality delivery models inclusive of, and beyond, traditional CTE. This includes monitoring the implementation of a mixed-delivery career pathways system and holding various parties accountable for outcomes. RIDE makes it a priority to attend both committee meetings to provide input and support. *WIOA Planning* Weekly meetings of the PrepareRI Core Team facilitated the coordination of alignment between the development of the Perkins Plan and the Workforce Innovation and Opportunity Act (WIOA) Plan. The Core Team recognized an opportunity to align all policies affecting workforce development. This proactive approach will allow key agencies to serve more youth and adult learners in the state of Rhode Island. Youth with Alternative Learning Plans, as well as Opportunity Youth were taken into deep consideration when formulating both plans. (Opportunity Youth are defined as young people between the ages of 16 and 24 who are neither enrolled in school nor participating in the labor market.) Members of the PrepareRI Core Team were intentional about attending Stakeholder Engagement Sessions for both plans. ***II.B.1.d. Describe how the eligible agency will use State leadership funds made available under section 112(a)(2) of the Act for purposes under section***

124 of the Act. (Section 122(d)(7) of Perkins V) Each year, Rhode Island will reserve up to 10% of the federal Perkins allocation for the following uses:

- **Academic skills.** All of the CTE Board Standards include requirements for both academic coursework and technical coursework. The CTE Board recognized that students cannot be career-ready if they do not have academic skills. Proficiency in reading, writing, math, and other subjects are foundational to both college and career success. All of these academic skills are also connected to relevant majors at Rhode Island's postsecondary institutions.
- **Industry-recognized credentials and/or college credit**. The decision about what counts as an "industry-recognized credential" is made by industry representatives and is formally adopted by the CTE Board. This ensures Rhode Island's CTE programs are meeting the specific needs of actual Rhode Island employers. The credentials of value also align with Rhode Island's WIOA plan and the state's overall credentials system.
- **Coursework and curriculum.** The CTE Board Standards outline approved curricula or course sequences that help students earn the industry-recognized credentials and college credit described above.
- **Work-based learning.** The CTE Board Standards may include work-based learning requirements. These standards outline the specific needs of employers in that career field. These career field standards build upon the minimum criteria set by the Governor's Workforce Board, but provide more rigorous requirements and detail relevant to the specific industry.
- **Employability skills.** Recognizing that employability skills are essential to students' success in the workplace, the CTE Board Standards will clarify the specific skills that students should be developing for the workplace.
- Nine individuals who are representative of the private employment sector:
- Five representatives of business, industry, and agriculture:
- Two members who are representatives of general business concerns
- One member who is a representative of small business concerns
- One member who is a private sector member of the governor's workforce board, or the Rhode Island workforce investment board, or state job training coordinating council (established pursuant to section 122 of the Job Training Partnership Act, 29 U.S.C. § 1532)
- One member who is a representative of the CTE Trust
- Two members who are representatives of labor organizations, one of whom must be a career and technical teacher
- Two members from trade associations representing employers in the state

- Five individuals who are representative of secondary and postsecondary educational institutions, including:
- One member who is a representative of the Rhode Island School Superintendents Association
- One member who is a representative or the director of career and technical education programs and/or facilities
- The commissioner of elementary and secondary education, or his/her designee
- The commissioner of higher education, or his/her designee
- One member who is a representative of adult education and skills training
- The secretary of commerce or his/her designee shall be the fifteenth (15th) member ex officio
- Align to a set of industry-specific career program standards established by the CTE Board
- Include a series of at least three non-duplicative courses, including academic coursework
- Include work-based learning experience for every student aligned to Governor's Workforce Board Guidance and, as applicable, any CTE Board work-based learning standards
- Allow students to earn "culminating credential" of an industry-recognized credential and/or postsecondary credit, as established by the CTE Board
- Help students develop employability skills
- **Concurrent enrollment courses at their high school:** these courses are the same courses that are taught at the college but are approved to be taught at the high school, by the high school teacher.
- **Dual enrollment courses at the institution's campus:** these courses are part of the institution's regular schedule and are taught by a college professor.
- Created an ILP framework, adoption toolkit, and school adoption success plan
- Created a menu of state approved ILP platform vendors and provides increased support and training for counselors
- Expanded career exploration programming in middle schools through grants, partnerships with quality curriculum providers, and career fairs
- Hosted the Junior Achievement career fair, which supported nearly 50% of Rhode Island's 8th graders

- **Expertise:** Starting in high school, students build expertise and content knowledge in their specific career field of interest. Students learn through CTE programs and college-level coursework aligned to real-world requirements of their future career.
- **Experience:** While skills and knowledge gained in the classroom is important, true mastery involves students applying their skills in the real world of work. All high school students should participate in a rigorous work-based learning experience, such as internships, apprenticeships, industry projects, service learning, or school-based enterprises.
- **Career:** Following high school or postsecondary (depending on the career field), students enter the workforce in a high-wage, high-demand industry aligned to their passions.
- Align to Rhode Island's **Priority Sectors** and emerging industries, wherever possible, to prepare students for the future Rhode Island economy
- Provide students with the **core academic skills** needed for college and career success
- Allow students to earn **college credits and/or an industry-recognized credentials** of value
- Provide students with access to high-quality, rigorous **work-based learning** experiences that include the development of identified employability skills that meet the CTE Board Standards
- Connect to **career exploration** programming in middle schools and students' Individual Learning Plans (ILPs) with a focus on awareness of Priority Sectors and emerging industries
- Use **data-driven decision-making**, with the oversight and collaboration of the CTE Board and RIDE
- **Align and leverage funding** sources to ensure the quality and growth of CTE programming
- Build a pipeline of **qualified CTE teachers**, and continuously improve the practice of the existing teacher workforce through professional learning
- **Equity:** We value diversity, and provide whatever supports are needed to help all people achieve excellence.
- **Learning:** We are always hungry to do better, and constantly seek out new opportunities for growth.
- **Results:** We are unwavering in our goals, but flexible in our approach.
- **Partnership:** We break down barriers so we can go further together.

- Governor's Office (GO)
- Department of Labor and Training (DLT)
- Governor's Workforce Board (GWB)
- RIDE
- Rhode Island Commerce
- Office of Postsecondary Commissioner (OPC)
- Community College of Rhode Island (CCRI)
- Other agencies and/or organizations that lead core programs or policies related to workforce readiness of RI students and adults
- RIDE
- Strengthening Career & Technical Education for the 21st Century Act (Perkins V)
- Adult Education and Family Literacy (WIOA Title II)
- Department of Labor and Training (DLT)
- Adult (Title I)
- Dislocated Worker (Title I)
- Youth (Title I)
- Wagner-Peyser (Wagner-Peyser Act, as amended by Title III)
- 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)
- Department of Human Services (DHS)
- Temporary Assistance for Needy Families (TANF) Program (42 U.S.C.)
- Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV)
- Provide **technical assistance** to grant recipients including: the use of data for continuous improvement as measured by federal and state metrics; building, maintaining, and strengthening recipient partnerships with industry and community partners; and increasing alignment of policy and programs in support of secondary to postsecondary education transition. The exact amount dedicated to this each year may vary.

- Conduct **evaluations** of effectiveness of CTE-related technical assistance, policy, and/or programs implemented at the state or local level.
- Increase school buy-in and support of **Career and Technical Student Organizations (CTSOs)** by dedicating a portion of leadership funds earmarked for these organizations to be distributed to schools through the secondary formula.
- Develop, implement and maintain **centralized resources** to support student, family and community access to information regarding CTE opportunities, with a focus on ensuring this information is accessible to special populations.
- Provide funding and support to **incarcerated youth and adults** to receive industry-aligned career and technical education. Rhode Island will reserve at least 2% of its state allocation per Perkins law.

II.B.2. Implementing Career and Technical Education Programs and Programs of Study

II.B.2.a. Describe the career and technical education programs or programs of study that will be supported, developed, or improved at the State level, including descriptions of the programs of study to be developed at the State level and made available for adoption by eligible recipients. (Section 122(d)(4)(A) of Perkins V).

Industry-led development of CTE standards

Rhode Island, through the CTE Board of Trustees (CTE Board), has developed state standards for secondary programs within all 16 career clusters identified by the US Department of Education. These CTE Board Standards identify requirements for coursework, expected postsecondary outcomes (including a "culminating credential" of either industry credentials and/or postsecondary credits), work-based learning, and employability skills. The CTE Board Standards that have been approved by the CTE Board and adopted by RIDE can be found on the RIDE CTE website.

CTE Board Standards are developed by statewide CTE Board Advisories, subcommittees of the CTE Board that are organized around major industry sectors or career clusters. These Advisories are led by two co-chairs: one from industry and one from education. The CTE Board of Trustees voted in 2019 to add representatives from public institutions of higher education as non-voting members of the Board, and to add postsecondary co-chairs to the sector-specific subcommittees. This creates an additional line of continuous communication and collaboration between secondary and postsecondary eligible recipients. The intention of the CTE Board Advisories is to ensure that students graduate high school both college and career ready. The Advisory for each industry sector drafts the CTE Board Standards for career fields within that industry. Once finalized, these standards are presented to the full CTE Board for a vote. If approved by the CTE Board, the standards are sent to RIDE for implementation.

All CTE Board of Trustees Standards include the following components:

- CTE curriculum and coursework requirements, including at least a three-course, non-duplicative sequence
- Academic course requirements
- A “culminating credential” of an industry-recognized credential and/or postsecondary credit
- Work-based learning requirements aligned to the Governor’s Workforce Board (GWB) guidance, and any relevant CTE Board work-based learning standards
- Industry-specific labor market information, job outlook information, and occupations related to this career cluster
- Identification and development of relevant employability skills
- Any required teacher certifications, as identified by RIDE

Connecting secondary and postsecondary

Each of the secondary CTE programs is mapped to an aligned “Guided Pathway” at the Community College of Rhode Island (CCRI) and University of Rhode Island (URI). Guided Pathways are groups of majors at URI and CCRI, similar to career clusters.

RIDE has mapped the CTE Board Standards for secondary programs to postsecondary Guided Pathways, so all students can easily follow a CTE program of study that spans secondary and postsecondary.

II.B.2.b.i Describe the process and criteria to be used for approving locally developed programs of study or career pathways, including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 132 will promote continuous improvement in academic achievement and technical skill attainment;

Program Approval and Renewal

Secondary Programs

For secondary programs, RIDE and the CTE Board has established a program approval process in which programs may be approved for terms of up to five years. Components of the application include:

- Evidence of meeting the RIDE CTE Regulations from 2012
- Indicating which of the aforementioned CTE Board Standards the program will meet.
- Demonstrating industry involvement in the development of the program and courses.

- Identifying school-level personnel who will attend regular statewide CTE Board Advisory meetings pertaining to the program's sector.
- Identifying the teachers for the courses in the sequence, and providing evidence of proper certification.
- Identifying intentional, coordinated alignment of academic, technical, and employability skills.
- Indicating how the program will collect and analyze disaggregated data to support continuous improvement and confirm their state reporting abilities for the state CTE Program accountability system.
- Identifying work-based learning experiences that all students will complete, and which meet GWB guidance and any CTE Board work-based learning standards.

RIDE reviews applications for new CTE programs, and presents its recommendations to the CTE Board for discussion and vote, which may include input from the CTE Advisories. RIDE issues official letters of approval to programs.

RIDE-approved CTE programs will be given an approval designation for up to five years and RIDE reserves the right to withdraw RIDE-approved designation if there are major changes in the structure of the program from what was originally approved, or if student outcomes are consistently not meeting expectations.

Postsecondary Programs

For postsecondary programs, programs will apply through an annual Perkins funding application in which they must demonstrate industry demand, alignment and credit contributions towards available degree programs, data collection mechanisms and processes for analyzing collected data for the purposes of continuous improvement. RIDE-approved CTE programs will be given an approval designation for up to five years, and RIDE reserves the right to withdraw RIDE-approved designation if there are major changes in the structure of the program from what was originally approved, or if student outcomes are consistently not meeting expectations.

CTE Program Report Cards

Beginning in 2019, RIDE began releasing CTE Program Report Cards. These report cards are modeled on the school-level Report Card RIDE releases under ESSA. The goal of the report cards is to provide more transparency and accountability for programs, allowing districts, schools, and families to make data-driven decisions about the quality of CTE programs in their community.

The CTE Program Report Card metrics were approved by the CTE Board in winter 2018. The metrics are:

- Program Completion Rate

- This is Perkins metric 5S5
- Graduation rate
- This is Perkins metric 1S1 and 1S3
- Postsecondary outcome
- This is Perkins metric 3S1
- RIDE is also exploring the possibility of analyzing the post-program wage data for graduates, using the statewide longitudinal data system.
- Equity
- Participation gap: difference in the percentage of students from each subgroup who are participants in the CTE program compared to their percentage among the entire school population.
- Completion gap: difference in the percentage of students from each subgroup who are *completers* (as defined in metric 5S5) in the CTE program compared to their percentage among the entire school population.

Professional Learning through CTE Board Industry Subcommittees

CTE Board Advisories meet, at a minimum, twice each academic year. During these meetings, the Advisories may: review overall program operations, identify or validate instructor professional development opportunities, propose any modifications to the CTE Board Standards in their industry cluster or develop a new career-specific standard for growth occupations or emerging industries.

II.B.2.b.ii Describe the process and criteria to be used for approving locally developed programs of study or career pathways, including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 132 will expand access to career and technical education for special populations.

Statewide Open Enrollment for CTE

Per the CTE Regulations passed in 2012 by Rhode Island's Council on Elementary and Secondary Education, all students shall have the right to request, from their resident Local Education Agency (LEA), access to a RIDE-approved career preparation program of their choice. This right of access shall be limited only by the following three conditions:

1. Availability of enrollment seats;
2. Geographic location; and,
3. Fair, equitable and reasonable admission standards.

Any student denied access to a career preparation program reserves the right of appeal through the policies and procedures managed by the LEA responsible for the denial of access.

Reporting on Admissions to CTE Programs

Local Education Agencies (LEAs) operating RIDE-approved CTE programs have the right to develop and employ appropriate program-specific admission criteria. All admission criteria should comply with all relevant state and federal civil rights laws and regulations. Admissions criteria should:

- Be clearly derived from the academic and instructional demands of the approved CTE program;
- Represent the minimum levels of student readiness so as to reasonably ensure student success in the CTE program;
- Adhere to all relevant RIDE-developed admissions standards; and,
- Not result in discriminatory admissions decisions.

LEAs that employ program-specific admission criteria should develop and implement an admissions policy that is formally adopted and made publicly available. The policy should include no less than (1) the admissions criteria used in the selection process; (2) the application process and continuing enrollment conditions; and (3) a review and appeal process for any student denied admissions to a RIDE approved CTE program.

To fill available seats, RIDE-approved CTE programs shall use a lottery process that fairly and equitably selects students from the entire pool of applicants meeting the minimum admissions standards. When applicable, LEAs shall retain the right to prioritize program enrollment for resident students.

Students denied access to a program based on the admissions process or admissions criteria reserve the right of appeal and the right to apply for another RIDE-approved CTE program of their choice.

Technical Assistance for Analyzing Data

Rhode Island will collect and analyze state and local program data, disaggregated by student subgroup. Recipients are required to review this data regularly for use in program improvement. Rhode Island will focus technical assistance on this analysis and program improvements in support of closing participation or performance gaps.

Expanding Access

RIDE is expanding access in a number of ways, including:

- Increasing marketing funds available to promote CTE opportunities;

- Launching a new Unified Enrollment Platform: This platform will provide students with the ability to enroll in different courses and programs available through RIDE in one centralized location; and
- Through Equity Grants: grants offered to CTE programs with the objective of closing participation or performance gaps. These grants require applicants to analyze program data, determine a root cause for any participation or performance gap by any student subgroup, and propose an actionable, sustainable solution for addressing the identified gap. Equity Grants are a way to ensure that programs are being designed with student access at the forefront.

II.B.2.b.iii Describe the process and criteria to be used for approving locally developed programs of study or career pathways, including how such programs address State workforce development and education needs and the criteria to assess the extent to which the local application under section 132 will support the inclusion of employability skills in programs of study and career pathways. (Section 122(d)(4)(B) of Perkins V).

Rhode Island will support the inclusion of employability skills in CTE programs by:

- The CTE Board, through the CTE Advisories will create a **definition of employability skills**, and develop a process for measurement of employability skills that will be required for approved secondary CTE programs.
- Changing funding and management of **career and technical education student organizations (CTSOs)** from flat state grants to school-driven investments aligned to programs offered in each school. Rhode Island's program approval will ask schools to indicate if they are aligning CTSOs to programs, how they will integrate into program curriculum and ensure program participation. Rhode Island sees strategic, aligned CTSOs as an opportunity for students to build employability skills. (See the funding section II.C.2.a. on page 62 for more information.)
- Ensuring that schools are utilizing comprehensive counseling programs, and in particular **Individual Learning Plans (ILP)**, to promote academic, career, and social emotional development. ILPs are required for all students beginning in sixth grade by the Council on Elementary and Secondary Education's Regulations Governing Secondary Education Environments. ILPs assist in guiding students in possible career paths, while empowering students to take the lead in their own growth.
- Including **work-based learning** as a statewide strategy for students to acquire employability skills. All students in CTE programs are required to meet the Governor's Workforce Board guidance and any relevant CTE Board work-based learning standards.
- Ensuring **postsecondary programs** identify ways that each program will integrate and assess employability skills.

II.B.2.c.i Describe how the eligible agency will make information on approved programs of study and career pathways (including career exploration, work-based learning opportunities, early college high schools, and dual or concurrent enrollment program opportunities) and guidance and advisement resources, available to students (and parents, as appropriate), representatives of secondary and postsecondary education, and special populations, and to the extent practicable, provide that information and those resources in a language students, parents, and educators can understand;

Unified Enrollment and Information System

While RIDE has an open enrollment policy for CTE programs within the state in Section II.B.1.a on page 14, students and families will only be able to take advantage of this policy if information on programs is easy to access and understand. With that in mind, Rhode Island will develop a centralized enrollment and information system. This tool will help students and families navigate the various programs available to them throughout the state.

Rhode Island has begun efforts to develop this during FY20, with plans to ultimately encompass all CTE, dual and concurrent enrollment, Advanced Course Network, Charter Schools and other opportunities in coming years. This system will include admission processes and enrollment procedures. In January 2020, RIDE issued an RFP for a vendor to fill this role.

Rhode Island will publish CTE Program Report Cards annually. These reports will help students and families make choices about the right opportunity for their needs, and will help schools to determine gaps and needs for program improvement. See Section II.B.2.b.i, page 32 for more information about the CTE Program Report Cards.

Sharing Information with Schools

RIDE is employing multiple channels of communication with school and district personnel to ensure they have the information they need to run successful CTE programs. The structures for communication with schools include:

- CTE Board Meetings and Industry Advisories
- The CTE Board holds public meetings on a regular basis to discuss matters of importance for CTE in the state. Industry Advisories meet to provide industry-sector specific information and discussions.
- Career Coordinators Network
- RIDE organizes statewide monthly meetings with Career Coordinators to disseminate relevant information. The Career Coordinators are staff members at high schools who serve as liaisons between RIDE, school administrators, and students. Currently, nearly 90% of high schools in the state have identified a Career Coordinator.
- PrepareRI Newsletter and Commissioner's Field Memo

- RIDE shares updates with people across the state, including all superintendents, principals, and teachers through the PrepareRI Newsletter (on a monthly basis) and the Commissioner's Field Memo (on a weekly basis).
- PrepareRI Ambassadors
- This group of education and community leaders help to guide PrepareRI's implementation. They use their unique perspective and skills to advise the PrepareRI team, create resources and trainings to help their colleagues, and serve as spokespeople for the initiative.
- PrepareRI Summits
- Educators and community influencers have an opportunity to gain professional development through PrepareRI Summits. Summits allow for the sharing of best practices, including the implementation toolkits developed by the PrepareRI Ambassadors.
- Employer groups
- Employer groups, trade associations, chambers of commerce, and other related stakeholders will share information relevant to their members.

Career Exploration

Before students fully commit to a CTE program in a particular career field, they should explore the many different possible careers available to them.

RIDE has developed the Career Exploration Grant program to support schools in implementing strong career awareness programs, beginning in middle school, which connect schools and industries, particularly those in Priority Sectors and emerging industries. RIDE began a pilot program of the Career Exploration Grant program in 2019, and provided grants to 18 middle schools. Starting in FY21, the Career Exploration Grants will be offered annually, using Rhode Island's Perkins Reserve Fund.

RIDE is also developing a database of resources to support academic, career, and social emotional development and goal setting as it relates to comprehensive counseling programs and Individual Learning Plans. This tool is targeted for use by educators and administrators in middle and high schools.

II.B.2.c.ii. Describe how the eligible agency will facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study and career pathways that include multiple entry and exit points;

Participation in CTE Board Advisories

To facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study, Rhode Island requires all state-approved programs to designate school-level personnel to regularly participate in CTE Board Advisories. The advisories are tasked with developing program standards, continuous improvement of state program expectations, and continued alignment with industry expectations, including (but not limited to) work-based learning and employability skills. The CTE Board Advisories are also expected to promote best practices for teaching CTE in their career field.

II.B.2.c.iii. Describe how the eligible agency will use State, regional, or local labor market data to determine alignment of eligible recipients' programs of study to the needs of the State, regional, or local economy, including in-demand industry sectors and occupations identified by the State board, and to align career and technical education with such needs, as appropriate;

Using Data to Define Priority Sectors

Under Rhode Island General Legislation 42-64.17, the state of Rhode Island must develop a "long-term economic development vision and policy for the state of Rhode Island" every four years. This report, hereafter called the Long-Term Economic Development Plan, provides a detailed analysis of Rhode Island's economy, based on labor market information, historical data, and likely future trends. Rhode Island Commerce manages this report. This report identifies the high-skill, high-demand industry sectors (hereafter called "Priority Sectors") in the state of Rhode Island.

