

# STATE OF MONTANA WIOA COMBINED STATE PLAN

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### I. WIOA STATE PLAN TYPE and EXECUTIVE SUMMARY

- (a) **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 Program, Dislocated Worker Program, Youth Program, Wagner-Peyser (WP) Act Program, Adult Education and Family Literacy Act Program, and Vocational Rehabilitation Program as well as one or more of the optional Combined State Plan partner programs identified below.
    - Indicate which Combined State Plan partner program(s) the State is electing to include in the plan.
      - Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act (Perkins V) (20 U.S.C. 2301 et seq.)
      - Temporary Assistance for Needy Families Program (42 U.S.C. 601 et seq.)
      - 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.))

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- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant Program (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))
- Reintegration of Ex-Offenders Program (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))]

The State of Montana is submitting a combined plan with the following programs:

- WIOA Title I: Adult, Dislocated Worker, and Youth;
- WIOA Title II: Adult Education and Family Literacy Act Program;
- WIOA Title III: Wagner-Peyser Act Program;
- WIOA Title IV: Vocational Rehabilitation Program (VRBS);
- Trade Adjustment Assistance for Workers Programs (TAA);
- Jobs for Veterans State Grants Program (JVSG); and
- Senior Community Service Employment Program (SCSEP)

**(b) PLAN INTRODUCTION OR EXECUTIVE SUMMARY:** The Unified or Combined State Plan may include an introduction or executive summary. This element is optional.

The impact that the COVID-19 pandemic had on strategic planning and achievement, program operations, training, the labor market, the future of work, how society views and values education, and related issues such as childcare, housing, and customer behaviors cannot be over-exaggerated. In short, the pandemic changed how we think of and approach workforce development.

Montana is hopeful that WIOA reauthorization will help states better adjust to new and emerging workforce realities. As a largely place-based piece of legislation built on the principles of physical integration and service, there is much opportunity to revisit the WIOA model to allow for more flexibility in who the public workforce system serves and how.

Montana's economy is growing with a need of qualified workers. By December 2021, Montana has reported the state's lowest unemployment rate on record, with all 56 counties reporting a below 5% unemployment rate. While the economy is on the move and unemployment is low, there are coming challenges ahead where our efforts will focus. Montana's economy has long been dependent on natural resources. Although this will continue, the state is diversifying industries, including information technology, biomedical manufacturing, advanced manufacturing, and agribusiness entrepreneurship. Through existing and emerging professions, industries continue to explore education and stackable industry certificates and micro-credentials achieved in

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the workplace, in addition to formal apprenticeships with secondary and post-secondary institutions, the Department of Labor & Industry, and the Department of Commerce. Additionally, nearly 20% of Montana's workforce will retire in the next ten years, in a state with an already high retiree rate. A focus to strategically tackle this challenge will continue as well.

Montana's projected worker shortage and the need to train workers for the career opportunities that exist in the state present both challenges and opportunities for collaboration and partnerships necessary to overcome the workforce hurdles that exist throughout the state. The Workforce Innovation and Opportunity Act (WIOA) and Perkins V challenge the state to combine resources, create partnerships, and look to Labor Market Information (LMI) and industry research to develop education and training programs that meet the expectations of the future economy. Montana's Department of Labor & Industry, University System, and K-12 education system have established partnerships and are creating a foundation for implementing Perkins V and growing successful strategies established under WIOA.

The WIOA Combined State Plan builds from the groundwork currently in place and aims to further develop a talent development system that enhances training, education, and services available to Montana's current and future workforce. Over the coming years, the state of Montana will continue aligning systems and programs to meet the strategic and programmatic goals outlined in this plan. The strategic goals were developed through collaboration with partners and stakeholders and build on successes to overcome obstacles.

This WIOA Combined State Plan was jointly developed by one state team, guided by leadership from all of Montana's combined state plan programs. The strategic and operational planning elements were written with input from the state's team, while program-specific requirements were written by each program and shared for vetting with the state team.

## 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.

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### (1) 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.

Montana's economy is struggling to find sufficient workers to fuel the rapid economic growth experienced in recent years. In 2020, the pandemic battered Montana's economy with heavy job losses and record high unemployment. Then as business restrictions were lifted, consumer demand surged, fueled by higher income levels, economic stimulus, and the release of pent-up demand. In response to Montana's businesses struggling to hire enough workers to meet customer needs, the governor ended the pandemic-related unemployment insurance programs early to increase work incentives; and by mid-2021, the state exceeded the pre-pandemic employment peak for both output and employment, with rapid growth continuing for the rest of the year. By December 2021, Montana's unemployment rate hit an all-time low with less than 14,000 people unemployed across the full state. Montana is experiencing worker shortages in all industries and regions, with every county in the state posting unemployment rates below 5%. Businesses have been clamoring for workers, with temporary business closures due to insufficient staff becoming commonplace. Finding and training workers to fill openings in Montana's economy has never been more critical.