RIDE and the CTE Board, in partnership with Rhode Island Commerce, the Department of Labor, and the Governor's Workforce Board, identify which CTE Board Standards and career fields fall under the Priority Sectors identified in the Long-Term Economic Development Plan.

The first such report was conducted by the Brooking Institution in 2016, and was entitled "Rhode Island Innovates." This report led to the identification of the following Priority Sectors:

- Bioscience
- Business
- Construction
- Defense
- Education & Training
- Healthcare
- Hospitality & Tourism
- Information Technology

- Manufacturing
- Marine Trades

RIDE and the CTE Board have adopted this list for use in prioritizing resources. In order to be eligible for Perkins dollars, all LEAs must have at least one state-approved program in a Priority Sector.

Rhode Island Commerce released an updated Long-Term Economic Development Plan in February 2020 under the title "Rhode Island Innovates 2.0." This new report will be used to update the list of Priority Sectors in the CTE Board Standards document.

Aligning State CTE Funding to Priority Sectors

RIDE will use state, regional, or local labor market data to determine the alignment of eligible recipients' programs of study to the needs of the state, regional, or local economy, including Priority Sectors, and to align career and technical education with such needs.

Established with the support and input of the CTE Funding Working Group in 2018 and the CTE Board, this approach to CTE funding applies the same process to all schools of choice: charters, state schools, and CTE programs. This formula factors in local per pupil costs, state share, and community wealth.

To be eligible for state CTE Categorical Funding, CTE programs must:

- Prepare students for careers in Priority Sectors; and
- Meet the program standards adopted by the CTE Board

Effective July 1, 2020, CTE Categorical Funding will be invested into the program that generated the funds. Funds may not be reallocated to different CTE programs within the same school.

Each recipient will be required to submit an annual expenditure report detailing how funding was invested. LEAs may request a waiver from some or all of this requirement. Waiver requests must be made to RIDE, which will evaluate the request based on standards set by the CTE Board and notify the CTE Board of any waivers granted at the CTE Board's next meeting. Schools are required to demonstrate business demand through the state program approval process and the local needs assessment.

Rhode Island General Law 16-53 outlines the duties and responsibilities of the CTE Board on the policy principles and goals that govern the distribution of financial assistance from state funds.

II.B.2.c.iv. Describe how the eligible agency will ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations;

RIDE will ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations through:

- The **program approval process**, which considers program recruitment, admission, enrollment and retention policies.
- The **program accountability system**, which reports disaggregated data whenever possible to identify participation and/or performance gaps by student population. RIDE will require programs that have consistent participation or performance gaps to conduct a root cause analysis and address the issue to continue to qualify for funding for the program.
- **State-coordinated communication** through a central information and enrollment platform to be developed in FY20 and FY21.

See Section II.B.3 on page 48 for more information.

II.B.2.c.v. Describe how the eligible agency will coordinate with the State board to support the local development of career pathways and articulate processes by which career pathways will be developed by local workforce development boards, as appropriate;

Rhode Island's Board of Education is the chief policy-setting body overseeing K-20 education in Rhode Island. Through its designated powers and duties, the Board helps shape the course of public education to ensure that all of the state's students receive the best possible education. The Board is divided into a Council of K-12 Education and a Council of Postsecondary Education.

The 17-member Rhode Island Board of Education was created by the Rhode Island General Assembly in 2014 and replaced the Board of Regents for Elementary and Secondary Education and the Board of Governors for Higher Education. This consolidated governance of all public education in Rhode Island is an innovative integration of policymaking and planning for elementary, secondary, and higher public education in our state.

In 2012, The Rhode Island Board of Regents for Elementary and Secondary Education approved and adopted, effective July 1, 2012, the Board of Regents Regulations Governing Career and Technical Education (CTE) in Rhode Island, which supersedes all previous rules and regulations pertaining to career and technical education and vocational education. This body is commonly called the CTE Board of Trustees (CTE Board). These regulations can be found on RIDE's CTE website.

RIDE is the eligible agency coordinate with the State Board and the CTE Board to support the local development of career pathways.

II.B.2.c.vi. Describe how the eligible agency will support effective and meaningful collaboration between secondary schools, postsecondary institutions, and employers to provide students with experience in, and understanding of, all aspects of an industry, which may include work-based learning such as internships, mentorships, simulated work environments, and other hands-on or inquiry-based learning activities; and

Work-based learning (WBL) allows students to apply their skills in a real-world setting and build competencies that will make them successful in their future careers. Therefore, RIDE and the CTE Board require that all CTE programs in the state include work-based learning.

The CTE Board has adopted the GWB Work-Based Learning Guidance in its standards for programs. Work-based learning in Rhode Island must meet the standards created by the Governor's Workforce Board's (GWB) guidance. CTE programs must also meet any additional work-based learning requirements included in the CTE Board Standards for their career field.

The GWB defines a work-based learning activity as a planned, structured learning experience that provides youth (ages 14-24, in school or out-of-school) with real-life or simulated work experiences where they can develop and apply academic, technical, and essential skills; and contributes to the achievement of their postsecondary and employment goal(s). The GWB is employing a flexible definition of WBL, encompassing the activities below:

- **Internship:** A position for a student or trainee to work in an organization, sometimes without pay, to gain work experience, satisfy requirements for a credential, and/or gain course credit.
- **Apprenticeship:** Highly-formal job training experience that involves studying with a master of the trade on the job.
- **Service learning:** A program or project which combines community service with an outside organization with a structured opportunity for reflection about that service, emphasizing the connections between service experiences and academic learning.
- **School-based enterprise:** Students produce and sell goods or services in the school and learn about business skills and entrepreneurship. This may be part of an entrepreneurship course, and a business professional may serve as a mentor and advisor for the enterprise.
- **Industry project:** Individual, group, or class-wide projects in which students address a real-world, industry-focused question or problem with the guidance of industry professionals.

The GWB recommends that schools, districts, industry partners, businesses, community-based organizations, and others engaged in work-based learning design and implement activities which are safe, follow all State and Federal labor laws, allow students to earn

academic credit and/or wages, and meet standards for quality outlined below, and in the additional detailed work-based learning guidance document.

- **Rigorous:** Skill-based and tied to measurable outcomes. The experience should allow a student to gain measurable skills, whether those be essential skills (also known as professional skills, soft skills, or 21st century skills) or hard technical skills. The entire activity, including corresponding classroom time, should encompass a minimum of eighty hours.
- **Relevant:** Connected to a student's interests, as indicated in his/her Individualized Learning Plan (ILP) and to the real world of work. Projects and tasks should mirror those that exist in a real workplace, and should align to Priority Sectors in Rhode Island.
- **Reflective:** Engages the student in reflection and analysis throughout and after the experience, including guided self-reflection (for example, through the ILP process) and meaningful evaluations from the industry professionals. In this process, students should connect the work-based learning experience to their academic work as well as future professional and educational goals.
- **Interactive:** Providing multiple and extended opportunities for students to interact with industry professionals, whether as supervisors, mentors, advisors, or collaborators.
- **Integrated:** Connected with the student's school-based curriculum. A work-based learning experience is a practical application of academic and/or technical learning and should allow the student to practice the theory learned in the classroom in a real-world setting.

II.B.2.c.vii. Describe how the eligible agency will improve outcomes and reduce performance gaps for CTE concentrators, including those who are members of special populations. (Section 122(d)(4)(C) of Perkins V)

RIDE will ensure equal outcomes to approved CTE programs of study and activities assisted under this Act for special populations through:

- The **program approval process** which considers program admission, enrollment and retention policies.
- The **program accountability system** which reports disaggregated data whenever possible to identify participation and/or performance gaps by student population. RIDE will require programs that have consistent participation or performance gaps to conduct a root cause analysis and address the issue to continue to qualify for funding for the program.
- **State-coordinated communication** through a central information and enrollment platform to be developed in FY20 and FY21.

- RIDE will publish **CTE Program Report Cards** annually. These reports require breakouts by student population. These reports will help students and families make choices about the right opportunity for their needs, especially for members of special populations and will help schools to determine gaps and needs for program improvement.

Equity Grants

For programs for which the data shows that students of special populations are not participating or succeeding, RIDE will offer "Equity Grants" – grants with the objective of closing participation or performance gaps. These grants require applicants to analyze program data, determine a root cause for any participation or performance gap by any student subgroup, and propose an actionable, sustainable solution for addressing the identified gap. Applicants must be able to provide lessons learned and/or materials to support other schools in implementing the action if successful. Ultimately, this strategy will create a database of tested strategies for ensuring equity of access, participation, and performance of all student subgroups. RIDE will consult the CTE Board in making its funding decisions and reporting on outcomes.

This grant program will be available to schools through Perkins Reserve Funds. Grants support the development of resources that can be shared with schools around the state in support of closing participation and performance gaps. Eligible recipients (including secondary and postsecondary applications) must first complete a root cause analysis, then develop a research-based approach to addressing the program. Applicants may then submit a proposal to implement the proposed solution. As a requirement of the grants, the recipient must develop a related toolkit for potential future application and/or lessons learned and analysis of information in cases where improvement was not observed.

The outcomes of the Equity Grant program will live in a database available to educators and administrators with the intent of amplifying financial impact of the grant investment, and ultimately creating a library of proven approaches to participation and/or performance gaps.

Additionally, the CTE Program Report Card reports disaggregated data whenever possible to identify participation and/or performance gaps by student population. RIDE may require programs that have consistent participation or performance gaps to conduct a root cause analysis and address the issue to continue to qualify for funding for the program.

II.B.2.d. Describe how the eligible agency, if it chooses to do so, will include the opportunity for secondary school students to participate in dual or concurrent enrollment programs, early college high school, or competency-based education. (Section 122(d)(4)(D) of Perkins V)

RIDE will include the opportunity for secondary school students to participate in dual or concurrent enrollment programs and/or early college high school through:

PrepareRI Dual Enrollment Fund

Rhode Island General Law 16-100-3(a) of 2012 mandated the creation of a statewide dual enrollment policy that increased access to dual, concurrent, and early college programs for all RI public school students. Further, annually since 2015, Rhode Island has included a fund, the PrepareRI Dual Enrollment Fund, to cover the tuition and fees for all students, thereby eliminating previously experienced financial barriers to the program. The fund includes covering tuition and fees for concurrent enrollment courses that have been embedded in CTE programs. Additional funding from Perkins supports the implementation of the CTE-related courses from the Community College of Rhode Island (CCRI).

Transcripted Credit Requirements

The CTE Board Standards for many career fields identify required postsecondary transcripted college credit requirements. Where identified, programs must demonstrate that all students have the opportunity to earn transcripted college credit to be approved as a state CTE program.

P-TECH

As of 2016, RIDE recognizes the Pathways in Technology Early College High School (P-TECH) model as a CTE program. As of the 2019-20 school year, RIDE has five established P-TECH programs in Rhode Island. Students from any district may enroll in these programs to pursue their high school diploma, an associate degree, and first-in-line employment opportunities with each respective industry partner.

Postsecondary Partnership Grants

Eligible postsecondary institutions may apply for Postsecondary Partnership Grants from Rhode Island's Perkins Reserve Fund to better support transcripted, program-aligned college credit earned while in high school CTE programs, and industry-specific teacher professional development.

Updated Secondary School Regulations

As of 2014, Rhode Island adopted a competency-based model of student learning through the Rhode Island Council on Elementary and Secondary Education's Regulations Governing Secondary Learning Environments. Since that time, Rhode Island has supported schools in adopting competency-based approaches through partnerships with the Center for Collaborative Education and the Nellie Mae Foundation, the Rhode Island Foundation and other partners.

II.B.2.e. Describe how the eligible agency will involve parents, academic and career and technical education teachers, administrators, faculty, career guidance and academic counselors, local business (including small businesses), labor organizations, and representatives of Indian Tribes and Tribal organizations, as appropriate, in the planning, development, implementation, and evaluation of its career and technical education programs. (Section 122(d) (12) of Perkins V)

As previously described, RIDE will involve parents, academic and CTE teachers, administrators, faculty, career guidance and academic counselors, local business (including small businesses), labor organizations, and representatives of Indian Tribes and Tribal organizations, as appropriate, in the planning, development, implementation, and evaluation of its CTE programs, through:

- The public publishing of a central enrollment and information system
- The public publishing of CTE Program Report Cards
- Public CTE Board meetings and CTE Board Advisories meetings

Further, since fall 2017, RIDE has hosted a public event, known as the PrepareRI Summit, which serves as an opportunity for sharing opportunities and engaging various stakeholders in state priorities regarding college and career readiness. As part of the PrepareRI initiative, Rhode Island has hired PrepareRI Ambassadors – parents, community leaders, educators, and industry representatives – to take on discrete projects to increase engagement with specific communities, develop toolkits for implementing state initiatives, and provide stakeholder voice in policy and program development. PrepareRI Ambassadors lead sessions at the PrepareRI Summits to gather input and/or share out their projects with the state.

II.B.2.f. Include a copy of the local application template that the eligible agency will require eligible recipients to submit pursuant to section 134(b) of Perkins V.

Perkins V Funding Application

OVERVIEW

CTE career preparation programs, initiatives, and planning activities must include a budget and budget narrative detailing how the CTE program funds will be budgeted to achieve the desired goals as described in the Comprehensive Local Needs Assessment (Needs Assessment). All funding applications must also indicate the milestones that will be used to progress monitor and track progress toward continuous improvement.

This application picks up where the Needs Assessment left off. How funds are budgeted for the 2020-21 program year should reflect year 1 expenditures of the two-year Theory of Action described in Section 6 of the Needs Assessment.

Submit your application no later than 11:59PM June 14th.

INSTRUCTIONS

The funding application is divided into the following sections:

Section 1: Alignment Analysis

Section 2: Budget (Excel File)

Section 3: Budget Narrative

Section 4: Progress Monitoring

SECTION 1: Needs Assessment Alignment Analysis

1. Refer to Section 6, Part 1 and review the 1-sentence summaries provided.

2. Next, for each of the SMART goals identified in Part 2 of Section 6, provide a summary of the way(s) in which funding priorities align to each goal. Limit your responses to 100 words or less.

SMART Goal 1 Alignment

SMART Goal 2 Alignment

SMART Goal 3 Alignment

SMART Goal 4 Alignment

SMART Goal 5 Alignment

SECTION 2: Budget

Provide a full accounting of how you intend to fund your CTE programs to achieve your goals. Include both state categorical and federal Perkins V funding in the budget below.

As a reminder, Effective July 1, 2020, CTE Categorical funding shall be invested into the program that generated the funds. Funds may not be reallocated to different CTE programs within the same school. Each recipient will be required to submit an annual expenditure report detailing how funding was invested. LEAs may request a waiver from some or all of this requirement. Waiver requests must be made to RIDE, which will evaluate the request based on standards set by the CTE Board, and notify the CTE Board of any waivers granted at the CTE Board's next meeting.

CTE Funding Budget Summary (by Object Code/UCOA) – Excel Spreadsheet

	State Categorical	Perkins V Federal Funding	Total Budgeted
51000-Personnel Services-Compensation			

	State Categorical	Perkins V Federal Funding	Total Budgeted
52000-Personnel Services-Employee Benefits			
53000-Purchased Professional & Technical Services			
54000-Purchased Property Services			
55000-Other Purchased Services			
56000-Supplies & Materials			
57000-Property & Equipment			
58000-Miscellaneous			
60000-Indirect Costs			

Need to provide indirect cost rate.

SECTION 3: Budget Narrative

Part 1: Describe how you plan to utilize state categorical and Perkins funds to support key program components. Limit your response for each component to 100 words or less.

1. Meeting CTE Board Standards

2. Work-based learning opportunities (5 areas)

3. Advanced coursework and/or industry credentials

4. Teacher recruitment, training and ongoing professional development

5. Property/Equipment

6. Program Scope

7. Equity, Access & Participation Supports

8. Individualized Learning Plan

Part 2, Budget Rationale: Why is this the most efficient use of funds for the 2020-21 program year? In what ways does the budget support the highest “return on investment” or ROI?

SECTION 4: Progress Monitoring

Describe the desired outcomes as well as the frequency and process by which you will reflect on those outcomes? These may be the SMART goals you created in the Needs Assessment or a “milestone” designed to measure growth towards achieving a goal by the

end of the 2021-22 school year. Consider what data you will routinely analyze as a part of progress monitoring and use the template below to share your plan.

2020-21 Progress Monitoring Plan

Outcome 1:	
Data to Examine:	Frequency:
Outcome 2:	
Data to Examine:	Frequency:
Outcome 3:	
Data to Examine:	Frequency:
Outcome 4:	
Data to Examine:	Frequency:
Outcome 5:	
Data to Examine:	Frequency:

II.B.2.g Include a copy of the local needs assessment template that the eligible agency will require eligible recipients to submit pursuant to section 134(c) of Perkins V.

Comprehensive Local Needs Assessment

OVERVIEW

The Strengthening Career and Technical Education for the 21st Century Act, otherwise known as Perkins V, was signed into law in July 2018. This legislation reauthorized the Carl D. Perkins Career and Technical Education Act of 2006 which governs the federal support for career and technical education (CTE). One of the most significant changes introduced in Perkins V is the new Comprehensive Local Needs Assessment (Needs Assessment).

Specifically, the legislation states, “To be eligible to receive financial assistance under this part, an eligible recipient shall — (A) conduct a comprehensive local needs assessment related to career and technical education and include the results of the needs assessment in the local application submitted under subsection (a); and (B) not less than once every 2 years, update such comprehensive local needs assessment.”

Section 134(c) of Perkins V describes requirements for the Needs Assessment. Secondary and postsecondary eligible recipients shall include the following steps in the process:

1. Organize group of stakeholders

2. Analyze student and labor market data

3. Evaluate current CTE programs

4. Create strategies and actionable activities

Purpose

The purpose of the Needs Assessment is to align planning, spending, and accountability activities under Perkins V to support high-quality CTE programs. As part of the Rhode Island CTE program approval process, applicants must first submit a Needs Assessment to inform the local application. The program approval application due later this spring will build on this work and explain how the program will address the needs identified in the Needs Assessment. Any gap areas identified through the development of the Needs Assessment should directly align to the goals and action steps in the RI Local Application.

Stakeholder Engagement

The Needs Assessment should be developed in partnership with a diverse group of stakeholders. The law specifies that, at a minimum, the following stakeholders should be included:

- CTE program representatives at the secondary and postsecondary levels, including teachers, faculty, administrators, career guidance and advisement professionals, and other staff
- State or local workforce development board representatives
- Representatives from a range of local businesses and industries
- Parents and students
- Representatives of special populations

During school closures due to COVID-19, LEAs are encouraged to leverage virtual meetings and stakeholder conference calls to gather feedback. RIDE acknowledges that these are unusual times. For this reason, LEAs may want to also review notes and insights from previous meetings with local advisories, industry partners and the CTE Board of Trustees. Stakeholder engagement does not have to occur all at once, nor does it have to include every stakeholder in a single meeting.

Data

A strong CLNA is based on data. The RI Report Card site provides Diploma Plus metrics, including a Postsecondary Success Index Score which includes the number of 2018 graduates that earned a CTE credential. Dive deeper and examine program concentrator data in aggregate and by subgroup. Graduation rates, proficiency percentages and program enrollment data are required data points for every Needs Assessment.

Alignment analysis of local programs to CTE Career Field Standards as well as the RIDE CTE Program Standards are all data to consider.

Root Cause Analysis

A needs assessment attempts to identify the underlying factors or “root causes” that explain why a performance gap exists. There are many protocols and frameworks for conducting a root cause analysis, all of which ultimately boil down to asking "why?" until useful responses stop coming or the solution falls outside of District/Center control2. Engage stakeholders through this process or a similar one to examine data and gather feedback.

Needs Assessment Instructions

Rhode Island CTE programs exist to provide all Rhode Island students with skills, experiences, and credentials that will propel their success in life and the workforce.
The Needs Assessment is a tool designed to support LEA’s through a process that will identify the underlying factors within a school or district’s control that explain any gaps in CTE programming, quality and access. Any conclusions from this process will then become critical inputs for the Program Approval Application.

The Needs Assessment is divided into the following sections:

- Student Performance: the extent to which students are currently achieving the necessary skills and indicators of readiness, both in aggregate and by subgroups
- Labor Market Needs: the skills and areas where students will find opportunities for success in the future
- Student Access & Participation: the extent to which all students have access to and are accessing CTE
- Program Scope & Alignment: the ability of current programs to prepare students for success
- Educator Recruitment, Retention & Training: the tools and experiences educators will require in order to prepare students for the opportunities of the future
- Conclusions: a summary of the findings that have surfaced as a result of the analysis and the theory of action that will transform CTE programs in your community.

Complete the Needs Assessment Survey by 11:59 p.m. on June 14, 2020 to share insights and highlights from data dives and stakeholder feedback. Instructions are provided in more detail below.

Please Note:

- Each section includes short answer questions as well as a long answer summary. Complete all questions.

- The survey cannot be saved and continued at a later date. Instead, use this document and supporting links to prepare responses in advance and paste them into the form.
- Additional resources can be found on the CTE landing page, including a Briefing Deck and Frequently Asked Questions (FAQs).

Cover Sheet

Be prepared to provide basic contact information for the District/Institution as well as contact information for the individual completing the form. Two data points are requested:

- List the approved CTE programs that currently operate in the district/institution and also provide for which CTE Board Standard each has been approved.
- What is the current total enrollment for all CTE programs in the district/institution?

Stakeholder Engagement Contact Information

Provide the names and contact information for those individuals who cEontributed to the Needs Assessment. Download and complete the Stakeholder Engagement Tracker in advance and upload it when you complete the survey. Include the District/Center Name in the name of file.

SECTION 1: Student Performance

How well are our students performing? What can we do to increase performance across all subgroups?

Short Answer Questions:

Using the RI Report Card Postsecondary Success Index data and CTE Standards, answer the following questions:

- How many of our CTE concentrators earning industry-recognized credentials, as recognized in the CTE Board Standards? Do you see any patterns in who earns industry-recognized credentials and who does not?
- Are specific subgroups more or less likely to earn industry recognized credentials? What is driving those differences in performances?

Using the local CTE performance data (e.g. concentrator achievement by program, by subgroup, by priority sector, etc.), answer the following questions:

- How are learners from different genders, races and ethnicities performing in our programs? Break this analysis down at the LEA level, program level, and disaggregate by Priority Sector programs and non-Priority Sector programs and share high level insights.
- (Secondary Only) Which CTE concentrators are succeeding in the CTE course sequences' academic coursework (including advanced coursework and dual/concurrent enrollment)? Have specific subgroups been more or less successful?

Analysis Summary (Long Answer): What root causes were uncovered from the prompts above? How do you know? Share data and stakeholder feedback as further evidence to support your analysis.

SECTION 2: Labor Market Alignment

How well are programs aligned with state, regional and local workforce and career needs?

Short Answer Questions:

1. What lessons have we learned from participants of our program about how our program prepares students for the labor market? What patterns do we see with the skills they demonstrate or jobs they end up doing?

Examine Rhode Island Labor Market information and review pages 35-61 of the Rhode Island Commerce Corporation report and answer the following questions:

1. What are the highest projected growth industries in our region? What occupations are part of that industry?
2. How are the CTE programs we offered aligned to the demand? How do we know?

Section 2 Analysis Summary (Long Answer): Provide a summary of lessons learned, patterns of success and areas of concern from the prompts above? Share data and stakeholder feedback as further evidence to support your analysis.

SECTION 3: Student Access & Participation

Do we ensure that all students have access and support to our CTE programs?

Short Answer Questions:

Examine local data to answer the questions below, including:

- Program application (student-level) data,
- Acceptance (student-level) data
- Program Completion (student-level) data
- District Individualized Learning Plan

1. Who is currently entering (or applying to enter) our CTE programs? In your response, consider whether all student subgroups are applying to or entering programs proportionately to the school population.
2. How does participation in some programs compare to other CTE programs we have? What are the differences? Does participation match the demographics of our school?

3. What efforts have been made to recruit and retain diverse populations of learners into our programs, particularly in programs leading to Priority Sector career fields and occupations?
4. What barriers might students requiring extra supports (credit recovery, language acquisition programs, and or developmental core content) face in accessing our programs? What supports do we provide to serve students with special needs?

Secondary-only prompts:

1. If we accept students from out of district, are some student subgroups more or less represented in who applies or attends?
2. Are students utilizing their Individual Learning Plans and school counseling to determine a program? What evidence do we have?
3. Are middle school career exploration programs supporting all or some of our programs?

Section 3 Analysis Summary (Long Answer): What potential root causes were uncovered from the prompts above? How do you know? Share data and stakeholder feedback as further evidence to support your analysis.

SECTION 4: Program Scope & Alignment

Are our current programs able to meet the needs of students to enter high wage, high demand career opportunities? For detailed information about secondary funding eligibility, see Section II.C.1 of the Perkins V State Plan.

Short Answer Questions:

Using CTE Board Standards, answer the following questions:

1. Are our programs meeting the full requirements of the CTE Board Standards for which they were approved? How could we better meet or exceed the standards included in that document?
1. How do course offerings in each program build upon each other, from basic knowledge and skills to more complex knowledge and skills?

Using the Governor's Workforce Board Work-based Learning Activities and Standards Guidelines, answer the following questions:

1. What work-based learning experiences (industry projects, service learning, internships, apprenticeships and/or school-based enterprises) are available within our programs?
1. Are learning experiences of sufficient scope to meet the needs of all students? How do we know?

Section 4 Analysis Summary (Long Answer): Provide a summary of lessons learned, patterns of success and areas of concern. Share data and stakeholder feedback as further evidence to support your analysis.

SECTION 5: Educator Recruitment, Retention & Training

How can we improve recruitment, retention, and training of CTE teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in such professions?

Short Answer Questions:

Using CTE teacher certification requirements, the RIDE eCert portal, and local data sources (i.e. teacher Professional Learning Units, surveys, professional development calendar, etc.), answer the following questions:

1. Do we have adequate staff credentialed to teach our CTE programs? How do we know? What gaps exist, if any, and what is our plan to minimize them?
2. What processes are in place to recruit, induct and retain faculty and staff? Are these processes efficient and effective, especially for instructors coming from industry? How recently have teachers had program-related work experience?
3. What steps are we taking to ensure our staff/faculty reflect the demographic makeup of our student body?
4. How often do we offer regular, substantive professional development opportunities for faculty, staff and administrators, including involvement in student advising? How effective are these experiences at improving student outcomes? What evidence do we have?
5. Are there patterns of higher CTE concentrator achievement in programs that have educators with specific education type, certification types, and specific types/lengths of experience or professional development opportunities?

Section 5 Analysis Summary (Long Answer): What potential root causes were uncovered from the prompts above? How do you know? Share data and stakeholder feedback as further evidence to support your analysis.

SECTION 6: Conclusions

Now that you have thoroughly examined the data and discussed the underlying factors that explain any gaps in current programs (and highlights the strengths as well), create a one page summary to guide your strategy moving forward. Organize the one-pager into two parts.

Part 1: Needs Assessment Findings

Provide a 1-sentence summary of your findings for each section of your needs assessment.

- Based on your observations of the data and determination of root causes of those observations from each component, what conclusions are you drawing about the needs of your current program? Which programs are the strongest? Which need to be transformed or retired? What feedback and/or data provided the most "food for thought"?

Part 2: Theory of Action

Create a drawing or outline to summarize what will happen next to transform CTE in your community. Provide 1) an aspirational vision for CTE in your community; 3-5 key levers or strategies that you will enact to realize that vision; and the 3-5 SMART goals you are aiming for to ultimately transform CTE in your community.

Think about the theory of action as an "if-then" scenario. The "ifs" are the 3-5 key levers or strategies while the "thens" are the 3-5 corresponding goals you are you are aiming to achieve.

As a reminder, SMART goals are Specific, Measurable, Achievable, Relevant and Time bound.

Use the following template to organize the one-pager:

Summary	
Section 1. Student Performance:	
Section 2. Labor Market Alignment:	
Section 3. Student Access & Participation:	
Section 4. Program Scope & Alignment:	
Section 5. Teacher Recruitment, Retention & Training:	
Vision:	
Strategies	Goal
1.	1.
2.	2.
3.	3.
4.	4.
5.	5.

II.B.2.h Provide the definition for "size, scope, and quality" that the eligible agency will use to make funds available to eligible recipients pursuant to section 135(B) of Perkins V.

Size, Scope, & Quality: Secondary

Perkins funds may only be spent on CTE programs that have been state-approved or have received preapproval. Preapproved programs will have 18 months to receive full state approval.

In order to be considered for state approval, all secondary CTE programs must include all of the following:

- Include at least three non-duplicative courses that meet CTE Board Standards
- Meet RIDE's CTE Regulations from 2012
- Meet CTE Board Standards, culminating in students earning CTE Board-recognized credentials or credit
- Include work-based learning experience for every student aligned to Governor's Workforce Board (GWB) guidance and, as applicable, any CTE Board work-based learning standards
- Evidence that all CTE teachers have proper certification
- Evidence that students are provided opportunities to demonstrate employability skills

Additionally, LEAs must have:

- At least one state-approved program in a Priority Sector; or be developing such a program, receive pre-approval from RIDE and the CTE Board, and submit it for approval within 18 months of first fund use.
- Non-discriminatory admissions policies

For more detailed information about secondary funding eligibility, see Section II.C.1 on page 54.

Size, Scope, & Quality: Postsecondary

The only postsecondary institution receiving local formula funds in Rhode Island is the Community College of Rhode Island (CCRI). Other postsecondary institutions in Rhode Island, including both public and private institutions, may receive Perkins funds through the Reserve Fund, via competitive Postsecondary Partnership Grants.

All courses for secondary school students paid for by Perkins dollars must offer students *transcripted* academic credit that is transferrable to other universities. Courses that offer *articulated* credit (that is, credit which is only accepted at the issuing postsecondary institution) are not eligible for Perkins funds.

Postsecondary Programs for K-12 Students

Funded programs may offer courses via dual enrollment or concurrent enrollment. Dual enrollment courses are courses offered at the postsecondary institution. Concurrent enrollment courses are courses offered at the high school by an instructor approved by the postsecondary institution. To be eligible for Perkins funds, concurrent enrollment courses must meet the same standards of quality and rigor as dual enrollment courses. Funded programs may be asked to present to the CTE Board.

Postsecondary Programs for Postsecondary Students

College-level programming must lead to students earning industry-recognized credentials of value. Programs must embed work-based learning opportunities and employability skills training aligned to relevant state standards. Programs must engage students in some form of career counseling. Funded programs may be asked to present to the CTE Board.

For more detailed information about postsecondary funding eligibility, see Section II.C.1 on page 56.

II.B.3. Meeting the Needs of Special Populations

II.B.3.a. Describe the eligible agency's program strategies for special populations, including a description of how individuals who are members of special populations—

1. ***will be provided with equal access to activities assisted under this Act;***
1. ***will not be discriminated against on the basis of status as a member of a special population;***
1. ***will be provided with programs designed to enable individuals who are members of special populations to meet or exceed State determined levels of performance described in section 113, and prepare special populations for further learning and for high-skill, high-wage, or in-demand industry sectors or occupations;***
1. ***will be provided with appropriate accommodations; and***
1. ***will be provided instruction and work-based learning opportunities in integrated settings that support competitive, integrated employment. (Section 122(d)(9) of Perkins V)***

RIDE has long fought to ensure students with disabilities receive the support they need to meet high expectations, and exit the public education system as productive citizens, lifelong learners, and contributing members of the workforce. RIDE strives to ensure that individuals with diverse learning needs and children receiving special education services are provided access to a rigorous public education—including, but not limited to, CTE programs—and that schools develop effective strategies for meeting the needs of these unique learners.

RIDE is responsible for advancing the education of:

- Children and youth with disabilities who require special education.

- Children and youth who are English Language Learners (ELL), Multi-Lingual Learners (MLL), or Limited English Proficient/Non-English Speaking (LEP).
- Children and youth who are disadvantaged and/or participate in Title I, who are experiencing homelessness, and/or who are neglected, delinquent, or at-risk.
- Children and youth who are gifted or Learning Beyond Grade Level.
- Children and youth who learn through Expanded Learning Opportunities (ELOs). This includes after-school or summer programs, which support learning opportunities for students outside of the regular school day or school year.
- Children and youth whose health and safety are advanced through nurturing school environments.

RIDE is currently working on a Multi-Tiered System of Support (MTSS), which is a framework for ensuring all students receive the support they need to be successful. This framework ensures that all students are supported for meeting academic, behavioral, and social-emotional outcomes. CTE is for all students, and that means all students—including multilingual learners, differently-abled students, and any student who needs more support to be successful. RIDE believes any student can be successful, if given the proper supports.

In a Multi-Tiered System of Support, all students have equitable access to strong, effective core instruction using high-quality curriculum and differentiated instructional practices at Tier 1, evidence-based group interventions at Tier 2, and intensive, evidence-based interventions at Tier 3. (See diagram below.) By providing these supports in schools and communities where children and youth in special populations reside and visit, Rhode Island's education system is setting students up for success.

Multi-Tiered System of Support (MTSS)

RIDE aims to be a champion for educational equity, and has committed to lead the way in addressing inequities of the past by focusing on providing learning opportunities for all students. RIDE will maintain a relentless focus on student outcomes that ensures stakeholders deliver on the promise of equity for all students. RIDE will strive to ensure individuals of special populations are able to access CTE programs, including programs in Priority Sectors. All students should be able to earn credentials and complete work-based learning experiences that prepare them for further learning and for competitive, integrated employment. RIDE will achieve this vision for inclusive CTE through the following mechanisms:

- In applications for the creation or renewal of CTE programs, programs must provide evidence that they provide adequate supports, staffing, and/or resources for students with Individualized Education Plans (IEPs).
- Through yearly reporting and applications for new/renewed programs, LEAs must demonstrate that any program utilizing Perkins funding maintains inclusive,

nondiscriminatory admission, enrollment, and retention policies. This includes both in-district and out-of-district student enrollment.

- RIDE will increase communication and access to program opportunities through a statewide unified enrollment and information system for students. RIDE will begin rolling out this system in FY21.
- In the annual reports required of all programs receiving Perkins formula funds, programs must report disaggregated student outcome data. RIDE and the CTE Board may ask programs with participation or performances gaps to conduct a needs analysis and action plan.
- RIDE will provide technical assistance to support schools in analyzing disaggregated program data, and implementing evidence-backed strategies for supporting student from special populations.
- RIDE will provide professional development to help special educators, counselors, teachers, and other school personnel work with students to align IEPs with Individual Learning Plans (ILPs) that provide students with a roadmap for how to develop the academic, career, social-emotional, and employability skills they need for postsecondary success.
- RIDE will ensure CTE programs meet federal Office of Civil Rights (OCR) requirements through regular reviews, as overseen by OCR.

Schools should provide access to CTE programs to members of special populations in accordance with their interests and career goals —not based on their status as members of a special population. Perkins fund recipients are encouraged to work together to assess performance data for all students across all special populations, to identify performance gaps and trends, and subsequently select strategies to address any inequalities in student performance.

RIDE intends to use the annual Equity Grants program, funded through Perkins Reserve Funds, to encourage schools to develop innovative supports for students from special populations. During and after the term of their Equity Grant, recipients will work with RIDE to provide professional development to other schools that are struggling with similar equity gaps. This process will help develop a community of practice that works together to spread best practices for serving students with diverse needs. The Equity Grants should thus help Rhode Island develop reality-tested resources for how to serve all students in CTE programs, and help create a culture among Rhode Island's CTE programs that prioritizes equity.

II.B.4. Preparing Teachers and Faculty

II.B.4.a. Describe how the eligible agency will support the recruitment and preparation of teachers, including special education teachers, faculty, school principals, administrators, specialized instructional support personnel, and paraprofessionals to provide career and technical education instruction, leadership, and support, including professional development that provides the knowledge and skills needed to work with and improve instruction for special populations. (Section 122(d)(6) of Perkins V)

CTE Teacher Pipeline

RIDE will support the recruitment and preparation of teachers, including special education teachers, faculty, school principals, administrators, specialized instructional support personnel, and paraprofessionals, to provide world-class CTE instruction in Rhode Island. RIDE is adopting a few strategies, outlined below, to build the teaching corps that Rhode Island's CTE students deserve.

CTE Teacher Certification

RIDE has been working to make it easier for schools to hire qualified professionals to teach CTE in Rhode Island. In December 2019, the Council on Elementary and Secondary education passed revisions to the teacher certification regulations to better align RIDE's requirements with industry requirements. Previously, all CTE teachers were required to hold a bachelor's degree to become a certified teacher, regardless of their level of expertise in their career field or the standard degree expectation for that field. This policy had the unintended effect of keeping many qualified mid-career professionals from teaching CTE programs.

The revised regulations provide more flexibility around the degree requirements for CTE teachers. CTE teachers must have whatever level degree is typical for the career field they teach. For example, CTE programs in many trade professions do not require a bachelor's degree, but computer science programs do require one. To determine the degree requirements expected by industry, RIDE adopted the recommendations of industry and education professionals in each of the career field Advisories of the state CTE Board.

CTE Teacher Grant

RIDE will leverage part of the secondary Perkins Reserve Fund for CTE Teacher Grants, which support the certification and training of CTE teachers. For more information, see section II.C.2.a on page 62.

CTE Teacher Certification at Roger Williams University

A key component of developing a robust CTE teacher pipeline is making CTE teacher certification programs easily accessible to potential teachers. Unfortunately, until a few years ago, Rhode Island did not have any approved CTE teacher certification programs in the entire state. To address that issue, RIDE released a request for proposal (RFP) to launch an in-state CTE teacher certification program. This led to the creation of the CTE Teacher Certification program at Roger Williams University, a private college in Rhode Island. The

program is located at Roger Williams's University College and provides a competency-based education designed with working adults in mind. Assignments are designed to be practical, job-embedded, and closely connected to classroom learning. Micro-courses are held each month with additional learning experiences, resources, and assignments available at all times. The program launched in fall 2019.

Teacher Endorsements

Under the revised teacher certification regulations passed in 2019, RIDE created the opportunity for teachers to earn micro-credentials, called "endorsements," to demonstrate expertise in a particular subject area. In 2020, the Council on Elementary and Secondary Education approved a Computer Science Endorsement. This endorsement was created to encourage and recognize teachers who have demonstrated expertise in computer science, one of the CTE Priority Sectors RIDE is hoping to expand. RIDE will evaluate the impact of the Computer Science Endorsement on the state's computer science teaching corps, to determine if such a similar approach should be adopted for other CTE career fields.

Professional Learning

While Rhode Island needs a strong pipeline to get qualified CTE teachers in front of students, these teachers also need ongoing learning and professional development to be effective. RIDE understands that both teachers and students should engage in a process of continuous learning and improvement.

PrepareRI Summits

Starting in fall 2017, RIDE and the PrepareRI partner agencies began hosting PrepareRI Summits, a statewide conference for leaders from schools, industries, and colleges. At the Summits, these cross-sector stakeholders meet each other and learn about state and local efforts to build career pathways for Rhode Island's young people.

Career Coordinators Network

In 2018, RIDE asked every high school in Rhode Island to designate a "Career Coordinator," a staff member who serves as the point person for employer partnerships and coordinates work-based learning. As of January 2020, nearly 90% of Rhode Island's high schools had designated a Career Coordinator and submitted that person's contact information to RIDE. Beginning in the 2018-19 school year, RIDE began convening a monthly statewide professional development session for Career Coordinators, dubbed the Career Coordinator Network. This forum allows RIDE to share information related to career pathways work with personnel at nearly every high school in the state and creates a professional learning community focused on sharing best practices.

Professional Learning Communities for Individual Learning Plans

Starting in the 2019-20 school year, RIDE began hosting a Professional Learning Community (PLC) for school counselors. The focus of these PLCs is helping school counselors work with students to develop Individual Learning Plans (ILPs) that help students plan how to navigate their K-12 experience to prepare for a career aligned to their passions.

c. Fiscal Responsibility

- 1. Describe the criteria and process for how the eligible agency will approve eligible recipients for funds under this Act, including how—
    - a. Each eligible recipient will promote academic achievement;
    - b. Each eligible recipient will promote skill attainment, including skill attainment that leads to a recognized postsecondary credential; and
    - c. Each eligible recipient will ensure the local needs assessment under section 134 takes into consideration local economic and education needs, including, where appropriate, in-demand industry sectors and occupations. (Section 122(d)(5) of Perkins V)
- 2. Describe how funds received by the eligible agency through the allotment made under section 111 of the Act will be distributed—
    - a. Among career and technical education at the secondary level, or career and technical education at the postsecondary and adult level, or both, including how such distribution will most effectively provide students with the skills needed to succeed in the workplace; and
    - b. Among any consortia that may be formed among secondary schools and eligible institutions, and how funds will be distributed among the members of the consortia, including the rationale for such distribution and how it will most effectively provide students with the skills needed to succeed in the workplace. (Section 122(d)(8) of Perkins V)
- 3. For the upcoming program year, provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 131(a)-(e) of the Act and describe how these allocations are distributed to local educational agencies, areas career and technical education schools and educational service agencies within the State. (Section 131(g) of Perkins V)
- 4. For the upcoming program year, provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 132(a) of the Act and describe how these allocations are distributed to eligible institutions and consortia of eligible institutions within the State.
- 5. Describe how the eligible agency will adjust the data used to make the allocations to reflect any changes in school district boundaries that may have occurred since the population and/or enrollment data was collected, and include local education agencies without geographical boundaries, such as charter schools and secondary schools funded by the Bureau of Indian Education. (Section 131(a)(3) of Perkins V)

- 6. If the eligible agency will submit an application for a waiver to the secondary allocation formula described in section 131(a)—
    - a. Include a proposal for such an alternative formula; and
    - b. Describe how the waiver demonstrates that a proposed alternative formula more effectively targets funds on the basis of poverty (as defined by the Office of Management and Budget and revised annually in accordance with section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2)) to local educational agencies with the State. (Section 131(b) of Perkins V)

Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

- 7. If the eligible agency will submit an application for a waiver to the postsecondary allocation formula described in section 132(a)—
    - a. Include a proposal for such an alternative formula; and
    - b. Describe how the formula does not result in a distribution of funds to the eligible institutions or consortia with the State that have the highest numbers of economically disadvantaged individuals and that an alternative formula will result in such a distribution. (Section 132(b) of Perkins V)

Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

- 8. Provide the State's fiscal effort per student, or aggregate expenditures for the State, that will establish the baseline for the Secretary's annual determination on whether the State has maintained its fiscal effort, and indicate whether the baseline is a continuing level or new level. If the baseline is new, please provide the fiscal effort per student, or aggregate expenditures for the State, for the preceding fiscal year. (Section 211(b)(1)(D) of Perkins V)

II.C. Fiscal Responsibility

II.C.1. Describe the criteria and process for how the eligible agency will approve eligible recipients for funds under this Act, including how—

a) each eligible recipient will promote academic achievement;

b) each eligible recipient will promote skill attainment, including skill attainment that leads to a recognized postsecondary credential;

Eligibility Criteria: Secondary Schools

State Approval

Perkins funds may only be spent on CTE programs that have been state-approved. Funds may be spent to seed new programs if the program has received pre-approval from RIDE

and the CTE Board; such programs must be submitted for state approval within 18 months of first fund use.