The surging demand for workers is also occurring during a time when the labor market has been constrained by population demographics, with the large baby boomer generation moving into retirement without enough younger workers to replace them. Every age group has recovered their pre-pandemic labor force participation level except younger workers under 25. However, the state's overall labor force participation rate remains a full percentage point below the pre-pandemic level because of the number of people who have moved into the lower-participation retirement years. This has led to an intentional focus on work-based learning opportunities for high school and post-secondary students by utilizing flexibilities that local school boards have to declare course equivalency for students training at jobs sites for in-demand industries such as healthcare, construction, manufacturing, agriculture, and hospitality.

These demographic changes and labor force size have been the focus of extensive predictions, informational outreach, and workforce development efforts for over ten years. When our private sector partners started to feel the strain of finding well-trained workers, the Department was already a step ahead, leading the way with tested programs to assist. Now, the Department has effective partnerships with private industry and education sector partners, helping the state achieve its full workforce potential. These partnerships have focused on ensuring our education systems are producing job-ready workers at all education levels and in all occupations and reducing training times to put workers in jobs more quickly. Practical work experience has been integrated into work-based learning experiences as early as elementary school, with structured personalized learning opportunities taking full advantage of the stackable

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credentials and certificates available to high school students within the industry classroom and formalized internships and apprenticeships gaining popularity among both learners and employers.

While the attention to work-based learning and industry partnerships has long been a focus of workforce development activities, the governor has reinvigorated focus to repairing the disconnect between employers and educators, creating sustainable public-private partnerships to create direct to industry workforce pipelines where workers are needed the most. The governor's Build Montana initiative recognizes that career and technical education (CTE) personalized to each student provides not only the technical skills for occupational advancement but also a vision for the student(s) of what a successful career in industry can mean for the student. Local school boards of trustees in Montana have broad powers to declare flexible course equivalencies and free student seat time in favor of work-based learning opportunities leading to industry credentialed learning. The Accelerate Montana partnership builds upon this pipeline by helping Montanans access short term training programs that provide them with the skills needed to fill the significant workforce vacancies and skills gaps that employers are experiencing throughout the State. Accelerate Montana is partnering with the Montana University Institutions, private colleges, tribal colleges, high schools, private business, and local economic development organizations to deliver and expand short-term training opportunities statewide. These programs will allow trainees to obtain with stackable credentials that will give them the skills for a new career – with a specific focus on Montana's key industries with a need for skilled workers – like construction, health care, manufacturing, and IT.

### **THIS INCLUDES:**

- (i) EXISTING DEMAND INDUSTRY SECTORS AND OCCUPATIONS.** Provide an analysis of the industries and occupations for which there is existing demand.

With a growing retirement population, healthcare, leisure activities, and construction are expected to be the fastest growing in Montana through 2028. These jobs are concentrated in the more populated regions in Montana, with construction workers most needed in the rapidly growing western half of the state. Utility employment is expected to decline in the next ten years, largely due to the closure of several coal-fired power plants in Eastern Montana and continued low natural gas prices providing a cheaper fuel source than oil or coal.

However, with roughly 1/5th of the state's workforce expected to retire in the next ten years, nearly all industries and occupations have unmet worker demand. The demand from employers for worker training and assistance with planning has never been higher. Therefore, prioritization is often done by where public-sector involvement provides the most value. For example, while occupations related to food preparation, sales, and office and administrative support are projected to have the most job openings through 2028, these jobs often can be filled with workers with education and training provided through structured work-based learning opportunities during a student's secondary education, freeing limited state agency workforce development resources to focus on higher-skill

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and higher-paying occupations. Occupations projected to have a large amount of job openings include a variety of healthcare occupations (registered nurses, nursing assistants, licensed practical and licensed vocational nurses, medical assistants, and dental assistants), several business-related occupations (accountants and auditors, bookkeeping clerks, and business operations specialists), teachers, computer user support specialists, social workers, heavy and tractor-trailer truck drivers, construction workers, and automotive service technicians and mechanics.

**(i) EMERGING DEMAND INDUSTRY SECTORS AND OCCUPATIONS.** Provide an analysis of the industries and occupations for which demand is emerging.