All CTE programs must meet RIDE requirements for "size, scope, and quality" (see Section II.B.2.h on page 46 above. Specifically, programs must:

- Include at least three non-duplicative courses and meet RIDE's CTE Regulations from 2012
- Align to CTE Board program standards, culminating in students earning CTE Board-recognized credentials or credit
- Include work-based learning experience for every student aligned to Governor's Workforce Board (GWB) guidance and any CTE Board work-based learning standards
- Teach employability skills

The state approval process is designed to ensure that all CTE programs in the state provide students with skills that are actually valued by Rhode Island employers. The CTE Board Standards, which are developed by Industry Advisories consisting of representatives from both education and industry, set standards that include recognized postsecondary or industry credentials, as well as requirements regarding academic course sequences.

Priority Sectors

To be eligible for Perkins funds, LEAs must have at least one state-approved program in a Priority Sector, as defined in Rhode Island's Long-Term Economic Development Plan and adopted by RIDE. If the LEA does not yet have a state-approved Priority Sector program, LEAs may receive Perkins funds if they receive pre-approval from RIDE and the CTE Board for a Priority Sector program; such programs must be submitted for full state approval within 18 months of first fund use.

The Perkins funds that LEAs receive do not need to be solely spent on the LEA's Priority Sector programs; they may be spent on any state-approved CTE program within the LEA. By contrast, *state* CTE Categorical funds may only be used for CTE programs in Priority Sectors.

Admissions

Rhode Island's CTE Regulations from 2012 allow students to enroll in any CTE program in the state, including those at high schools outside the LEA of their residence. To be eligible for Perkins funds, LEAs cannot have discriminatory admissions processes for their CTE programs. This includes restricting access based on race, gender, disability status (IEP), language, and/or income status.

Programs must report admissions requirements to RIDE and the number of students admitted/rejected from different student populations annually. RIDE and the CTE Board reserve the right to identify programs with admissions policies that have a disproportionate impact on student subpopulations, and will work with schools to develop admissions requirements that ensure all student groups are equitably served by CTE programs.

Use of Funds

RIDE and the CTE Board will issue use-of-funds guidance to support an effective use of Perkins formula funding. It will outline effective strategies for increasing the career readiness of youth.

Middle schools. Recipients will be eligible to use up to 10% of their Perkins allocation for career exploration activities and programs in grades 5 to 8. The primary objective of these allocations should be career exploration programming that helps middle school students identify which career fields and CTE programs interest them.

Non-instructional expenses. RIDE reserves the right to set a cap on the allowable percentage of Perkins funds spent on non-instructional expenses.

Funding Application

Rhode Island will release an annual application for Perkins funding. This application may include a narrative application, required evidence, and budget. The application's focus will be how the program will use the funds to meet the CTE Board Standards and prepare students for career success. RIDE and the CTE Board are focused on maximizing the return on investment (ROI) of Perkins dollars on student outcomes.

RIDE and the CTE Board shall create a process for review of eligible recipients to present their annual funding application, proposed budget, and needs assessment to the CTE Board and RIDE. All programs may be required to follow this process; the CTE Board and RIDE will jointly decide which programs must follow this presentation process in a given year.

If programs need to modify their approved budgets, they must notify RIDE and the CTE Board. Major modifications require prior approval from RIDE.

Annual Reporting

All LEAs are required to submit data and a year-end report to RIDE every year. This data submission will be used for RIDE's school-level Report Cards under ESSA, as well as for program-level CTE Program Report Cards.

If these annual reports indicate the program is not meeting expectations for student outcomes, RIDE and the CTE Board reserve the right to work with CTE programs to improve those outcomes.

Programs are required to report any changes to their program related to their ability to meet RIDE and CTE Board Standards. For example, if programs change the course sequence within the term of their approval, they must notify RIDE and CTE Board. If the new course sequence does not meet CTE Board Standard for which they were originally approved, they may lose their RIDE approval.

Eligibility Criteria: Postsecondary Institutions

The only postsecondary institution receiving local formula funds in Rhode Island is the Community College of Rhode Island (CCRI). Other postsecondary institutions in Rhode

Island, including both public and private institutions, may receive Perkins funds through the Reserve Fund, via competitive Postsecondary Partnership Grants.

Postsecondary Programs Serving Secondary Students

All courses for secondary school students paid for by Perkins dollars must offer students *transcripted* academic credit that is transferrable to other universities. Courses that offer *articulated* credit (that is, credit which is only accepted at the issuing postsecondary institution) are not eligible for Perkins funds. This policy ensures that high school students receive college credits that provide value, regardless of which postsecondary institution students' end up attending.

A portion of funding each year must be dedicated to ensuring coordinated communication strategies for helping schools, students, and families learn about postsecondary CTE opportunities. RIDE encourages postsecondary programs to dedicate a portion of funding each year to aligning academic content requirements between state-approved high school CTE programs and corresponding postsecondary programs, particularly those in Priority Sectors.

Funded programs may offer courses via dual enrollment or concurrent enrollment. Dual enrollment courses are courses offered at the postsecondary institution. Concurrent enrollment courses are courses offered at the high school by an instructor approved by the postsecondary institution.

To be eligible for Perkins funds, concurrent enrollment courses must meet the same standards of quality and rigor as dual enrollment courses. Specifically, concurrent enrollment courses must offer:

- The same college course (delivery, assessment, and content) for high school students as offered on the college campus.
- College-provided teacher mentorship/ professional development for course.
- College-led course quality reviews

Postsecondary Programs Serving Postsecondary Students

College-level programming must lead to students earning industry-recognized credentials of value. Representatives from the PrepareRI agencies—including the Rhode Island Governor's Office, RIDE, Department of Labor and Training (DLT), Governor's Workforce Board (GWB), Office of the Postsecondary Commissioner (OPC), Rhode Island Commerce, and the CTE Board are working to more precisely define industry-recognized "credentials of value" for postsecondary students.

- Programs must offer *transcripted*, not *articulated*, credit to students. (See the previous section for a discussion of articulated versus transcripted credit.)

- Programs must embed work-based learning opportunities and employability skills training, aligned to relevant state standards.
- Programs must engage students in some form of career counseling.

Applications and Reporting for Formula Funds

CCRI is the only postsecondary institution in Rhode Island that will receive formula funds. RIDE will release an annual application for Perkins funding for these funds. This application may include a narrative application, required evidence, and budget. The focus of the application is how the postsecondary institution is using the funds to prepare students for career success. RIDE and the CTE Board are focused on how to maximize the return on investment (ROI) of Perkins dollars on student outcomes. If the postsecondary institution needs to modify the budget that received RIDE approval in the original funding application, it must notify RIDE and the CTE Board. Major modifications require prior approval from RIDE.

The postsecondary institution will be required to submit data and a year-end report to RIDE and the CTE Board every year. If these annual reports indicate the program is not meeting expectations for student outcomes, RIDE and the CTE Board reserve the right to work with the postsecondary institution to improve those outcomes. Student outcomes are tied to transcripted postsecondary credit, industry recognized credential(s), work-based learning opportunity, employability skills, and a demonstrated connection to secondary CTE programs. This may include modifying the terms of approval from the original funding application.

Postsecondary Partnership Grants

Postsecondary Partnership Grants are competitive grants that may be offered to any postsecondary institution in Rhode Island. These grants are offered through the Reserve Fund, and awards are granted based on evidence of providing students with valuable postsecondary/industry credentials, academic skills, and industry-specific teacher professional development. See page 60 for more information.

II.C.1.c. Describe the criteria and process for how the eligible agency will approve eligible recipients for funds under this Act, including how each eligible recipient will ensure the local needs assessment under section 134 takes into consideration local economic and education needs, including, where appropriate, in-demand industry sectors and occupations. (Section 122(d)(5) of Perkins V)

Structure of the Comprehensive Local Needs Assessment

All recipients must demonstrate strong local industry, student interest, and community support to be eligible for Perkins funds. The Comprehensive Local Needs Assessment is the mechanism programs will use to demonstrate this demand.

Program application will require recipients to complete a Comprehensive Local Needs Assessment using a state provided template which requires the eligible recipient to consider local economic and education needs, including, where appropriate, Priority Sectors, as defined by Rhode Island Commerce (see Section II.B.2.c.iii on page 38 for more information) and applied to the CTE Board Standards by the CTE Board and RIDE. Grants will not be distributed to applicants who do not demonstrate completion of the Comprehensive Local Needs Assessment with fidelity.

The Comprehensive Local Needs Assessment asks specific questions around the size, scope and quality of each program. The tool considers:

- **Labor Market Information:** the skills and areas where students will identify career opportunities that allow for career progression and life success in growth industries
- **Program Quality:** the alignment and ability of programs to deliver, support, and meet the academic, technical, and employability skills necessary for students to enter the world of work and be successful in future careers in growing fields
- **Educator Certification and Professional Development:** Support the development of a pipeline of individuals able to meet the requirements of CTE Programs and address related instructor certification requirements. Further, develop the tools and related experiences educators require to prepare students for those opportunities
- **Student Access to Programs:** ensuring all students have access to quality programs that will prepare them for these opportunities
- **Student Performance:** whether students in the program are achieving the necessary skills and indicators of readiness for those opportunities

Timing and Frequency of Local Needs Assessments

During the FY20 planning year, all Perkins recipients will be required to fill out a Comprehensive Local Needs Assessment explaining how all of their CTE programs provide students with the skills they need to succeed in the Rhode Island economy. If student performance data indicates that programs are not meeting the agreed upon expectations of the CTE Program Standards, then RIDE may request that the Comprehensive Local Needs Assessment be updated annually.

Secondary

After the FY20 planning year, LEAs must complete an updated Comprehensive Local Needs Assessment on a biannual basis. The Comprehensive Local Needs Assessment will be a required part of the renewal process for CTE programs. Programs may receive up to a five-year approval. RIDE reserves the right to request additional information, as determined by student performance data and CTE program outcomes. Comprehensive Local Needs Assessments will be included as part of the application process for the approval of new CTE programs.

Postsecondary

Postsecondary institutions receiving formula grants must complete a Comprehensive Local Needs Assessment in FY20, and biannually thereafter. Under this plan, CCRI is the only Rhode Island postsecondary institution receiving formula grants.

Postsecondary institutions receiving competitive Postsecondary Partnership Grants through Perkins Reserve Funds shall be required to complete a Comprehensive Local Needs Assessment as part of the original grant application and any subsequent renewals of the grant.

II.C.2.a. Describe how funds received by the eligible agency through the allotment made under section 111 of the Act will be distributed among career and technical education at the secondary level, or career and technical education at the postsecondary and adult level, or both, including how such distribution will most effectively provide students with the skills needed to succeed in the workplace.

RIDE will allocate 5% of Perkins funds for State Administration, 10% for State Leadership, and 85% for Local Formula Distribution.

Increasing Reserve Fund to 15%

Of the 85% to be distributed through Local Formula Distribution, RIDE will increase the percentage allocated to the Reserve Fund from 10% in FY21 to 15% in FY23. The Reserve will be 10% in FY21, 12.5% in FY22, and 15% in FY23 onwards.

The Reserve Fund will be allocated as follows: 75% for secondary programs and 25% for postsecondary programs. The secondary Reserve Funds will be used for Equity Grants, Career Exploration Grants, and CTE Teacher Grants. The postsecondary Reserve Funds will be used for Postsecondary Partnership Grants. RIDE will award all these Reserve Fund grants on a competitive basis, and all grantees will be required to report on outcomes to RIDE. For the Career Exploration, Equity, and Postsecondary Partnership Grants, grantees must report on *student* outcomes and fulfillment of grant requirements. For the Teacher Grants, grantees must report on *teacher* outcomes and fulfillment of grant requirements. These grant programs replace the previous use of Reserve Funds grants, namely the Vocational Training for Adults (VTA) and Secondary to Postsecondary Articulation for Technology Education (SPATE) programs.

Equity Grants

LEAs may apply for these funds to address access, participation, or performance gaps of specific student subgroups in CTE programs in Priority Sectors. Eligible subgroups include, but are not limited to, special populations and groups such as those defined by: gender, race, socioeconomic status, English Language Learner status, disability status, and others. To be eligible, applicants must identify the gap, complete a root cause analysis, and propose programmatic and/or policy solutions to address the identified root cause. They are funded through the 75% of the Reserve Fund allocated to secondary programs. These funds may be

used for approved programs, or for new programs that have not yet been approval; if used for new programs, the grantee must apply for program preapproval.

Career Exploration Grants

LEAs may apply for these funds to help middle school students explore and build awareness of possible careers—particularly those in Priority Sectors—and high school CTE programs where they could continue pursuing this career progression. All applicants must have an industry partner, connect programming to students' Individual Learning Plan (ILP), and integrate career exploration curriculum into core content classes and report student outcomes. They are funded through the 75% of the Reserve Fund allocated to secondary schools.

CTE Teacher Grants

LEAs may apply for these funds to pay for the costs associated with providing professional development for CTE teachers and for reimbursing teachers for the cost of certification to teach in CTE programs. These grants are funded through the 75% of the Reserve Fund allocated to secondary schools.

Postsecondary Partnership Grants

Postsecondary institutions in Rhode Island may apply for these funds to support programs that allow high school students to earn transcripted, portable credits that prepare students for careers, and provide teachers industry-specific professional development. They are funded through the 25% of the Reserve Fund allocated to postsecondary programs.

Career and Technical Student Organizations (CTSOs)

Career and Technical Student Organizations (CTSOs) are currently funded through 15% of State Leadership Funds. RIDE will maintain current funding levels within State Leadership funds for a CTSO Allocation.

CTSOs are effective at improving the career readiness of students, and RIDE believes they are particularly impactful when directly managed by schools and aligned to their programs. Therefore, RIDE will provide the CTSO Allocation directly to LEAs for their decision-making, rather than having RIDE manage the relationships. These funds will be distributed to LEAs using the same formula used for the Local Formula Distribution. The use of these funds will follow the same rules as Local Formula Distribution dollars. (See page 60 for more information on those rules.) LEAs may decide to spend as much or as little of their CTSO Allocation and their formula allocation on CTSOs as they think will maximally benefit their students.

Leadership and Administrative Funds

RIDE will use Leadership and Administrative funds for funding of technical assistance, support of incarcerated youth and adults in earning industry recognized credentials and skills, and increasing access and participation in CTE programs, specifically among special

populations (as defined by United States Department of Education), and staffing and administrative costs at RIDE.

II.C.2.b. Describe how funds received by the eligible agency through the allotment made under section 111 of the Act will be distributed among any consortia that may be formed among secondary schools and eligible institutions, and how funds will be distributed among the members of the consortia, including the rationale for such distribution and how it will most effectively provide students with the skills needed to succeed in the workplace. (Section 122(d)(8) of Perkins V)

Previously, RIDE required LEAs to join regional consortia, and RIDE distributed all Perkins funds to the fiscal agent of the regional consortia. RIDE is ending that policy under Perkins V. Starting in FY21, LEAs may decide, at their discretion, to join consortia or to receive funds from RIDE directly. RIDE believes schools and district are best able to make these decisions, and therefore RIDE will empower LEAs to make their own decisions about how to receive their Perkins funding.

In order to submit an application for Perkins fund for FY21 onwards, LEAs must submit notice to RIDE about whether they would like to receive the funds generated by their LEA directly, or whether they should be allocated to another fiscal agent as part of a consortium. LEAs may form consortia of any type allowed under federal and state law, regional or otherwise.

Any funds distributed through a consortium will be in accordance with the terms of the consortia's agreed upon practices and procedures that best support the consortium's purpose for serving students. Consortiums must demonstrate all members have considered how to most effectively provide students with the skills needed to succeed in the workplace, and that the proposed distribution model is in service to that goal. RIDE may develop common business rules for all consortia to ensure transparency around funding decisions for LEAs.

The formula for distributing grants among LEAs will not change for FY21 onwards. These grants will follow the methodology used by the United States Department of Education for district level allocations. These are determined based on US Census data with 30% of funding based on overall population and 70% of funding based on poverty in the population. Census data adjusted to account for schools without a corresponding geographic region, using the same method RIDE follows for the distribution of other federal funds, such as Title I.

II.C.3. Provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 131(a)-(e) of the Act and describe how these allocations are distributed to local educational agencies, areas career and technical education schools and educational service agencies within the State. (Section 131(g) of Perkins V)

Based on the FY20 federal allocation, RIDE expects to allocate $4,301,174 for secondary programs using Census data in accordance with the formula in Section 131(a). As noted above, RIDE may distribute these funds directly to LEAs or to consortia, depending on the LEA's stated preference.

II.C.4. Provide the specific dollar allocations made available by the eligible agency for career and technical education programs and programs of study under section 132(a) of the Act and describe how these allocations are distributed to eligible institutions and consortia of eligible institutions within the State.

Based on FY20 federal allocation, RIDE expects to allocate $477,908 for postsecondary programs. The entire amount will be distributed to the Community College of Rhode Island, as it is the only institution that meets the criteria of being public and offering a two-year technical program of study.

II.C.5. Describe how the eligible agency will adjust the data used to make the allocations to reflect any changes in school district boundaries that may have occurred since the population and/or enrollment data was collected, and include local education agencies without geographical boundaries, such as charter schools and secondary schools funded by the Bureau of Indian Education. (Section 131(a)(3) of Perkins V)

Because the Census data used for allocating funds is based on municipalities and does not include charter schools or state schools, RIDE adjusts the data to shift students from their district of residence to the appropriate charter or state school based on the most recent enrollment figures available. For a poverty measure, RIDE assumes that the number of students at the charter or state school in poverty reflect the same proportion as the district they came from. This method is the same one that is also used for other Rhode Island education funding based on poverty (for example, Title I).

There are no charter schools or schools funded by the Bureau of Indian Affairs in Rhode Island.

II.C.6.If the eligible agency will submit an application for a waiver to the secondary allocation formula described in section 131(a)—

a) include a proposal for such an alternative formula; and

b) describe how the waiver demonstrates that a proposed alternative formula more effectively targets funds on the basis of poverty (as defined by the Office of Management and Budget and revised annually in accordance with section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2)) to local educational agencies with the State. (Section 131(b) of Perkins V). Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV).

RIDE will not submit an application for a waiver to the secondary allocation formula.

II.C.7. If the eligible agency will submit an application for a waiver to the postsecondary allocation formula described in section 132(a)—

a) include a proposal for such an alternative formula; and

b) describe how the formula does not result in a distribution of funds to the eligible institutions or consortia with the State that have the highest numbers of economically disadvantaged individuals and that an alternative formula will result in such a distribution. (Section 132(b) of Perkins V). Also indicate if this is a waiver request for which you received approval under the prior Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV)

RIDE will not submit an application for a waiver to the postsecondary allocation formula.

II.C.8. Provide the State's fiscal effort per student, or aggregate expenditures for the State, that will establish the baseline for the Secretary's annual determination on whether the State has maintained its fiscal effort, and indicate whether the baseline is a continuing level or new level. If the baseline is new, please provide the fiscal effort per student, or aggregate expenditures for the State, for the preceding fiscal year. (Section 211(b)(1)(D) of Perkins V)

Rhode Island's aggregate annual expenditures for CTE is $27,585,825, based on FY19. This not a new baseline and is not a waiver request.

d. Accountability for Results

- 1. Identify and include at least one (1) of the following indicators of career and technical education program quality—
    - a. The percentage of CTE concentrators (see Text Box 6 for the statutory definition of a CTE concentrator under section 3(12) of Perkins V) graduating from high school having attained a recognized postsecondary credential;
    - b. The percentage of CTE concentrators graduating high school having attained postsecondary credits in relevant career and technical education programs and programs of study earned through a dual or concurrent enrollment program or another credit transfer agreement; and/or
    - c. The percentage of CTE concentrators graduating from high school having participated in work-based learning. (Section 113(b)(2)(A)(iv)(I) of Perkins V)

Include any other measure(s) of student success in career and technical education that are statewide, valid, and reliable, and comparable across the State. (Section 113(b)(2)(A)(iv)(II) of Perkins V) Please note that inclusion of "other" program quality measure(s) is optional for States.

Provide the eligible agency's measurement definition with a numerator and denominator for each of the quality indicator(s) the eligible agency selects to use.

- 2. Provide on the form in Section V.B, for each year covered by the State plan beginning in FY 2020, State determined performance levels or each of the secondary and postsecondary core indicators, with the levels of performance being the same for all CTE concentrators in the State. (Section 113(b)(3)(A)(i)(I) of Perkins V)

Text Box 6: Statutory Definition of CTE Concentrator

The term 'CTE concentrator' means—

- (A) At the secondary school level, a student served by an eligible recipient who has completed at least 2 courses* in a single career and technical education program or program of study; and
- (B) At the postsecondary level, a student enrolled in an eligible recipient who has—
    - (i) Earned at least 12 credits within a career and technical education program or program of study; or
    - (ii) Completed such a program if the program encompasses fewer than 12 credits or the equivalent in total. (Section 3(12) of Perkins V)

* This means that once a student completes 2 courses in a single CTE program or program of study, they are counted as a CTE concentrator.

(Section 3(12) of Perkins V)

- 3. Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of Perkins V, which at a minimum shall include—
    - a. A description of the process for public comment under section 113(b)(3)(B) of Perkins V as part of the development of the State determined levels of performance (see Text Box 7 for the statutory requirements for consultation on State determined performance levels under section 113(b)(3)(B) of Perkins V);
    - b. An explanation for the State determined levels of performance that meet each of the statutory requirements in Text Box 8; and
    - c. A description of how the State determined levels of performance set by the eligible agency align with the levels, goals and objectives other Federal and State laws, (Section 122(d)(10) of Perkins V).

As part of the procedures for determining State determined levels of performance, describe the process that will be used to establish a baseline for those levels.

- 4. Provide a written response to the comments regarding State determined performance levels received during the public comment period pursuant to section 113(b)(3)(B) of Perkins V. (Section 113(b)(3)(B)(iii) of Perkins V).

As part of the written response, include a description of any the changes made to the State determined performance levels as a result of stakeholder feedback.

- 5. Describe how the eligible agency will address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) of Perkins V in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions the eligible agency will take to eliminate these disparities or gaps. (Section 122(d)(11) of Perkins V)

As part of the written response, and pursuant to the Report of the Senate Committee on Health, Education, Labor, and Pensions (HELP),[2] the eligible agency could indicate that it will analyze data on the core indicators of performance to identify gaps in performance, explain how they will use evidence-based research to develop a plan to provide support and technical assistance to eligible recipients to address and close such gaps, and how they will implement this plan. The eligible agency is not required to submit a new State plan prior to the third program year in order to address this requirement.

Text Box 7: Statutory Requirements for Consultation on State Determined Performance Levels

- (B) PUBLIC COMMENT.—
    - (i) IN GENERAL.—Each eligible agency shall develop the levels of performance under subparagraph (A) in consultation with the stakeholders identified in section 122(c)(1)(A).
    - (ii) WRITTEN COMMENTS.—Not less than 60 days prior to submission of the State plan, the eligible agency shall provide such stakeholders with the opportunity to provide written comments to the eligible agency, which shall be included in the State plan, regarding how the levels of performance described under subparagraph (A)—
        - (I) Meet the requirements of the law;
        - (II) Support the improvement of performance of all CTE concentrators, including subgroups of students, as described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965, and special populations, as described in section 3(48); and
        - (III) Support the needs of the local education and business community.

Text Box 7: Statutory Requirements for Consultation on State Determined Performance Levels

- (iii) ELIGIBLE AGENCY RESPONSE.—Each eligible agency shall provide, in the State plan, a written response to the comments provided by stakeholders under clause (ii).

(Section 113(b)(3)(B) of Perkins V)

[2] See page 11 of Committee Report at https://www.congress.gov/115/crpt/srpt434/CRPT-115srpt434.pdf.

II.D. Accountability for Results

II.D.1. Identify and include at least one (1) of the following indicators of career and technical education program quality—

a) the percentage of CTE concentrators (see Text Box 2 on the following page) graduating from high school having attained a recognized postsecondary credential;

b) the percentage of CTE concentrators graduating high school having attained postsecondary credits in relevant career and technical education programs and programs of study earned through a dual or concurrent enrollment program or another credit transfer agreement; and/or

c) the percentage of CTE concentrators graduating from high school having participated in work-based learning. (Section 113(b)(2)(A)(iv)(I) of Perkins V)

Provide the eligible agency's measurement definition with a numerator and denominator for each of the quality indicator(s) the eligible agency selects to use.

For Perkins accountability purposes, Rhode Island will adopt work-based learning (option C) as a secondary-level program indicator. Work-based learning (WBL) is a requirement of all students in CTE programs.

RIDE will continue to support and expect all students in programs to earn industry-recognized credentials and/or related college credit. Under the CTE Board Standards, all CTE programs must culminate in industry credentials and/or college credit. Since the culminating credential is college credit for some career fields and industry credentials for other career fields, RIDE would not be able to hold all programs accountable to a statewide target related only to college credit or only to credentials. However, programs in all career fields are required to meet any CTE Board Standards and the GWB work-based learning guidance, so that metric is more appropriate for RIDE's program quality metric.

The GWB created a guidance document for work-based learning that RIDE adopted as the minimum requirement for all work-based learning CTE programs. The GWB defines five types of work-based learning: internships, apprenticeships, service learning, industry-projects, and school-based enterprises. See Section II.B.2 on page 41 for a more information on the GWB work-based learning guidance.

The CTE Board is currently in the process of developing career field-specific work-based learning standards. These standards will be aligned to the GWB guidance, but may be more rigorous and specific. Once those standards are approved by the CTE Board and adopted by RIDE, RIDE will adjust this metric to align to those revised work-based learning standards.

5S3

Program Quality: Work-Based Learning

Numerator: Number of program concentrators in a graduating class completing high-quality work-based learning, as defined by the CTE Board Standards and the GWB Guidance.

Denominator: Number of program concentrators in a graduating class

Include any other measure of student success in career and technical education that is statewide, valid, and reliable, and comparable across the State. (Section 113(b)(2)(A)(iv)(II) of Perkins IV)

Postsecondary Success Index

In 2019, Rhode Island added two new high school measures to the state accountability system under the Every Student Succeeds Act (ESSA): the Commissioner's Seal measure, and Postsecondary Success Index. Together these two measures are called the "Diploma Plus" measures, so-named because they are based on a recognition that students in the 21st century need to graduate with a high school diploma *plus* some additional training or credential. The Diploma Plus measures are designed to recognize when schools better prepare students for postsecondary success by measuring two main features of preparedness: academic proficiency (as determined by students earned a Commissioner's Seal) and postsecondary credentials such as industry-recognized credentials, college credit, and credit-earning Advanced Placement scores.

RIDE believes that CTE and traditional academic coursework should not be separate tracks. Rather, all students should have access to an education that integrates traditional academics and career and technical education. To encourage that integration and alignment, RIDE will adopt the ESSA Postsecondary Success Index as an additional measure of program quality under Perkins V. This helps to ensure RIDE's ESSA accountability system and ESSA Report Cards are aligned to RIDE's Perkins accountability system and CTE Program Report Cards.

5S4

Program Quality: Postsecondary Success Index

Numerator: Number of program concentrators in a graduating class earning one or more of the following: industry-recognized CTE credentials, college credit, AP credit, and IB credit

See table below for more details on eligible credentials and credits.

Denominator: Number of program concentrators in a graduating class

The Postsecondary Success Index for Perkins will be calculated using the same business rules and methodology for Perkins as ESSA. The only difference is that the Perkins calculation will only consider CTE concentrators in both the numerator and denominator, while the ESSA calculation includes the entire graduating class.

The following are the list of credentials that count toward the Postsecondary Success Index:

Industry-recognized credentials:

- Credentials must be from the list of credential bundles approved by the CTE Board as the culminating credential for a career field. In cases where the CTE Board of Trustees requires multiple credentials for career field preparation, those are considered in bundles in which a credential is only counted if all in the bundle are earned.
- Students may earn these credentials through a CTE program or independently.

Concurrent/Dual enrollment:

- Only courses worth at least 3 credits are counted as one college credit course. Courses worth less than 3 credits cannot be added together to equal a 3-credit course. Courses worth 4 or 5 credits also count as one course.
- Students must earn a passing grade, defined as the level at which the relevant institution awards full college credit.
- The credit must be transcripted, not articulated, credit.

Advanced Placement:

Students must earn a 3 or higher on any AP exam.

International Baccalaureate:

Students must earn a 5 or higher on any Higher Level exam. Standard Level exams are not eligible.

After identifying all credentials earned by the cohort of high school graduates, each student's count of credentials is translated to a weight for the Postsecondary Success Index:

- Students who earn no credentials count as 0.
- Students who earn 1 credential count as 1.
- Students who earn 2 credentials count as 1.1.
- Students who earn 3 or more credentials count as 1.2.

See RIDE's Accountability site for more details about the Postsecondary Success Index calculation.

Program Completion Rate

RIDE will calculate a "program completion rate" metric that measures the percentage of students within a program who complete all requirements of the CTE Board Standards for that program. To count as a "completer" in this metric, students must:

- Pass all courses in the course sequence, including academic and technical coursework requirements
- Complete a work-based learning experience that meets the standards of the Governor's Workforce Board (GWB) Guidance and any additional CTE Board work-based learning standards
- Earn the culminating credentials required by the CTE Board Standards
- Demonstrate employability skills, as applicable

Note that this metric is calculated for each state-approved *program* within an LEA, not for the LEA as a whole. All the other metrics included in this section are aggregated at the LEA level.

5S5

Program Quality: Program Completion Rate

Numerator: Number of program concentrators in a CTE program's graduating class who completed the full requirements of the CTE Board Standards, including: completing the full course sequence, completing a work-based learning experience, earning the culminating credential, academic course sequence, and any employability skills.

Denominator: Number of program concentrators in a CTE program's graduating class

II.D.2. Provide on the form in Section V.B, for each year covered by the State plan beginning in FY 2020, State determined levels of performance for each of the secondary and postsecondary core indicators, with the levels of performance being the same for all CTE concentrators in the State. (Section 113(b)(3)(A)(i)(I) of Perkins V)

See Section V.

II.D.3.a Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of the Act, which at a minimum shall include a description of the process for public comment under section 113(b)(3)(B) of Perkins V as part of the development of the State determined levels of performance under that section as provided in the text box on the following page;

RIDE has aligned state-determined level of performance for Perkins with previously-established state goals whenever possible. For metrics where there were not previously-established goals and targets, RIDE considered historic data to determine target levels of performance.

The performance levels, alongside the state plan, were open to public comment from February 1, 2020 through March 2, 2020. RIDE made intensive efforts to engage stakeholders from the beginning of the plan development via stakeholder feedback sessions, surveys, summary documents, public presentations to the CTE Board, and a public comment period to promote accurate communication about changes in the plan.

II.D.3.b Describe the procedure the eligible agency adopted for determining State determined levels of performance described in section 113 of the Act, which at a minimum shall include an explanation for the State determined levels of performance; As part of the procedures for determining State determined levels of performance, describe the process that will be used to establish a baseline for those levels.

Secondary Measures

1S1

Secondary: Concentrator Graduation rate

Description: The percentage of CTE concentrators who graduate high school, as measured by the four-year adjusted cohort graduation rate (defined in section 8101 of the Elementary and Secondary Education Act of 1965).

Under the ESEA, Rhode Island is required to calculate four-year adjusted cohort graduation rate (ACGR).

Numerator: The four-year ACGR is the number of students who graduate from high school within four years with a regular high school diploma

Denominator: The number of CTE concentrators in the graduating class

"CTE concentrators" at a secondary level is defined as students who complete the second course in a state-approved CTE course sequence.

The "graduating class" cohort is defined as the number of students who enter grade 9 for the first time adjusted by adding into the cohort any student who transfers in later during grade 9 or during the next three years and subtracting any student from the cohort who transfers out.

Baseline: 84%

Target: 95% (6-year graduation rate for all students by 2025 – ESSA)

2S1

Secondary: Academic Proficiency in Reading/Language Arts

Description: "CTE concentrator proficiency in the challenging State academic standards adopted by the State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in reading/language arts as described in section 1111(b)(2) of such Act."

Proficiency is measured for high school students through the 11th grade SAT. Proficiency is defined as meeting the College Board's College Ready benchmark.

Numerator: Number of concentrators in graduating class with an SAT score on the ELA section above the College Ready benchmark

Denominator: Number of concentrators in graduating class

Baseline: 38%

Target: 69% (ESSA target)

2S2

Secondary: Academic Proficiency in Mathematics

Description: "CTE concentrator proficiency in the challenging State academic standards adopted by the State under section1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in reading/language arts as described in section 1111(b)(2) of such Act."

Proficiency is measured for high school students through the Mathematics section of the 11th grade SAT. Proficiency is defined as meeting the College Board's College Ready benchmark.

Numerator: Number of concentrators in graduating class with an SAT score on the Mathematics section above the College Ready benchmark

Denominator: Number of concentrators in graduating class

Baseline: 31%

Target: 68% (ESSA target)

2S3

Secondary: Academic Proficiency in Science

Description: "CTE concentrator proficiency in the challenging State academic standards adopted by the State under section1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments in reading/language arts as described in section 1111(b)(2) of such Act."

Rhode Island is in the process of developing a statewide science proficiency assessment. That exam has not yet been released statewide.

Numerator: Number of concentrators in graduating class with scores on the Rhode Island science assessment above the proficiency threshold.

Denominator: Number of concentrators in graduating class

Baseline: N/A (exam not yet released)

Target: N/A (targets for the science exam will be developed in a future ESSA state plan)

3S1

Secondary: Concentrator Postsecondary Enrollment

Description: "The percentage of CTE concentrators who, in the second quarter after exiting from secondary education, are in postsecondary education or advanced training, military service or a service program that receives assistance under title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C. 2504(a)), or are employed."

Rhode Island does not currently collect data on students who are in advanced training, military service, or eligible service programs. RIDE is exploring mechanisms to collect this data in future years.

Numerator: Number of concentrators who are in postsecondary education

Denominator: Number of concentrators in graduating class

Baseline: 63%

Target: 2 percentage points improvement each year

4S1

Nontraditional Program Concentration

Description: The percentage of CTE concentrators in career and technical education programs and programs of study that lead to non-traditional fields.

* Nontraditional fields are defined as those in which a subgroup is significantly underrepresented. For gender, "significantly underrepresented" is defined as 25% or less of a gender in a particular field. RIDE will develop numerical benchmarks for other subgroups.

Numerator: CTE concentrators in graduating class in non-traditional fields

Denominator: CTE concentrators in graduating class

Baseline: 5%

Target: 2 percentage point improvement each year

5S3

Secondary: Work-Based Learning

Description: The percentage of CTE concentrators graduating from high school having participated in work-based learning that meets the standards from the Governor's Workforce Board Guidance and any relevant CTE Board Standards.

See Section D.1 on page 67 for more information.

Numerator: Number of graduating concentrators having completed qualifying work-based learning

Denominator: Number of graduating concentrators

Baseline: Baseline will be set in FY20

Target: 2 percent improvement per year

5S4

Secondary: Postsecondary Success Index

Description: Under ESSA, RIDE is calculating a Postsecondary Success Index which measures the percentage of students in the graduating class who have earned an industry-recognized credential (from the CTE Board of Trustees Standards) or college credit (from dual enrollment, concurrent enrollment, AP, or International Baccalaureate).

Note: this index score may be above 100, because students can earn bonuses for earning multiple credentials.

For more information, please see Section D.1 on page 80.

Numerator: Number of concentrators in the graduating class who earned a state-approved industry-recognized credential or college credit. This includes a bonus of 0.1 for students earning 2 credentials, and a bonus of 0.2 for students earning 3 or more credentials.

Denominator: Number of concentrators in the graduating class

Baseline: [Awaiting data]

Target: 5% increase each year

5S5

Secondary: Program Completion Rate

Description: The percentage of students within a program who complete all requirements of the CTE Board Standards for that program, including: completing the full course sequence, completing a work-based learning experience, and earning the culminating credential.

For more information, please see Section D.1 on page 82.

Numerator: Number of program concentrators in a CTE program's graduating class who completed the full requirements of the CTE Board Standards

Denominator: Number of program concentrators in a CTE program's graduating class

Baseline: Not yet measured

Target: 2.5% increase each year

Postsecondary Measures

1P1

Postsecondary: Post-program placement

Description: "The percentage of CTE concentrators who, during the second quarter after program completion, remain enrolled in postsecondary education, are in advanced training, military service, or a service program that receives assistance under title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C. 2504(a)), or are placed or retained in employment."

Rhode Island does not currently collect data on students who are in advanced training, military service, or eligible service programs.

Numerator: CTE postsecondary concentrators who remained enrolled in postsecondary education

Denominator: CTE postsecondary concentrators - "CTE postsecondary concentrators" are defined as a student enrolled in an eligible Perkins-funded postsecondary program who has earned at least 12 credits within a CTE program, or completed such a program if the program encompasses fewer than 12 credits or the equivalent in total.

Baseline: Baseline will be set in FY20

Target: 2 percentage point improvement each year

2P1

Postsecondary: Earned Recognized Postsecondary Credential

Description: The percentage of CTE concentrators who receive a recognized postsecondary credential during participation in or within one year of program completion.

Numerator: CTE postsecondary concentrators in earning credential within one year

Denominator: CTE postsecondary concentrators who graduated one year earlier

Baseline: Baseline will be set in FY20

Target: 2.5 percentage point improvement each year

3P1

Postsecondary: Concentrator in programs leading to nontraditional fields

Description: The percentage of CTE concentrators in career and technical education programs and programs of study that lead to nontraditional fields.

Numerator: CTE postsecondary concentrators in nontraditional fields

Denominator: CTE postsecondary concentrators

Baseline: Baseline will be set in FY20

Target: 2 percentage point improvement each year

II.D.3.c. a description of how the state determined levels of performance set by the eligible agency align with the levels, goals and objectives other Federal and State laws, (Section 122(d)(10) of Perkins V).

Under the Every Student Succeeds Act (ESSA), RIDE updated its School and District Report Cards. These report cards provide the foundation for RIDE's system of school accountability and include a broader range of performance metrics. RIDE sees this as an opportunity to anchor its accountability work in the levers that RIDE knows make a difference, including not only traditional indicators—like test scores—but also leading indicators like attendance and suspension rates, which give a more holistic view of school climate, culture, and performance.

These Report Cards are designed to provide data in an accessible, transparent way for educators, policymakers, and—most importantly—students and families. RIDE wants all stakeholders to feel empowered to not only understand their school community, but also to make informed decisions for their families.

Wherever possible, RIDE aligned these performance goals to the goals set in ESSA and measured by these Report Cards. Other goals are aligned to the goals and policies of the CTE Board, which was created under Rhode Island General Law Chapter 16-45.

More specifically:

1. The student graduation rates (1S1 and 1S2) are aligned to the graduation rate goals established in Rhode Island's ESSA plan.
2. The indicators of academic proficiency in Reading/Language Arts (2S1), Mathematics (2S2) and Science (2S3), are aligned to the academic goals established in Rhode Island's ESSA plan.

- The work-based learning indicator (5S3) is aligned to the policies of the Governor's Workforce Board and the CTE Board.
- The Postsecondary Success Index indicator (5S4) is aligned to the Postsecondary Success Index included in the Diploma Plus measure of Rhode Island's ESSA plan.
- The Program Completion Rate indicator (5S5) is aligned to the policies of the CTE Board.
- The postsecondary Earned Recognized Postsecondary Credential (2P1) is aligned to the policies of the Department of Labor, Governor's Workforce Board, Office of the Postsecondary Commissioner, and CTE Board.

II.D.4. Provide a written response to the comments regarding State determined performance levels received during the public comment period pursuant to section 113(b)(3)(B) of Perkins V. (Section 113(b)(3)(B)(iii) of Perkins V). As part of the written response, include a description of any the changes made to the State determined performance levels as a result of stakeholder feedback.

RIDE did not receive any feedback during public comment related to state-determined levels of performance. Most of the feedback focused on how to better serve student subgroups, so RIDE added more details about how it defines student groups for the goals and metrics outlined in this plan.

II.D.5. Describe how the eligible agency will address disparities or gaps in performance as described in section 113(b)(3)(C)(ii)(II) of Perkins V in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions the eligible agency will take to eliminate these disparities or gaps. (Section 122(d)(11) of Perkins V)

Through the previously-mentioned annual CTE program accountability reporting and Perkins accountability reporting, RIDE will analyze data on program concentrators and the core indicators of performance to identify gaps in participation and performance. Where local gaps exist, RIDE will work with schools to determine root cause and apply research-based practices to close gaps. Where state level gaps are found, RIDE will identify state-wide research-based practices for implementation and conduct technical assistance to eligible recipients to address and close such gaps.

These implementation measures may be supported in part or whole through the previously described Equity Grant program funded through the Perkins Reserve Fund.

V. State Determined Levels of Performance (SDLP)

State Determined Performance Levels (SDPL) Form

Secondary Indicators

1S1: Four-Year Graduation Rate	84%[5]	89%	91%	92%	93%
1S2: Extended Graduation Rate	87.2%[6]	89%	90%	91%	92%
2S1: Academic Proficiency in Reading/Language Arts	38%[7]	56%	61%	65%	69%
2S2: Academic Proficiency in Mathematics	31%[8]	53%	58%	63%	68%
2S3: Academic Proficiency in Science	0* Baseline will be set in FY20	2%	4%	6%	8%

1S1: Four-Year Graduation Rate	84%[5]	89%	91%	92%	93%
3S1: Post-Program Placement	63%[9]	65%	67%	69%	71%
4S1: Non-traditional Program Concentration	5%[10]	7%	9%	11%	13%
5S1: Program Quality – Attained Recognized Postsecondary Credential	N/A	N/A	N/A	N/A	N/A
5S2: Program Quality – Attained Postsecondary Credits	N/A	N/A	N/A	N/A	N/A
5S3: Program Quality – Participated in Work-Based Learning	0%* Baseline will be set in FY20	2%	4%	6%	8%
5S4: Program Quality – Postsecondary Success Index	35%	37%	39%	41%	43%
5S5: Program Quality – Program Completion Rate	0%* Baseline will be set in FY20	2%	4%	6%	8%

Postsecondary Indicators

1P1: Post-Program Placement	0%* Baseline will be set in FY20	2%	4%	6%	8%
2P1: Earned Recognized Postsecondary Credential	0%* Baseline will be set in FY20.	2%	4%	6%	8%
3P1: Non-traditional Program Concentration	0%* Baseline will be set in FY20.	2%	4%	6%	8%

[5] https://reportcard.ride.ri.gov/201819/StateGraduation

[6] https://reportcard.ride.ri.gov/201819/StateGraduation

[7] https://www.ride.ri.gov/Portals/0/Uploads/Documents/Information-and-Accountability-User-Friendly-Data/ESSA/RhodeIsland-ESSA-State-Plan-Sept2017-FINAL-9-18.pdf (Page 82)

[8] https://www.ride.ri.gov/Portals/0/Uploads/Documents/Information-and-Accountability-User-Friendly-Data/ESSA/RhodeIsland-ESSA-State-Plan-Sept2017-FINAL-9-18.pdf (Page 83)

[9] Rhode Island's New Skills For Youth report, Table 5A

[10] Calculation of CTE Concentrators in non-traditional courses = 252/4687 or .05%.

Temporary Assistance for Needy Families (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:

(OMB Control Number: 0970-0145)

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.

If during an emergency the Departments deems it necessary, DHS household will receive a non-recurrent short-term benefit, sometimes referred to as a NRST. Rhode Island may issue a NRST benefit due to the COVID pandemic in FFY2020. This payment structure will not exceed four (4) months. The emergency benefit will be in accordance with 45 CFR §§ 260.31(b); 286.10(b).

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 begins 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 applies 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.

Public Involvement

Since passage of PRWORA in August 1996 and the implementation of Rhode Island's own welfare reform legislation in May 1997, RI DHS has maintained a strong and viable partnership with the initial Welfare Reform Implementation Task Force (WRITF). With the enacted Rhode Island Works Program, the WRITF group is now known as the Rhode Island Works Advisory Committee. The membership consists of representatives of state agencies, anti-poverty organizations, and community-based organizations that are committed to assisting the State and the Department in efforts to deliver an effective program for low-income families.