Emerging industries include information technology, biomedical manufacturing, and phototonic businesses. All of these emerging areas stress on-the-job training, which can be met through high school work-based learning and formal apprenticeship training or internships for students and adults. Montana's Registered Apprenticeship Program offers programs in a variety of these fields.

Specific occupations related to the high-tech industry include computer user support specialists, application software developers, electrical and electromechanical assemblers, software developers, management analysts, biological technicians, electrical and electronics engineering technicians, electrical engineers, microbiologists, and other occupations. In addition, the growing high-tech industry requires several support occupations that are common to all industries, such as customer service representatives, sales representatives, office clerks, sales representatives, and market research analysts.

**(ii) 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.

Throughout the economy, employers need workers to be well-trained in technical and soft skills prior to hire and are requesting more work-based training to guide student learning through work experience during high school and post-secondary years.

Roughly 20% of Montana's current workforce is expected to retire in the next ten years, keeping work-based experience at the top of the list for in-demand skills and abilities. Overall, the most common skill needed now and in future Montana jobs is active listening, and the most common soft skill needed is coordination. Computer skills are also expected to increase across the economy in future years.

Within the trades occupations, employers are seeking workers with prior hands-on training. Many mechanics, welders, and other positions require employer-specific credentials that can be obtained through the employer in conjunction with classroom learning.

Healthcare is Montana's largest private employing industry and requires large numbers of workers each year to fill openings. Healthcare jobs require varying levels of education

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and training. Certified nursing assistants (CNA), certified medical assistants (CMA), pharmacy technicians, home health and personal care aides, and environmental technicians can be trained using personalized career and technical education and work-based opportunities at the high school level.

The professional services industry is also a fast-growing industry in Montana and is expected to maintain this pace in the next ten years. Jobs in the professional services industry also require varying levels of formal training and education, creating job demand at all education levels in Montana.

- (A) WORKFORCE ANALYSIS.** The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in Section 3 of WIOA. This population must include individuals with disabilities among other groups in the State and across regions identified by the state. This includes:
- (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) SKILLS GAPS.** Describe apparent skill gaps.

Growth in Montana's labor force has been slow for the last decade due to the retirement of the baby boomer population without sufficient younger workers to replace them. Employment needs pre-pandemic were largely met with net in-migration of roughly 8,000 per year and small increases in labor force participation rates. Labor force participation rates were negatively impacted by the pandemic, with a drop in Montana's labor force participation rate of over 1%. Every age group has recovered their pre-pandemic labor force participation level except younger workers under 25. However, the state's overall labor force participation rate remains a full percentage point below the pre-pandemic level because of the number of people who have moved into the lower-participation retirement years. The depressed labor force participation rate is therefore expected to remain lower than the pre-pandemic timeframe.<sup>1</sup>

The two remaining groups where labor force participation levels could be improved are younger workers under 25, which are often the last to recover from recessions given the lower education and experience, and men. The labor force participation rate for Montana men has been slowly falling over the last 30 years but has made a sharp decline post-pandemic among men aged 25 to 54 and among parents. In contrast, the labor force participation rate of Montana women has increased in the post-pandemic

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<sup>1</sup> Wagner, Barbara. "Worker Shortages" Presentation to Montana Financial Modernization & Risk Analysis Study Legislative Committee, Montana Department of Labor & Industry. Helena Montana, Jan. 2022. Available at <https://leg.mt.gov/lfd/financial-modernization-risk-analysis-study-committee/>.



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timeframe across all age groups and among both parents and non-parents. The causes of these gender differences are not clear.<sup>2</sup>

Montana's overall labor force participation rate is expected to continue to decline over the next ten years due to continued retirements of the baby boomer population. The labor force is expected to continue to grow slowly at about 3,600 people per year, which includes the roughly 8,000 in-migrants into Montana's labor force each year. At this pace, unemployment rates will continue to be quite low and job growth will be restricted. Worker shortages are expected to ease after 2025.<sup>3</sup>

### INDIVIDUALS WITH BARRIERS:

Individuals with barriers to employment include displaced homemakers; 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, individuals with disabilities, 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.

Low-income Montanans were hard hit by the pandemic recession, with workers earning less than median wages comprising nearly 75% of those receiving unemployment benefits in 2020. However, the rapid recovery and worker shortage has resulted in increased wages among low-wage jobs, particularly in the leisure activities industry. Stronger wages will draw more of these workers into the labor market, but more work must be done to improve the skill levels of these workers to raise them up the career ladder.