As defined by the Administrative Procedures Act (APA) and HHS Administration for Children and Families TANF State Plan requirements, draft rules on the RI Works Program were published on December 6, 2018, comments were formally heard and submitted to the Department for consideration by December 19, 2018. The Department has used the promulgation period to inform and support updates to the TANF State Plan.

The Rhode Island Works Program Advisory Committee has met monthly or bimonthly and receives progress reports, reviews and comments on policy and regulations, and offers recommendations to the Director on best practices and effective solutions to challenges and opportunities facing the State of Rhode Island.

Through both the formal public hearing process as well as the ongoing advisory committee meetings, the State of Rhode Island continues its commitment of transparency and openness with regard to its public assistance programs. The Department will continue to work closely with the community to ensure continuous improvement in our progress toward helping families out of poverty.

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. Employment plans are required prior to eligibility being granted to recipients, unless the adult recipient is exempted, an SSI recipient, or a non-requesting member of the households, also called child only.

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.

1. **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 childcare 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

How Workforce Activities Address Employment and Training Services

RI Works employment plans are comprised of a component and several activities associated with each component. Each activity is centered around building up the participant, providing coaching, long term goal setting, and barrier mitigation on that recipient's pathway to a more stable future. Every employment plan is comprised of at least one component and one activity. All activities are focused on engaging that family with holistic services to provide a change in their family's pathway to self-sufficiency. The five components in RI are organized to be step system to provide services for families so they can access training and work preparation. These components include: Supportive Services to help stabilize families in crisis with the goal of long term self-sufficiency; Teen and Family Development provides education services for parents under 20 year of age; Adult Education so parents can enter training or workforce services that have minimum education requirements; Vocational Training to provide specific trainings for parents in fields that are seeking employees; and Work Readiness which provides work experience and interview skills with a job search focus.

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)

1. **Rhode Island's Comprehensive Statewide Teen Pregnancy Prevention Plan**

DHS had an active role in a formal partnership with the RI Department of Health (RIDOH), Department of Education, the Department for Children, Youth and Families, and several community-based organizations, the partnership 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 lead buy RIDOH, 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 additional Community Based Organizations 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 exploration or goal setting, financial literacy, and leadership skills to RI youth.

2. **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.

1. **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)

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 Teen and Family Development (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. The TFD Program outreaches fathers in an effort not only to establish paternity and child support, but to encourage them to maintain an emotional relationship with their child. TFD is open to all eligible participants, regardless of sex, so that the recipient can receive specific services aimed to maximize services to younger RI Works recipients. DHS works with the Office of Child Support Services that provides services to non-custodial parents to seek work training opportunities and other resources such as counseling, if needed.

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)

RI's 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.

Adequate Access to Cash Assistance

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. The EBT card can be used in RI and nationwide at participating ATMs and point-of-sale (POS) devices. Any location that uses the NYCE or QUEST logo will allow for EBT card usage. There are over 900 POS locations statewide alone, these locations are in every city and town in Rhode Island.

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)

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. The EBT card can be used in RI and nationwide at participating ATMs and point-of-sale (POS) devices. Any location that uses the NYCE or QUEST logo will allow for EBT card usage. There are over 900 POS locations statewide alone, these locations are in every city and town in Rhode Island.

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.

FEES AND SURCHARGES FOR EBT TRANSACTIONS

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 http://www.dhs.ri.gov/Regulations/218-RICR-20-00-2RIWorksProgramRulesRegs.pdf .

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) (§263.2(b)(3) & §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.

1. **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.

1. **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.

TANF Certifications

States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the fiscal year, the State will:

The State Plan must include	Include
1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act);	Yes
2. Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act);	Yes
3. Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and privatesector organizations (section 402(a)(4) of the Social SecurityAct)—	
3. (A) have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and	Yes
3. (B) have had at least 45 days to submit comments on the plan and the design of such services;	Yes

The State Plan must include	Include
4. Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act);	Yes
5. Establish and enforce standards and procedures to ensure against program fraud and abuse,including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act);	Yes
6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—	
6.i. screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;	Yes
6.ii. refer such individuals to counseling and supportive services; and	Yes
6.iii. waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.	Yes

Trade Adjustment Assistance (TAA)

There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Yes

Jobs for Veterans' State Grants

(OMB Control Number: 1225-0086)

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. Once a client is determined to be an eligible veteran or eligible person with one or more Significant Barriers to Employment (SBE), as identified by the Secretary of Labor, they may be referred to a Disabled Veterans' Outreach Program Specialist (DVOP) to render intensive services. 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 DVOP 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. LVERs and/or AJC Staff will provide eligible 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, in conjunction with employers, that promote the benefits of hiring veterans; and

6. Promoting job fairs for veterans

7. 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 a 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 flowing 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 does not participate in the Incentive award program. Rhode Island's state employment classification system and collective bargaining agreements do not allow for bonus and/or incentive payments.

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;

Per Grant Officer Memorandum 01-20, a response to this section is not required.

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;

Per Grant Officer Memorandum 01-20, a response to this section is not required.

h. The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff; and

Information as requested by Grant Officer Memo 01-20 was provided.

i. Such additional information as the Secretary may require.

Rhode Island is prepared to provide whatever additional information the Secretary may require.

Unemployment Insurance (UI)

(OMB Control Number: 1205-0132)

The Unemployment Insurance (UI) program requires a State Quality Service Plan (SQSP) on a 2-year planning cycle that is a condition of receipt of administrative funding to administer the program. The SQSP is the State's UI performance management and planning process that allows for an exchange of information between Federal and State partners to enhance the UI program's ability to reflect their joint commitment to performance excellence and client-centered services. A formal two-year SQSP is submitted biennially. On the off years, States may be required to modify the SQSP with additional corrective action plans and narrative if they are failing any new performance measures, and they are required to provide updated budget documents, certifications, and assurances. ETA Handbook No. 336, 18th Edition provides detailed guidance for the preparation and submittal of the SQSP and supplemental guidance is provided in an annual UIPL, issued as UIPL 15-19 for the FY 2020 SQSP. The Social Security Act (SSA) sections 302 and 303 authorize the Secretary of Labor to provide funds to administer the UI program and govern the expenditure of those funds. States that choose the option to include UI in a WIOA Combined State Plan will be required to submit their SQSP through the Combined State Plan process. The SQSP must be prepared in accordance to the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a State chose to submit their SQSP through the Combined State Plan process.

a. Contents of a Complete UI SQSP Package

A complete UI SQSP package includes the following documents, as described in Chapter 1, ETA Handbook 336, 18th Edition:

1. Transmittal Letter

A cover letter to the appropriate Regional Office (RO) transmitting all the required SQSP documents.

August 28, 2019

Mr. Leo Miller

Regional Administrator

Boston/Philadelphia Regional Offices

U.S. Department of Labor

Employment and Training Administration

170 S. Independence Mall West

Suite 825 East

Philadelphia, PA 19106-3315

Dear Mr. Miller,

The Rhode Island Department of Labor and Training is pleased to submit the Alternate Year documents for the Fiscal Year 2020 State Quality Service Plan (SQSP).

If you have any questions or concerns regarding the State's SQSP materials, please contact Assistant Director Fernanda Casimiro at (401) 462-8543 or fernanda.casimiro@dlt.ri.gov.

Sincerely,

Scott R. Jensen

2. Budget Worksheets/Forms

Budget worksheets/forms and plan for program administration based on projected allocations received from the Federal partner. These forms include Worksheet UI-1 and SF 424, SF 424A and SF 424B. The SF 424A is only required if the State vary the quarterly distribution of base claims activity staff years.

Regarding SF-424 to be indicated at end of applicable section -

Descriptive Title of Applicant's Project: Unemployment Insurance Administration

Funding Total: $12,053,079.00

Project Start: 10/01/2019 Project End: 09/30/2020

Authorizing Representative: Mr. Scott R. Jensen, Director

A signed copy of the SF-424 and other appropriate budget-related forms are maintained with the State Agency and the Regional Office. Please see appendix for additional materials.

3. The State Plan Narrative

State Plan Narrative is a vital element of the SQSP that provides a vehicle for sharing with the Federal partner State-specific efforts that affect the administration of the UI Program. The State Plan Narrative allows the State to describe in a single narrative: a) State performance in comparison to the Government Performance Review Act goals; b) actions planned to correct deficiencies regarding UI programs, UI program reviews and reporting requirements; and c) results of customer satisfaction surveys (optional).

RHODE ISLAND DEPARTMENT OF LABOR AND TRAINING STATE QUALITY SERVICE PLAN

STATE PLAN NARRATIVE

(Rhode Island – Fiscal Years 2019 and 2020)

A: Overview

1. **State priorities and the strategic direction the state has adopted to ensure continuous improvement.**

For Fiscal Years 2019 and 2020, the Department has identified the following strategic plan to improve the UI program's service quality to the citizens of Rhode Island:

1. ***Preserve*** the outstanding performance levels the Unemployment office has achieved in the area of first payment and nonmonetary timeliness;
2. ***Improve*** non-monetary quality;
3. ***Focus*** sufficient resources on customer service by ensuring call wait times for customers who contact the UI call center by telephone at an acceptable level;
4. ***Embrace*** the Peak ensuring that busy seasons do not impact performance goals;
5. ***Continue*** to coordinate efforts to ensure maintained focus on national priorities.

Assessment of past performance and expected future performance. Includes, at state discretion, a discussion of external factors that may have performance implications.

Rhode Island's Performance in the area of First Payment Timeliness

Rhode Island has been exceeding performance goals in first payment timeliness since April 2016. To meet the standard, the Call Center analyzed the issues contributing to late payments and took action for long term improvements. Issuing timely first payments to eligible individuals continues to be one of the Department's highest priorities and a performance measure we pride ourselves in.

The State's overall performance in the area of first payment timeliness for the 12-month period from April 2017 thru March 2018 was 92.8%. RI had tied for the eighth highest score nationally in this area over that same time period. Rhode Island has remained off the "at risk" designation status assigned by USDOL since 2016. For the 12-month period ending March 2019, Rhode Island achieved a score of 91.8%.

R*hode Island's Performance in the area of Nonmonetary Timeliness*

For many years, Rhode Island had a history of struggling to meet nonmonetary determination timeliness. In 2009 our scores in this area dipped as low as 16%. Management and staff spent many years trying to identify strategies which would result in meeting the standard. Through hard work and dedication, dramatic improvements were made, and Rhode Island met the standard in June 2016. Improvements continue to be seen and the State achieved a score of 92.0% for the 12 months ending March 31, 2018. This is the highest performance level Rhode Island has achieved in reporting history. RI had the ninth highest score nationally in this area over that time period and remains well above the US average of 74%. For the 12 months ending March 31, 2019, the State achieved a score of 91.3%. We continue to focus on this measure and even with shrinking staff and resources we have been able to maintain excellent performance.

Rhode Island's Performance in the area of Nonmonetary Quality

The performance in the area of nonmonetary quality was not at the acceptable level for the 12 months ending March 31, 2018. Unfortunately, the performance for the 12 months ending March 31, 2019 was also not at the acceptable level. It is important to note that staffing levels in this unit have fluctuated during the reporting period and continue to be impacted today. With the current budget restrictions, we are unable to backfill as

individuals retire or resign to accept other positions within the state. We are committed to taking the necessary steps toward improvement in this area. Information on the Department's plan can be found in the workbook CAPs. In addition to our existing plan, we are looking to request technical assistance from the regional office in order to better understand the nonmonetary quality scoring elements and align our interpretations with those of our federal leaders.

Call Wait Times and Customer Service

The Department continues to include Call Center wait times in its top priority at a state level. It is important to note that our goal is to maintain an average weekly wait time of no more than 15 minutes. This could have the potential to impact other performance measures but to date it has had no negative impact on first payment timeliness.

For the 2017 calendar year, Rhode Island's call center maintained an average wait time of 10.5 minutes. Current year to date average wait time for 2018 has increased slightly to 13.7 minutes. A reduction in overall staffing levels in the Call Center and the inability to post vacant positions due to budgetary restrictions has contributed to this increase.

Coordination with other plans and commitment to national priorities.

Rhode Island works to reach state goals and priorities along with national priorities. Rhode Island's Department of Labor and Training is working diligently to operate the Unemployment Program effectively.

Workforce Innovation and Opportunities Act

The Department has always considered the reemployment of UI claimants a number one priority in the delivery of services. Largely because of the size of the State but also because of the structure of the divisions in the agency, it is common for UI program staff to be promoted to the outlying netWORKri offices, which provides advantage for direct UI assistance as necessary to UI claimants in the local offices. In addition, UI is working closely and developing effective strategies with both Workforce Development and the America's Job Centers (AJC) operators to provide the best possible UI assistance to affected customers.

The Department's Unemployment Insurance Service Center (UISC) hires and employs individuals in entry-level positions. These individuals learn the Unemployment Insurance program, its laws, processes and procedures, before moving on to other positions within the agency. Staff in these positions are often promoted to Principal Employment and Training Interviewer positions in our AJCs under Wagner-Peyser, Trade, and WIOA.

Each office is staffed with a number of former UI staff members who are able to provide meaningful guidance to individuals seeking assistance with unemployment insurance benefits. The on-site staff is trained in UI Programs and assist claimants in filing claims on the web using the netWORKri resource room.

There are also procedures in place for individuals seeking information concerning their UI claims. Each netWORKri is equipped with kiosks that customers can use to electronically

send emails to the UISC for information or assistance. The UI Help email process has been very successful allowing claimants to receive a phone call at home or on a cell phone. This quick access to the UI program reduces the number of calls coming into the UISC and allows individuals who need help to receive it in a timely manner.

For those individuals who require immediate assistance with either filing their claims via telephone or determining the status of their claim, staff in the AJC will direct the individual to a designated telephone area so that UISC staff can contact them directly. AJC staff contact a designated manager in the UISC, provide the name, last four of the Social Security number and direct line at which to call the customer back. If that manager is not available, they have backup managers and administrators they may contact as well.

Finally, the close working relationships established over the past several years between the netWORKri management and the UI program team allows immediate action to be taken on behalf of individuals who are in need of comprehensive assistance. The open lines of communication between both of these units and the partnership that has been fostered continues to be a priority with this administration and has proven to allow for higher quality service to those most in need.

The Overpayment Unit of the Unemployment Insurance Service Center continues to place emphasis on the recovery of overpayments of benefits through benefit payment offsets, state income tax returns, Federal Treasury Offset Recovery, IRORA, lottery winnings, and prosecutions. When individuals are prosecuted at Superior Court, collections are processed directly through the court as part of sentencing, and all recoveries are paid by the courts to our department on a monthly basis.

The Overpayment Unit continues to facilitate the detection of overpayments through the Crossmatch Program, National and State Notices of Hire, claims interviewing, employer protests of charges, anonymous tips, and investigations referred from the Fraud Unit.

Rhode Island is continually exploring ways to automate our systems for detection and recovery of overpayments. Our consortium team has spent countless hours working on requirements for our Benefit Payment Control processes and crossmatches and has collaborated with Maine and Mississippi to develop new strategies and implement existing strategies that have proven productive in individual states.

The Crossmatch Unit continues to review both the National and State Directories of New Hires, as well as the quarterly Wage Crossmatch report to determine any potential overpayments due to claimants continuing to receive Unemployment Insurance benefits after they have returned to work.

Two modifications have been developed in our Crossmatch process and were implemented in 2017. These changes will reduce total dollar amounts of benefit year earnings overpayments significantly. Preliminary metrics related to the Wage Record Crossmatch modifications indicate a full-week's decrease in the average number of weeks per overpayment.

- Wage Record Crossmatch: Quarterly crossmatch reach-back to second quarter back will now reaches back to the most recent completed quarter and is run on a monthly rather than quarterly schedule.
- NDNH Crossmatch: Reach-back was modified from five (5) weeks to seven (7) weeks.

The Department also receives a crossmatch report from the Department of Corrections to establish if claimants may have collected while incarcerated. Staff receives continued training in the detection of potential overpayments in the course of interviewing claimants. Rhode Island is currently investigating the possibility of a crossmatch of State employees against the claim file to detect any internal fraud and is further working to upgrade computer systems to identify fraud schemes.

Based on hits received from the National Directory of New Hires, reported return-to-work dates are auto-posted to the UI claim. At the same time a letter is auto-generated to affected claimants instructing them to contact the department if the information received is not accurate. Claimants are provided the email address and phone number to contact the department in the event that a staff member is not successful in reaching them by phone.

In addition, staff review the NDNH list, contact the claimants by phone and question as to the accuracy of the employer information on the NDNH. If the claimant disputes the issue or never responds to the phone call or letter, staff remove the return to work date from the system. The claimant will be scheduled for an adjudication appointment where the employer and the claimant will have an opportunity to give a statement. The claimant will be allowed to receive weekly benefits until the week of the adjudication appointment. A determination will be made within seven to fourteen days.

Rhode Island has recently begun to capture the IP address for each weekly certification that is processed online. This tool is used to help the Department detect fraud and to investigate instances of questionable certifications. We have developed inquiry reports that are produced on-demand from the internet claims system to help identify identity theft claims. We can identify suspicious address changes, blank drivers' license fields, etc. These reports, as well as others we've developed, have been instrumental in helping us to identify these fraudulent claims before ever being paid in most cases.

In addition, we have developed several new automated reports designed to detect instances of internal fraud at their earliest stages.

The Fraud Unit continues to investigate potential fraud cases from a number of sources when individuals are working and receiving Unemployment Insurance benefits. The unit currently consists of three Fraud Investigators and one-unit manager. During the most recent FFY, the Fraud Unit completed 205 investigation relating to benefit year earnings and identified $602,280 in improperly paid benefits. In addition, 108 claims were reviewed for potential identity theft resulting in 104 fraudulent claims being stopped and preventing an additional $616,013 in improperly paid benefits.

In an effort to avoid prosecution, a claimant is notified by mail to contact the Fraud Unit within 15 days of the mailing date of the letter to arrange restitution. If the claimant fails to contact the Fraud Unit, the case is referred to the State Police for further investigation.

The Office of the Attorney General maintains a prosecutor on staff to solely work on the cases referred by the Department. These individuals are generally charged with obtaining money under false pretenses in a sum over $1,500, which is a felony offense. The relationship has been productive and will continue into the future. For the 12-month period ending 7/31/19, 36 individuals committing UI fraud have been prosecuted and ordered to repay a total of over $376,999 in restitution to the Department.

In addition, Rhode Island has built a strong working relationship with both the RI State Police and the US Department of Labor – Office of Inspector General. These relationships have allowed UI to further investigations and publication of many of our highest dollar amount and federal program cases. In addition, incidents of employer fraud are now in the first stages of being investigated by our teams.

Finally, the Department conducted a L.E.A.N. review of the Benefit Payment Control Unit. An area of concern was detected in the Wage Verification form. Many participants felt the form was too difficult to read and understand. Therefore, the form was revised to be less cluttered and easier to read. At the current time, a test is being conducted to determine whether the improved form is resulting in more employers responding to wage verification requests.

Misclassification Enforcement in Rhode Island

The State of Rhode Island utilizes a task force approach in investigating employee misclassification. The task force is comprised of investigators and enforcement agents from the Department of Revenue and the Department of Labor and Training Workforce Fraud Unit and Workers' Compensation Division.

The investigators and agents gather relevant evidence of employee misclassification which results in the disposition of cases through Settlement Agreements and Administrative Hearings. Penalties are enforced in accordance with state law and tax audits are conducted on all employers where a determination has been made that they misclassified workers.

B: Federal Emphasis (GPRA Goals)

1. **State performance compared to the GPRA goals**

Percent of Intrastate Payments Made Timely

Target: 87.0 percent of intrastate first payments for full weeks of unemployment compensation will be made within 14/21 days from the week ending date of the first compensable week.

Rhode Island has met the recommended 87.0% since 2016. For the 12 months ending March 31, 2018, Rhode Island's first payment timeliness rate is 92.8%. Continuing to achieve high

levels of first payment timeliness remains one of the Department's highest priorities. For the 12-month period ending March 2019, Rhode Island achieved a score of 91.8%.

Detection of Recoverable Overpayments (Detect Benefit Overpayments)

Target: Overpayments established will be at least 54.5 percent of the estimated detectable, recoverable overpayments.

For the period April 1, 2017 through March 31, 2018 Rhode Island's Overpayment Detection Core Measure was 65.22%, well-above the required 54.5% performance measure.

Unfortunately, for the period April 1, 2018 through March 31, 2019 Rhode Island's Overpayment Detection Core Measure was 48.41%, below the required 54.5% performance measure. Rhode Island has experienced challenges with staffing in the Benefit Payment Control (BPC) Unit for the past year. All three staff who render benefit year earnings determinations have been out on extended sick leave at various times throughout the year. In addition, the department has been unable to fill vacant positions in the BPC unit due to administrative budget concerns. As a result, detection of overpayments has been impacted. The unit is currently operating with a FTE deficit in our Crossmatch and Determinations staff. However, we have increased the number of daily cases assigned to our Determinations staff. We're working with our IT staff to produce productivity reports for the last year so that we can identify performance issues and identify areas we can make improvements. In addition, we're analyzing our workflow process to ensure all employer responses indicating a potential issue are properly identified through our programming for workflow. Finally, we're scrutinizing our ETA-227's to ensure our detected overpayments are being reported accurately in our overpayment system.

Employer Tax Liability Determinations Made Timely (Establish Tax Accounts Promptly)

Target: 89.0 percent of status determinations for new employers will be made within 90 days of the end of the first quarter in which liability occurred.

Rhode Island has consistently exceeded this performance measure. Most recently reaching 96.3% in 2018 and 95.8% in 2019.