Native Americans are Montana's largest minority population, with those claiming American Indian ancestry alone or with another race comprising 7% of Montana's labor force. Montana's Native population has similar labor force participation rates as the statewide average. However, the unemployment rate of Montana's Native American population is higher than the state, at 11.6% compared to 4.1% in 2019.<sup>4</sup>

Roughly 30,000 Montana workers have a disability, with the most common types of disability among workers being a cognitive difficulty. Another 2,300 disabled Montanans are unemployed, at an unemployment rate for disabled Montanans of 7%.<sup>5</sup>

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<sup>2</sup> Wagner, Barbara. "Worker Shortages" Presentation to Montana Financial Modernization & Risk Analysis Study Legislative Committee, Montana Department of Labor & Industry. Helena Montana, Jan. 2022. Available at <https://leg.mt.gov/lfd/financial-modernization-risk-analysis-study-committee/>.

<sup>3</sup> Montana Department of Labor & Industry, Labor Market Forecasts, 2018.

<sup>4</sup> U.S. Census, 2019 American Community Survey 1-Year Estimates for Montana, Table S0201.

<sup>5</sup> US Census, 2019 American Community Survey 1-Year Estimates for Montana, Table B18120.

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Finally, roughly 32,000 Montanans with a disability are not in the labor force, representing a sizeable untapped labor pool. The most common disability among those not in the labor force is an ambulatory difficulty.

There are 44,400 veterans between the ages of 16 to 65 in Montana, with 77% of them in the labor force (roughly equal to the participation rates among the nonveteran population). Unemployment rates for veterans are not statistically different than nonveterans.<sup>6</sup>

#### CHARACTERISTICS OF THE UNEMPLOYED

Montana's unemployment rates hit an all-time low in 2021, leaving less than 14,000 individuals unemployed in the state and fewer than 8,800 claiming unemployment insurance. Unemployment insurance claimants at the end of 2021 tended to be male, between the ages of 25 to 54 (67%), male (76%), white (88%), and having a high school or less as their top educational achievement (roughly 60%). Workers with low education levels are more likely to be among unemployment insurance claimants.<sup>7</sup>

#### CHARACTERISTICS OF THOSE NOT IN THE LABOR FORCE:

Over 60% of Montana's non-working population over 16 are retired. Other common reasons are having a disability or illness (12.5% of nonworking Montanans), taking care of family (10%), or attending school or other training (13%). Only 4% provide other reasons for not being in the labor force, including mental illness, lack of transportation, previous felony or misdemeanor conviction, lack of housing, domestic violence, or lack of economic opportunity.<sup>8</sup>

#### LABOR MARKET TRENDS:

More Montanans are working than ever before, more Montanans are in the labor force than ever before, and the unemployment rate has never been this low. Employers in all areas of the state and in every industry and occupation are having difficulty finding sufficient workers, with shortages the most acute in low-wage occupations where recruitment from a lower-wage job is not possible. Given the large labor demands from healthcare and construction, along with the need for medium-term technical and practical training in these careers, workforce training efforts from Montana's workforce and education organizations often focus on training workers for jobs in healthcare and construction.

#### EDUCATION AND SKILL LEVELS OF THE WORKFORCE:

Montana's workforce is well-educated, having the second highest share of the population with a high school diploma or equivalency among states in 2019.<sup>9</sup> Roughly 65% of Montana's population has some type of post-secondary education. However,

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<sup>6</sup> US Census, 2019 American Community Survey 1-Year Estimates for Montana, Table C21005.

<sup>7</sup> Montana Department of Labor & Industry Job Tracking Dashboard, Unemployment Insurance tab, at [lmi.mt.gov/home/job-tracking](https://lmi.mt.gov/home/job-tracking). Accessed Feb. 2022.

<sup>8</sup> Montana Department of Labor & Industry Job Tracking Dashboard, Finding Workers tab, at [lmi.mt.gov/home/job-tracking](https://lmi.mt.gov/home/job-tracking). Accessed Feb 2022.

<sup>9</sup> U.S. Census. 2019 American Community Survey 1-year estimates, table S1501

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only about 43% of Montana's population have a post-secondary diploma or certification, leaving a large population of Montana workers just a few steps away from completing their training.

Using Montana Department of Labor & Industry employment forecasts through 2028 and the Bureau of Labor Statistics minimum training requirements, the number of jobs requiring some post-secondary training will increase by 1% over the next ten years. Roughly 20,000 new jobs will be created in Montana over the next ten years that require some level of post-secondary training.