1. **Actions planned to achieve GRPA goals and targets.**

Detecting Recoverable Overpayments

Rhode Island is taking steps to improving the detection of recoverable overpayments. We have increased the number of daily cases assigned to our Determinations staff. We're working with our IT staff to produce productivity reports for the last year so that we can identify performance issues and identify areas we can make improvements. In addition, we're analyzing our workflow process to ensure all employer responses indicating a

potential issue are properly identified through our programming for workflow. Finally, we're scrutinizing our ETA-227's to ensure our detected overpayments are being reported accurately in our overpayment system.

State Self-Assessment: Utilize Findings

The state self-assessment is underway and has already resulted in internal findings. Administration and management are teaming up to identify and prioritize needed procedural guidance and trainings. This will be a big task that will require an abundance of time and resources. We are committed to ensuring our policies and procedures are updated and practiced but realize these changes will be ongoing.

We are hopeful that addressing the items identified will assist our staff in continuing to process timely claims and issuing timely payments and non-monetary determinations. We are hopeful that the information identified in the state self-assessment will also provide some additional ideas to help nonmonetary quality scores.

Embrace the Peak: Maintain Quality Service During Busy Seasons

Since April 2016, the Department has coined the phrase "*Embrace the Peak"*, which was designed to improve service quality to the citizens of Rhode Island – particularly during the Department's busiest or "peak" periods. In doing so, the Assistant Director holds full staff meetings in advance of peak periods to "boost" staff morale and cheer on staff for the anticipation of increased workloads. These meetings have been well received and our internal performance goals have been met.

Rhode Island strives to keep wait times below 20 minutes during these periods and pending claim backlogs below 400 claims at any given time. While it has been challenging to maintain first payment timeliness, claims filing, and call wait times when our workloads are at their highest it has been accomplished each winter and summer peak since inception. We will continue to keep the "Embrace the Peak" mindset strong as we prepare for the upcoming increase in workloads and the reality of staffing level decreases.

Performance Management

Since the most recent recession, Rhode Island has been tracking and reporting internal performance measures through a Daily Workload Report. These measures include pending claims, email responses, and call wait times. This has proven to be helpful in workload forecasts and productivity evaluations.

As we prepare for potential staffing level reductions, it is crucial to dig deeper and report on other miscellaneous workload counts. The Call Center's Principal Manager is spearheading a new reporting requirement for front line management. The goal is to have a daily back office workload tracking system. This tool will be used to monitor productivity and assist in identifying potential increases in miscellaneous workloads which could have a negative impact on wait times and/or payment timeliness. By addressing these workload increases daily, management will be able to take immediate action to prevent harmful impacts to other critical areas.

Tax Performance System: Establishing Tax Accounts Promptly

The Tax Performance System (TPS) Report submitted during FY 2018, which examined twelve (12) functions in the Employer Tax Section, concluded that all operational levels of performance were either met or exceeded results.

One of the most important TPS measurements is the prompt establishment of tax accounts, and Rhode Island will continue to make that critical tax function a top priority. The most recent TPS review determined that Rhode Island had established 96.3% of new accounts within 90 days of the liability date, and 98.2% within 180 days. We will continue to take all reasonable actions to ensure that every new Rhode Island employer is assigned a UI account number as soon as possible

The Employer Tax Section website, used by employers to obtain information about Rhode Island UI, TDI, and JDF taxes, to register as an employer and obtain an employer registration number, and to file their UI Tax and Wage Reports via the Internet, continued to operate successfully. Employers are encouraged to file online. Continued modifications were made to the filing options which allowed the operation to become more user- friendly.

Rhode Island's work with Maine and Mississippi as a consortium (MRM) has temporarily been put on hold due to funding issues.

C: Program Review Deficiencies

Rhode Island has conducted all required reviews.

D: Program Deficiencies

Rhode Island's program reviews have not identified any deficiencies at this time.

E. Reporting Requirements

Rhode Island accidentally missed the deadline for the ETA 9016 report. While this was due in April, Rhode Island submitted it on August 5, 2019.

Rhode Island made some programming changes to the ETA – 204 report. These changes caused some concerns and questions which then placed the submittal on hold until everything was rectified. Sections A&B were submitted on July 17, 2019 and section C was submitted on August 6, 2019.

Rhode Island did not submit the AR 9048 because we stopped providing Worker Profiling Reemployment Services when RESEA became available in every AJC. We have followed up with the regional office and they have not expressed any concerns regarding our action.

F. Customer Service Surveys

Surveys are not included in this narrative.

G: UI Trust Fund Solvency

The balance in the Rhode Island Employment Security Fund was $407,100,408 as of June 30, 2018. This was an increase of $91 million from June 30, 2017. The balance in the fund as of June 30, 2019 was $494,977,255. This again represents an increase from the prior year's balance and is great news for state's employers and unemployment system. The Rhode Island Department of Labor and Training completely repaid its federal UI loans on May 5, 2015 and has been rapidly rebuilding fund reserves since that time. The State's outstanding loan balance peaked at $291.8 million during April 2012.

Rhode Island's ability to reduce its outstanding federal balance and rebuild trust fund reserves was greatly enhanced by the passage of Article 4 of the FY 2012 Appropriations Act. Article 4 implemented adjustments to the Unemployment Insurance taxable wage base provisions beginning on January 1, 2012 and adjustments to Unemployment Insurance benefit provisions beginning on July 1, 2012. On the employer tax side, the taxable wage base went from a fixed amount based on the Employment Security Fund reserve to a variable amount equal to 46.5 percent of Rhode Island's average annual wage in January 2012. For CY 2012, the taxable wage base for most employers was $19,600. The taxable wage base for employers with the highest negative reserve account percentages was $21,100, which is $1,500 above the level set for all other employers. In CY 2013, the taxable wage base rose by $600 to $20,200 for most employers and $21,700 for employers with the highest negative reserve account percentages. In CY 2014 the taxable wage base rose by $400 to $20,600 for most employers and $22,100 for employers with the highest negative reserve account percentages. In CY 2015, the taxable wage base rose by $600 to $21,200 for most employers and $22,700 for employers with the highest negative reserve account percentages. In CY 2016, the taxable wage base rose by $800 to $22,000 for most employers and $23,500 for employers with the highest negative reserve account percentages. For CY 2017, the taxable wage base rose by $400 to $22,400 for most employers and $23,900 for employers with the highest negative reserve account percentages. For CY 2018, the taxable wage base rose by $600 to $23,000 for most employers and $24,500 for employers with the highest negative reserve account percentages. Currently in CY 2019, the taxable wage base rose by $600 to $23,600 for most employers and $25,100 for employers with the highest negative reserve account percentages.

On the benefits side, the maximum weekly benefit amount formula percentage was adjusted effective July 1, 2012. It was previously set at 67 percent of the statewide average weekly wage. This article reduced the percentage to 57.5 percent of the statewide average weekly wage. As of July 1, 2018, the maximum weekly benefit amount rose from $566 to $576. Had the legislation not been passed, today's maximum weekly benefit amount would have been $671.

For individual workers, the total amount of benefits payable during a benefit year was reduced from a maximum of 36 percent of total wages during his or her base period, to 33

percent effective July 1, 2012. In addition, the percentage of an individual's earnings replaced by Unemployment Insurance benefits was reduced from 60 percent to 57 percent on July 1, 2012, to 54 percent on July 7, 2013 and was further reduced to 50 percent on July 6, 2014.

These changes and an improved economy enabled the Employment Security Fund to quickly rebuild its reserves. Based on our improved trust fund reserves, Article 3 of the FY 2016 Appropriations Act was enacted which made several changes to our UI tax structure. The range of tax rates was expanded by adding three new categories at the lower end of the tables. This change reduced the minimum UI tax on employers from 1.69% to 0.99% for CY 2017. Article 3 also lowered the reserve percentages for each of our nine tax schedules to make it easier to move to a lower tax schedule as reserves built up. As a result, we moved off our highest tax schedule, Schedule I, for the first time in 25 years to the next lowest tax schedule, Tax Schedule H, for CY 2017. This will reduce RI employer UI taxes by approximately $30 million. As projected, our reserves increased which directly resulted in a trigger to the next lower tax schedule. Rhode Island is currently on tax schedule G which has provided the employer community with an estimated $10 million in savings for this calendar year.

H: Assurances

Assurance: Equal Employment Opportunity/Affirmative Action

In accordance with RIGL § 28-5.1, equal opportunity and affirmative action toward its achievement is the policy of all units of Rhode Island state government, including all public and quasi-public agencies, commissions, boards and authorities, and in the classified, unclassified, and non-classified services of State employment. All policies, programs, and activities of state government shall be periodically reviewed and revised to assure their fidelity to this policy.

Each State agency has an Affirmative Action Plan publication that outlines numerous policies and practices instituted to ensure an equal opportunity/affirmative action environment. This Plan is available for review at the respective human resources office.

Assurance: Administrative Requirements and Allowable Cost Standards

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all applicable federal and State statutes, regulations, formal polices, and/or established practices expressly complies with appropriate administrative requirements and allowable cost standards.

Assurance: Management Systems, Reporting, and Recordkeeping

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper management system, reporting, and recordkeeping procedures.

Assurance: Program Quality

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper program quality practices and procedures.

Assurance: Use of Unobligated Funds

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper practices and procedures related to use of unobligated funds.

Assurance: Prohibition of Lobbying Costs

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper practices and procedures related to prohibition of lobbying costs.

Furthermore, the Hatch Act restricts Executive Branch employees in any agency of State government whose principal employment is in connection with an activity financed, in whole or in part by federal loans or grants from being a candidate in any partisan contested election.

Employees who are concerned that their political activities may be subject to the Hatch Act may obtain an advisory opinion from the United States Office of Special Counsel.

In addition, Rhode Island General Laws contain prohibitions on classified employees from seeking the nomination of or being a candidate for any elective State Office and also contain prohibitions on classified employees regarding running for partisan political office, campaigning for public officials during working hours and soliciting political contributions for or being solicited for political campaigns. Violations of these statutes can result in demotion or dismissal.

Assurance: Drug-Free Workplace

The State of Rhode Island, in accordance with Executive Order 89-14 and the State's Drug Free Workplace Policy, prohibits possession, use and distribution of illegal drugs in the workplace. The only exceptions to this policy are those specified by RIGL § 21-28.6, known and cited as The Edward O. Hawkins and Thomas C. Slater Medical Marijuana Act.

In addition, each employee is required by law to inform the agency within five days after (s)he is convicted for violation of any federal or state criminal drug statute. A conviction

means a finding of guilt, a plea of guilty, regardless of the imposition of any sentence. Employees who violate this Drug Free Workplace Policy will be subject to disciplinary action.

The State encourages any employee with a drug abuse problem to seek assistance from the Care24 Employee Assistance Program. For further information and details, see the State's Drug Free Workplace Policy available at http://www.hr.ri.gov.

The Rhode Island Department of Labor and Training, participates in the State of Rhode Island disaster recovery plan. This is a comprehensive set of procedures whose goal is recovery from an event that disables the existing information technology infrastructure with minimal disruption to critical business functions. The data recovery process is still intact. The Department participates in the Enterprise disaster recovery plan and test. The IT Contingency Plan was implemented in January 2010, was last tested in March 2018, and last reviewed in March 2018. The next test has not been scheduled yet as it is being coordinated with the State's Enterprise Recovery Plan.

The Department's Continuity of Operations Plan (COOP) outlines the procedures that are in place in the event of a natural disaster, pandemic or other emergency in order to continue to provide essential income support services to RI workers and to operate its Income Support Division which includes Unemployment Insurance. The plan provides an emergency organization structure and communications network. While this plan provides a blueprint for actions that will allow the Department to maintain its essential services during an emergency situation, it is to be considered a work in progress that will be updated and amended as situations arise and dictate.

Critical to the Enterprise Disaster Recovery Plan and the Department's COOP are the prioritization of functions for the Income Support Division, namely, Unemployment Insurance. Our main priority is to provide on-going customer service and to respond to customers' requests and inquiries. The second priority is to process UI payments in a timely manner and the third is to process the claims timely to ensure they are completed and ready when payment is due.

Assurance: Conformity and Compliance

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper practices and procedures related to conformity and compliance.

The UI program has prepared an SSR for the IRS as required for participation in the Treasury Offset Program. This document was submitted and accepted by the IRS on October 1, 2018. As specified in IRS Publication 1075, an accurate and approved SSR is accepted by the

IRS as a System Security Plan. The SSR is consistent with the security plan guidelines provided by NIST in SP800-16 which provides a baseline SSP for the UI program. The System Security Plan was last reviewed in March of 2018 when the IRS conducted and onsite Safeguards Security Review.

The Department of Information Technology (DoIT) is in the process of revising Security Planning Policy and the planning policy document is currently undergoing final review. The draft calls for each state business unit to develop a System Security Plan that documents security controls in place for that unit, following NIST guidelines. The SSR addresses most of the elements called by the (draft) policy and will provide a basis satisfying DoIT policy. A POA&M is currently in place to develop a security plan for the Department. A copy of the POA&M is provided with the current DOL submission

Rhode Island is within the three-year cycle for conducting Risk Assessment as the latest one was signed in April, 2018. The next scheduled Risk Assessment will occur in the Spring of 2021

Assurance: Confidentiality

The State of Rhode Island and its subsidiary agencies and entities, including the Rhode Island Department of Labor and Training, in accordance with all federal and State statutes, regulations, formal polices, and/or established practices expressly complies with proper practices and procedures related to confidentiality.

4. Corrective Action Plans (CAPs)

CAPs are expected as a part of the SQSP when State's annual performance does not meet the established criteria for core measures, Secretary's Standards, UI program, assurances, and other program deficiencies identified in the annual SQSP guidance provided by the Department. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

NONMONETARY DETERMINATION QUALITY

Corrective Action Plan Summary

A. The Reason for the deficiency.
After reviewing our BTQ cases that failed the review, the majority of cases failed due to the adjudicator not having enough information in the claimant or employer statements as well as not asking the right questions to render a proper decision. The information obtained was just not sufficient to come to a supportable conclusion at the end of the investigation.
B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective

action plan.
"Our plan to improve our BTQ scores will begin with the BAM Unit reviewing 5 additional cases each week and scoring them using the BTQ criteria. The BAM Manager and CAU Managers will then meet with the adjudication staff as a group on a monthly basis to discuss the quality of the extra cases being evaluated. This will help us be pro-active with our evaluation of our current case load.
The CAU managers will review 3 cases (1 termination issue, 1 quit issue and 1 non-sep issue) for 2 adjudicators, each week. Each case will be evaluated by the CAU Management team based on the information obtained (using our CAU guide questions as the standard), the written determination based on the facts of the case along with the supporting documentation and the overall effectiveness of the interview. The managers will listen to each of the actual phone calls to determine the quality of the interview and evaluate the written statement relating to each call. Each case will then be evaluated and scored by the managers. Each selected adjudicator will meet individually with the managers to listen to the calls and evaluate the cases. We believe this part of our plan will be effective in holding the adjudicators accountable for their work and elevate their decision making process.
All of our additional case evaluations will be discussed with the individual adjudicators and each evaluation will be tracked on a spreadsheet, showing the progress that is being made by each adjudicator. Following each BTQ quarterly review, the CAU managers in conjunction with the BAM manager will identify:
1) if the BTQ failures were limited to a small of number of adjudicators making the same mistakes. This will result in a one on one meeting with the adjudicator(s) to discuss policy.
2) If the BTQ failures involved multiple adjudicators making the same mistakes. This will result in a training session for the entire adjudication staff.
3) If the BTQ failures are widespread among the adjudication staff regarding a similar issue, this will result in management confirming, in writing, the policy that is confusing the staff. The policy will then be clearly communicated to the staff.

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance
goals.
Continued meetings with BAM management and review of cases that pass or fail.

EFFECTIVE AUDIT MEASURE

Corrective Action Plan Summary:

RI failed factor 2 and is working to correct the problem. RI has done an investigation on how to increase this score while not impacting other areas

A. The Reason for the deficiency.

RI did not have enough change in total wages from audits and as a result scored less than 2
Alternate Year Plan Updates

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.
RI is going to investigate why this happened and determine what steps can be taken to increase this number while not impacting the other factors

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.
RI Chief and field audit supervisor are going to investigate this issue and determine ways to bring up this factor. They will meet monthly and monitor if there is improvement based on what they have implemented.

IMPROPER PAYMENTS MEASURE

Corrective Action Plan Summary:

A. The Reason for the deficiency.
Rhode Island has experienced incremental increases in Improper Payments due to work search requirements. Based on cause analysis, work search continues to negatively impact our improper payment rate because of restrictive language in our Rules and Regulations. The previous language required work search contacts to be verifiable. In many cases, a work search contact cannot be verified due an employer's applicant purge practices, or small business' lack of ability to store applications, etc. Also, some employers cannot be reached for verification after exhaustive attempts. In cases where the contact cannot be absolutely verified due to the aforementioned reasons, investigators will now have the latitude to determine based on the available information whether it can be reasonably assumed the claimant did make work search contact.

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a

description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.
"Plan: UI submitted changes to the UI/TDI Rules and Regulations in 2016 which would no longer require work search contacts to be verifiable. Those updates to the Rules and Regulations became effective as of August 7, 2018. This will afford staff some latitude in determining whether or not a contact for employment meets Rhode Island's standard for qualifying for a payment. Training has been provided to BAM investigators on the proper and consistent application of the work search requirements within the BAM process. The Administrative Office is confident staff are now applying the rule consistently and properly in all cases. Continued review and training will be provided based on monitoring and data analysis. Finally, Rhode Island will request Technical Assistance from the Regional Office of US DOL if no improvement is shown following the third quarter 2018.
Do: In interviewing the employer and the claimant, BAM investigators will determine the validity of the contacts, and will investigate all three submitted for the key week, etc. We have strengthened our messaging to customers on the work search requirements by requiring staff to advise every caller of UI's work search policy.
Check: Each case submitted is reviewed by the BAM supervisor. Every work search determination will be reviewed and verified as having met or not met the work search policy and rule. We will regularly monitor our Improper Payment rates to assess the need to implement further changes.
Act: The impact of claimant messaging around the work search requirements will be discussed in weekly meetings with the Administrator overseeing BAM. If adjustments are required to any of these processes, those will be developed on an as-needed basis.

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful. Due to delays in approval of our rule changes regarding work search requirements, Rhode Island was unable to improve work search improper payments. UI Administration is confident that the approval of our more realistic rule and continued monitoring and training will prove to significantly improve our improper payment rate in a short period of time.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.
The impact of claimant messaging and application of rule changes around the work search requirements will be discussed in weekly meetings with the Administrator overseeing BAM. In addition, staff training will be provided on an as-needed basis based on review of BAM cases to ensure accurate and consistent coding. If adjustments are required to any of these processes, those will be developed on an as-needed basis. We will regularly monitor our Improper Payment rates to assess the need to implement further changes.

BENEFITS DATA VALIDATION

Corrective Action Plan Summary:

A. The Reason for the deficiency.
RI was required to validate populations 3, 3a, 4, 5, 12, 13, and 14 in FY 2018. Initially there were problems running the extracts. We requested that the extract files for the seven populations be run at the end of March for the fourth quarter 2017. The programmer did not have permission to access the Sun Server and on two occasions created the extracts for incorrect quarters. In addition, the lead validator had a family emergency resulting in several days of loss work. These issues delayed the start of the validation until the mid of May leaving just four weeks to validate all seven populations. Since population 12 was the only population to pass the report element portion of the validation, the decision was made to validate just populations 4 and 12 since the remaining populations would need to be validated in the next fiscal year.

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.
Our corrective action plan is to begin the validation process
earlier.

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.
D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance
goals.
Populations 3, 3a and 4 will be validated during the quarter ending 12/31/18
Populations 12, 13 and 14 will be validated during the quarter ending 3/31/19
Population 5 along with Mods 3 and 4 will be validated during quarter ending 6/30/19

TAX DATA VALIDATION

Corrective Action Plan
Summary:

A. The Reason for the deficiency.
"RI has been working on the consortium project and as a result was unable to run data validation extracts as much as it would have liked due to limited resources. RI has since trained the TPS supervisor in the data validation process so that next year RI will be able to run these extracts on a more frequent basis as a result RI should have less failure and be

able to submit passing populations.
RI Failed population 1 because RI had reimbursable accounts that were active that had more than 8 quarters of zero.
RI failed tax population 3 because the file extract was pulling in the wrong dates for successor accounts that had a change in liability date after the
fact.
Population 4 for RI is still a work in progress. RI has yet to create an extract file for this population that is working correctly. This population extract is very complicated. RI while working on the consortium project had stopped working on updating the program for population 4 as RI was designing a new program for the consortium.
Population 5 failed because one audit was coded as a change audit in our system in error and when the data validation software ran is was picked up as a no change audit. Do to this one error it caused us to fail population 5.
Module 3 was not submitted and validated in time for the deadline but has been since been submitted and finalized.
Module 4 failed because in 2017 RI had a changeover in staff in the audit entry process. The new staff member was entering the completion date as the date the auditor finalized the audit but did not account for the time it took the supervisor to review and process the audit. When the completion date and process dates overlapped quarters, the audit was never reported on the 581 as the 581 had previously ran. This was corrected on 7/28/17 and going forward it should not be an issue. As a result, the numbers on the 581 were understated for the 4th QTR 2016 through the 3rd QTR of 2017.
"

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.
"RI has been working on the consortium project and as a result was unable to run data validation extracts as much as it would have liked due to limited resources. RI has since trained the TPS supervisor in the data validation process so that next year RI will be able to run these extracts on a more frequent basis as a result RI should have less failure and be able to submit passing populations.
RI failed population 1 because RI had reimbursable accounts that were active that had more than 8 quarters of zero. Reimbursable accounts will be reviewed quarterly to determine if they have more than 8 quarters of zero's and will be terminated if necessary. As a result, RI will pass population 1 the next time the extract file is run through the sun system.
RI failed tax population 3 because the file extract was pulling in the wrong dates for successor accounts that had a change in liability date after the fact. RI will review the extract file and errors that were created as a result of Data Validation to determine what adjustment need to be made to the extract file. Once the adjustments are made RI will rerun the DV extract file through the sun system to verify that the changes made have

addressed the issue that caused RI to fail Population 3
Population 4 for RI is still a work in progress. RI has yet to create an extract file for this population that is working correctly. This population extract is very complicated. RI while working on the consortium project had stopped working on updating the program for population 4 as RI was designing a new program for the consortium. Now that new staff has been trained RI will review the Data Validation(DV) requirements and continue to make modifications to the extract file as required per DV requirements for the current RI tax system. RI will also review the current 581 programming for accounts receivable to verify that it to is programmed correctly per 581 requirements. Once both files have been reviewed and changes are addressed if needed RI will rerun the extract file through the sun system. If there are any errors RI will continue to address them until Population 4 passes the 2% Data Validation requirements and sample.
Population 5 failed because one audit was coded as a change audit in our system in error and when the data validation software ran is was picked up as a no change audit. Do to this one error it caused us to fail population 5. A clerical error created population to fail as a result staff will be retrained on entering audits into the RI tax system
Module 3 was not submitted and validated in time for the deadline but has been since been submitted and finalized.
Module 4 failed because in 2017 RI had a changeover in staff in the audit entry process. The new staff member was entering the completion date as the date the auditor finalized the audit but did not account for the time it took the supervisor to review and process the audit. When the completion date and process dates overlapped quarters, the audit was never reported on the 581 as the 581 had previously ran. This was corrected on 7/28/17 and going forward it should not be an issue. As a result, the numbers on the 581 were understated for the 4th QTR 2016 through the 3rd QTR of 2017.
"

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.
Last year RI had a plan in place for population 4 and was unsuccessful accomplishing this plan. This was directly related to the fact that the RI resources allocated to the Consortium project are the same resources needed for Data Validation from both the business and IT departments. Additional business resources have been trained for Data Validation that are not fully allocated to the consortium project. As a result, RI is more confident that they will have the time to address Population 4.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance
goals.
RI will once a quarter allocate time for data validation to make sure that the milestones below will be met or adjusted if needed on a regular basis.

5. UI Program Integrity Action Plan (UI IAP)

The UI IAP outlines the strategies the State will undertake during the planning period regarding the prevention reduction and recovery of UI improper payments.

Rhode Island continues to operate an extensive integrity program and will continue to improve our efforts. Director Jenson strongly feels that integrity is a critical part of the Departments mission and seeks to continue the effective operation of all prevention, detection and recovery tools. Accountable Agency Official: Fernanda Casimiro, Assistant Director

During FFY 2018, Rhode Island was successful in the efforts outlined in the Program Integrity Action Plan. Currently, Rhode Island has begun an effort to restructure the Benefit Payment Control (BPC) Unit as recommended by the Integrity Center following their on-site State Services visit. The BPC Unit is now led by a Principal Manager who is supported by an Employment & Training Manager who oversees the Overpayment Unit. At a functional level, the BPC Unit maintains three Fraud Investigators who handle criminal fraud investigation in the Fraud Unit, as well as, three Benefit Claims Specialists (BCS) and three Sr. Employment & Training Interviewers who make up the Overpayment Unit. The Fraud Unit has been reduced in size by one investigator over the prior year. Due to budget constraints, the investigator position will not be filled. During FFY 2018 the Fraud Unit investigated 205 cases of potential fraud and identified $602,280 in fraudulent improper payments. In addition, Fraud Unit staff reviewed 108 claims suspected to be identity theft and identified 104 attempted fraudulent claim attempts preventing $616,013 in improper payments.

Moving forward into FFY 2020, Rhode Island will be taking additional steps to improve the processes which are used to prevent, detect, investigate and recover improper payments. Rhode Island has begun the process to participate in the Integrity Data Hub that was developed by the Integrity Center. Rhode Island executed the participation agreement and has begun to upload records. Automation of the upload and crossmatch processes with the Integrity Data Hub will be a high priority moving forward. In addition, Rhode Island has begun the process of reviewing and updating all policies in the Fraud Unit. The goal of this review is to ensure that the procedures are current and maximize efficiency in the Fraud Unit to offset the decreased staffing levels.

In addition to the structure and procedure changes, the BPC Unit is making efforts to improve the detection of improperly paid benefits. These efforts include increasing the number of cases each day for Overpayment Unit BCS staff. By increasing the number of cases addressed each day, it is anticipated that performance in the area of overpayment detection will be increased. The Department will continue to make additional efforts to reduce the number and amount of improper payments throughout the year. We anticipate that the changes made during the prior year, as well as, the new structure, procedures and increased case load that will be implemented during the year will result in a measurable impact in the form of reduced improper payments.

6. Organizational Chart

The organization chart must conform to the requirement for delivery of service through public employment offices, or such other designated providers as the Secretary may authorize; show the State's configuration from the Governor of the State down to the point of Employment Service and UI customer service delivery; and provide sufficient detail to show each organizational unit involved and the title of the unit manager.

Please see appendix.

7. SQSP Signature Page

The State administrator must sign and date the SQSP Signature Page. By signing the Signature Page, the State administrator certifies that the State will comply with all the assurances and activities contained in the SQSP guidelines.

Though a State needs to submit the complete SQSP package on a 2-year cycle, there are certain documents contained in the SQSP package which are required to be submitted by States annually as part of the off-year submission. The documents which are required to be submitted annually are considered a modification to the complete SQSP submitted the previous year. Since funds for State UI operations are appropriated each year, each State is required to annually submit the transmittal letter, budget worksheets, organizational chart and the signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs.

Since the UI program is a required one-stop partner, States have the option of including UI in the Combined State Plan authorized by WIOA sec. 103.

U.S. DEPARTMENT OF LABOR Employment and Training Administration

FEDERAL FISCAL YEAR 2020

STATE Rhode Island

UNEMPLOYMENT INSURANCE

STATE QUALITY SERVICE PLAN

SIGNATURE PAGE

This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the Department of Labor, Employment and Training Administration, and Rhode Island Department of Labor and Training (NAME OF STATE AGENCY).

The Unemployment Insurance SQSP is part of the State's overall operating plan and, during this Federal fiscal year, the State agency will adhere to and carry out the standards set forth in Federal UI Law as interpreted by the DOL, and adhere to the Federal requirements related to the use of granted funds.

All work performed under this agreement will be in accordance with the assurances and descriptions of activities as identified in the SQSP Handbook and will be subject to its terms.

TYPED NAME AND TITLE: Scott R. Jensen, Director

SIGNATURE: Scott R. Jensen

DATE: 8/28/19

b. Requirements for States electing to include UI in the Combined State Plan

States that elect to include UI in the Combined State Plan must:

1. Submit an SQSP in the following manner depending on their timing in the SQSP cycle:

A. If a State is in the first year of their 2-year cycle, the State is required to submit the most recently approved complete SQSP package. A complete SQSP package will include the Transmittal Letter, Budget Worksheets/Forms, State Plan Narrative, CAPs (including the milestones and the completion date for each milestone), the UI IAP, Organizational Chart, and the SQSP Signature Page. One of the key goals for the UI program is to ensure that claimants are able to successfully return to work. As such, the SQSP State Plan Narrative must provide a discussion of the plan coordination with other WIOA Combined Plan programs to ensure a coordinated effort and integrated service delivery.

B. If a State is in the second year of the 2-year cycle, the State is required to submit the most recently approved complete SQSP package with a modification that must include the Transmittal Letter, Budget Worksheets/Forms, Organizational Chart, and the SQSP Signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

Please see appendix.

2. Submit the required off-year SQSP components as a modification to the Combined State Plan on the same cycle as the regular SQSP process which must be approved by September 30th each year

Please see appendix.

Senior Community Service Employment Program (SCSEP)

(OMB Control No. 1205-0040)

a. Economic Projections and Impact

1. Discuss long-term projections for jobs in industries and occupations in the State that may provide employment opportunities for older workers. (20 CFR 641.302(d)) (May alternatively be discussed in the economic analysis section of strategic 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.

Rhode Island Industry Projections by Economic Sector

Rhode Island Industry Projections by Economic Sector				
2016 - 2026				
	2016	**2026**		
	Projected	**Projected**	**Numeric**	**Percent**
	Employment	**Employment**	**Change**	**Change**
Statewide	520,251	550,715	30,464	5.90
Health Care & Social Assistance	82,389	86,500	4111	5.00
Accommodation & Food Services	48,204	52,761	4557	9.50
Retail Trade 3 48,190	48,190	50,653	2,463	5.10
Educational Services	44,329	45,550	1,221	2.80
Manufacturing	40,420	42,510	2,090	5.20
Government	31,431	32,028	597	1.90
Administrative & Waste Services	27,873	30,301	2,428	8.70
Finance & Insurance	26,572	28,120	1,548	5.80
Construction	18,134	20,401	2267	12.50
Other Services (except Government)	17,951	18,751	800	4.50
Wholesale Trade	16,484	16,893	409	2.50
Management of Companies & Enterprises	13,378	14,213	835	6.20
Transportation & Warehousing	9,939	10,748	809	8.10
Arts, Entertainment, & Recreation	9,311	10,055	744	8.00
Real Estate & Rental & Leasing	6,108	6,534	426	7.00
Information	6,114	6,507	393	6.40
Utilities	1,081	1,087	6	0.60

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.

	Employment						
	2016	**2026**	**Change**	**Exits**	**Transfers**	**Growth**	**Total**
Statewide, All Occupations	520,251	550,715	5.9	250,610	329,654	30,464	610,728
Management Occupations	24,445	26,490	8.4	6,541	13,101	2,045	21,687
Business & Financial Operations Occupations	28,014	30,182	7.7	8,496	16,709	2,168	27,373
Computer & Mathematical Occupations	14,851	16,671	12.3	2,670	7,519	1,820	12,009
Architecture & Engineering Occupations	7,871	8,696	10.5	2,040	3,740	825	6,605
Life, Physical, & Social Science Occupations	2,992	3,222	7.7	776	1,742	230	2,748
Community & Social Service Occupations	9,805	10,396	6.0	3,988	6,735	591	11,314
Legal Occupations	6,292	6,714	6.7	1,574	2,196	422	4,192
Education, Training, & Library Occupations	33,122	34,326	3.6	15,131	14,161	1,204	30,496
Arts, Design, Entertainment, Sports, & Media Occupations	8,639	8,967	3.8	3,610	5,134	328	9,072
Healthcare Practitioners & Technical Occupations	36,067	37,908	5.1	9,397	8,710	1,841	19,948
Healthcare Support Occupations	21,541	23,266	8.0	12,810	12,050	1,725	26,585
Protective Service Occupations	12,471	12,735	2.1	6,945	7,041	264	14,250
Food Preparation & Serving Related Occupations	50,887	55,424	8.9	40,103	50,495	4,537	1 95,135
Building & Grounds Cleaning & Maintenance Occupations	19,543	20,953	7.2	11,823	13,015	1,410	26,248

Personal Care & Service Occupations	17,951	19,641	9.4	13,585	12,698	1,690	27,973
Sales & Related Occupations	50,766	53,106	4.6	29,739	39,641	2,340	3 71,720
Office & Administrative Support Occupations	76,461	76,008	-0.6	39,119	45,790	-453	2 84,456
Farming, Fishing, & Forestry Occupations	1,245	1,305	4.8	463	1,328	60	1,851
Construction & Extraction Occupations	22,148	25,196	13.8	8,292	15,142	3,048	26,482
Installation, Maintenance, & Repair Occupations	16,927	18,183	7.4	6,102	10,387	1,256	17,745
Production Occupations	31,365	32,727	4.3	13,674	22,825	1,362	37,861
Transportation & Material Moving Occupations	26,848	28,599	6.5	13,732	19,495	1,751	34,978

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

Rhode Island High Demand Occupations by Annual Openings 2016 - 2026			
Retail Salespersons	21,904	Maids & Housekeeping Cleaners	5,301
Waiters & Waitresses	20,839	Helpers--Production Workers	5,259
Combined Food Preparation & Serving Workers (Including Fast Food)	20,621	First-Line Supervisors: Food Preparation & Serving Workers	5,198
Cashiers	19,450	Home Health Aides	5,193
Customer Service Representatives	13,077	Light Truck or Delivery Services Drivers	5,107
Nursing Assistants	12,352	Accountants & Auditors	5,081
Office Clerks, General	10,934	Receptionists & Information Clerks	5,054
Janitors & Cleaners	10,346	Childcare Workers	4,669
Stock Clerks & Order Fillers	9,947	Maintenance & Repair Workers, General	4,520
Laborers & Freight, Stock, & Material Movers, Hand	9,298	Construction Laborers	4,363

Food Preparation Workers	8,277	Heavy & Tractor-Trailer Truck Drivers	4,244
Counter Attendants, Cafeteria, Concession, & Coffee Shop	8,244	Security Guards	3,973
Cooks, Restaurant	7,882	Dishwashers	3,419
Landscaping & Groundskeeping Workers	7,691	Management Analysts	3,287
Registered Nurses	7,409	Hairdressers, Hairstylists, & Cosmetologists	3,286
Bookkeeping, Accounting, & Auditing Clerks	6,807	Hosts & Hostesses, Restaurant, Lounge, & Coffee Shop	3,262
Personal Care Aides	6,694	Dining Room & Cafeteria Attendants & Bartender Helpers	3,218
First-Line Supervisors of Retail Sales Workers	6,644	Social & Human Service Assistants	3,189
Bartenders	6,270	Substitute Teachers	3,135
General & Operations Managers	6,232	Electricians	3,034
Secretaries & Administrative Assistants (Except Legal, Medical, & Executive)	6,099	Medical Assistants	3,016
Carpenters	5,946	Team Assemblers	2,960
Sales Representatives, Wholesale & Manufacturing (Except Technical & Scientific Products)	5,898	Medical Secretaries	2,916
First-Line Supervisors: Office & Administrative Support Workers	5,652	First-Line Supervisors of Production & Operating Workers	2,833
Teacher Assistants	5,531	Automotive Service Technicians & Mechanics	2,770

Opportunities for Older Workers

Rhode Island businesses are increasingly recognizing the value of older workers and the cost savings that can be attributed to employing people with many years of work experience. Rhode Island's largest and/or growing industries provide a number of opportunities for employers requiring the expertise and experience that older workers can provide.

Education Services and Healthcare and Social Assistance are two such areas where the need for experienced, knowledgeable, and talented older workers is expected to grow, even in light of the Covid-19 outbreak. Teachers and healthcare workers at all levels are needed to

meet this demand. Rhode Island's large tourism and hospitality industries also are areas that may provide employment opportunities for older workers. For older workers with business, office and professional experience/background, occupations such as Bookkeeping, Accounting, & Auditing Clerks, as well as Secretaries & Administrative Assistants, represent additional opportunities for employment.

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.

3. Discuss current and projected employment opportunities in the State (such as by providing information available under §15 of the Wagner-Peyser Act (29 U.S.C. 491-2) by occupation), and the types of skills possessed by eligible individuals. (20 CFR 641.325(c))

Statewide Occupations with the Highest Projected Openings 2016-2026, with Education and Training Requirement

CODE	Title	Total Openings	Typical Education	Job Training
41-2031	Retail Salespersons	21,904	No formal educational credential	Short-term on-the-job training
35-3031	Waiters and Waitresses	20,839	No formal educational credential	Short-term on-the-job training
35-3021	Combined Food Preparation and Serving Workers, Including Fast Food	20,621	No formal educational credential	Short-term on-the-job training

CODE	Title	Total Openings	Typical Education	Job Training
41-2011	Cashiers	19,450	No formal educational credential	Short-term on-the-job training
43-4051	Customer Service Representatives	13,077	High school diploma or equivalent	Short-term on-the-job training
31-1014	Nursing Assistants	12,352	Postsecondary non-degree award	None
43-9061	Office Clerks, General	10,934	High school diploma or equivalent	Short-term on-the-job training
37-2011	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	10,346	No formal educational credential	Short-term on-the-job training
43-5081	Stock Clerks and Order Fillers	9,947	High school diploma or equivalent	Short-term on-the-job training
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	9,298	No formal educational credential	Short-term on-the-job training

Statewide Vocational Training Occupations with the Highest Projected Number of Openings 2016-2026

CODE	Title	Total Openings	Typical Education	Job Training
35-2014	Cooks, Restaurant	7,882	No formal educational credential	Moderate-term on-the-job training
43-3031	Bookkeeping, Accounting, and Auditing Clerks	6,807	Some college, no degree	Moderate-term on-the-job training
41-4012	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	5,898	High school diploma or equivalent	Moderate-term on-the-job training

CODE	Title	Total Openings	Typical Education	Job Training
49-9071	Maintenance and Repair Workers, General	4,520	High school diploma or equivalent	Moderate-term on-the-job training
41-3099	Sales Representatives, Services, All Other	3,624	High school diploma or equivalent	Moderate-term on-the-job training
51-2092	Team Assemblers	2,960	High school diploma or equivalent	Moderate-term on-the-job training
43-6013	Medical Secretaries	2,916	High school diploma or equivalent	Moderate-term on-the-job training
51-4121	Welders, Cutters, Solderers, and Brazers	2,477	High school diploma or equivalent	Moderate-term on-the-job training
41-3021	Insurance Sales Agents	1,989	High school diploma or equivalent	Moderate-term on-the-job training
43-3021	Billing and Posting Clerks	1,946	High school diploma or equivalent	Moderate-term on-the-job training

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.

Education Level	2016	2026	Exits	Openings Due To Transfers	Growth	Total Openings
Doctoral or professional degree	19,483	20,335	4,552	4,601	852	10,005
Master's degree	11,028	11,752	3,698	5,366	724	9,788
Bachelor's degree	108,530	116,777	32,824	54,379	8,247	95,450
Associate degree	12,824	13,606	4,228	6,265	782	11,275
Postsecondary non-degree award	35,016	36,893	16,844	18,795	1,877	37,516
Some college, no degree	13,746	13,858	7,376	6,645	112	14,133
High school diploma or equivalent	199,190	208,902	95,285	129,581	9,712	234,578
No formal educational credential	120,434	128,592	85,803	104,022	8,158	197,983

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	2016	2026	Exits	Openings Due to Transfers	Growth	Total Openings
Grand Total	520,251	550,715	250,610	329,654	30,464	610,728
5 years or more	19,722	21,573	5,394	11,229	1,851	18,474
Less than 5 years	52,906	56,087	21,000	32,578	3,181	56,759
None	447,623	473,055	224,216	285,847	25,432	535,495

Occupational distribution of the typical on-the-job training needed to attain competency for Rhode Island occupations.

	Employment					
Typical Education Needed For Job	2016	2026	Exits	Openings Due to Transfers	Growth	Total Openings
Internship/residency	10,116	10,372	2,232	2,931	256	5,419
Apprenticeship	10,517	12,483	3,975	7,255	1,966	13,196
Long-term on-the-job training	17,019	17,862	6,118	9,462	843	16,423
Moderate-term on-the-job training	82,822	86,354	34,338	52,304	3,532	90,174
Short-term on-the-job training	205,229	216,128	134,171	159,459	10,899	304,529
None	194,548	207,516	69,776	98,243	12,968	180,987

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.

D. Planned actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))

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.

E. Actions to ensure that SCSEP is an active partner in the one-stop delivery system and the steps the State will take to encourage and improve coordination with the one-stop delivery system. (20 CFR 641.335)

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.

F. Efforts to work with local economic development offices in rural locations.

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.

2. The State's long-term strategy for engaging employers to develop and promote opportunities for the placement of SCSEP participants in unsubsidized employment. (20 CFR 641.302(e)) (May alternatively be discussed in the State strategies section of strategic plan.)

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.

3. The State's long-term strategy for serving minority older individuals under SCSEP. (20 CFR 641.302 (c))

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.

4. A list of community services that are needed and the places where these services are most needed. Specifically, the plan must address the needs and location of those individuals most in need of community services and the groups working to meet their needs. (20 CFR 641.330)

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) Communities in Need:

The following list based on the most data available identifies those localities for which projects of the type authorized by Title V are most needed (20 CFR 641.325 (d).) These areas are where the both the most recent annualized unemployment rate and poverty rate exceeded the state average.

City/Town	Unemployment (2018)	Poverty Rate (2016)
Woonsocket	5.4%	24.4%
Providence	5.1%	26.9%
Central Falls	4.9%	30.7%
Pawtucket	4.6%	20.0%

SCSEP will focus efforts in the areas of greatest needs based on the unemployment rate and incidences of poverty. To better serve individuals with a priority for service, the Department of Labor and Training works closely with the Department of Human Services, the Department of Behavioral Health, Development Disabilities and Hospitals, and the Office of Healthy Aging (formerly the Division of Elderly Affairs).

2) 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.

3) 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 CFR 641.302(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 (5) slots in Bristol County; five (5) slots in Kent County; and twenty-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, Glocester, 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.

The 21 slots in Providence County is down from previous program years of PY18 at 22 slots and PY17 at 23 slots. This change was due to the increase of minimum wage in RI. Positions in the two remaining counties were unchanged from the previous year.

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.

5. The ratio of eligible individuals in each service area to the total eligible population in the State. (20 CFR 641.325(a))

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.

6. The relative distribution of eligible individuals who:

A. Reside in urban and rural areas within the State

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%.

B. Have the greatest economic need

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.

C. Are minorities

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 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.

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.

Performance Indicator Appendix

All WIOA Core Programs

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

All WIOA Core Programs

Performance Indicators	**PY 2020 Expected Level**	**PY 2020 Negotiated Level**	**PY 2021 Expected Level**	**PY 2021 Negotiated Level**
Effectiveness in Serving Employers	Not Applicable[1]	Not Applicable[1]	Not Applicable[1]	Not Applicable[1]

[1] *"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.*

Additional Indicators of Performance

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Additional Indicators of Performance
N/A

Other Appendices

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RHODE
STATE of
ISLAND
HOPE