### SKILLS GAPS:

Using the 35 skills identified by O\*Net and Montana Department of Labor & Industry employment forecasts, there are unlikely to be large skill gaps at the macroeconomic level in Montana in the next ten years. Although future jobs are likely to require more computer skills, the average skill score required in the economy ten years from now is not statistically different from the current skill level.<sup>10</sup>

However, the Department is updating analysis on gaps between the demand for workers from Montana employers compared to the supply of workers exiting Montana's college system. The results of this analysis (available in 2022) will be used to adjust training offerings and allocate worker training resources.

#### **(1) 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 –

**(B) 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 partners programs included in this plan, and mandatory and optional one-stop delivery system partners.

The state of Montana coordinates activities across sectors to meet workforce needs throughout the state. The following state agencies coordinate statewide workforce development activities:

- Montana Department of Labor & Industry (DLI):
  - Adult (WIOA Title I);
  - Youth (WIOA Title I)
  - Dislocated Worker (WIOA Title I);
  - Wagner Peyser (Wagner-Peyser Act, as amended by WIOA Title III);
  - Senior Community Service Employment Program (SCSEP) (Title V of the Older American Act);

<sup>10</sup> Holom, Nick. 2021. Montana Employment Projections: Job Growth from 2020 to 2030. Montana Department of Labor & Industry. Available at <https://lmi.mt.gov/docs/Publications/LMI-Pubs/Labor-Market-Projections/Projections2018-28.pdf>.

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- Trade Adjustment Assistance for Worker Programs (Chapter 2, Title II of the Trade Act);
  - Jobs for Veterans State Grants (Title 38, Chapter 41); and
  - Migrant and Seasonal Farmworker Program (WIOA Title I)
- Office of Public Instruction (OPI):
  - Adult Education and Family Literacy (AE) (WIOA Title II)
- Department of Public Health & Human Services (DPHHS):
  - Vocational Rehabilitation (Title I Rehabilitation as amended by WIOA Title IV); and
  - Temporary Assistance for Needy Families (TANF)
- Montana Department of Commerce: (MT HB0523 / MCA 53-2-1203)
  - Workforce Training Grant (WTG)
  - American Rescue Plan Act (ARPA) Workforce Training Grant (WTG)
- Office of the Commissioner of Higher Education
  - Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act (Perkins V) (20 U.S.C. 2301 et seq.)

The COVID-19 pandemic also introduced two new program opportunities via federal pandemic relief funds in the form of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) and the American Rescue Plan Act (ARPA). Directed in bulk to states rather than allocated to specific federal and state agencies, these funds have provided an opportunity for creation and delivery of workforce and related programs outside the limits and scope of traditional federal workforce program eligibility requirements. Specific uses continue to be proposed and impacts evaluated for their potential to positively impact pandemic-related labor force realities and provide further support for the public workforce system.

All programs and partners coordinate regionally through the state's one-stop system, secondary and post-secondary education outlets, community-based organizations, and on the State Workforce Innovation Board (SWIB). Each program also uses labor market information (LMI) to develop regional strategies for training and workforce development. In addition to the use of LMI to develop training priorities and help customers using the one-stop system, the state maintains a comprehensive Eligible Training Provider List (ETPL) that is used by all Title I WIOA service providers across the state. The ETPL provides customers information on program description, the cost of the program, additional fees for the training program, program credits and hours, and wage and program success for customers.

The state's vocational rehabilitation program uses LMI for all cases during the process of developing the vocational objective for the individualized plan for employment as a tool to help the customer make an informed choice in their career plan. In addition, LMI is also referred to when the consumer shows interest in changing their vocational objective. Vocational rehabilitation also uses LMI with many of the pre-employment transition services (PreETS) provided to students aged 14-21 that are currently enrolled in an education program for career exploration.

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Adult Education programs throughout the state also use LMI to assist students in career exploration and goal setting toward their path to employment or post-secondary education. In addition, Adult Education programs use LMI to coordinate with required partners and additional regional partners to develop curriculum and integrated education and training opportunities to meet workforce needs.

The State Workforce Innovation Board (SWIB) ensures that workforce activities are aligned with 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 data and demand-driven, flexible, and responsive to the needs of Montanans.

The SWIB guides Montana's one-stop system and coordinates the workforce activities at the state-wide and community level through policy and guidance on workforce programs. Workforce activities are customized to fit the needs of individual communities and customers – both business customers and jobseekers. The partnerships and collaboration guided by state agencies and the SWIB form a fully integrated workforce system comprised of both core and non-core program partners and community stakeholders that coordinate to provide impactful services and activities throughout the state.

The SWIB is tasked with procuring a one-stop operator for the operation and oversight of Montana's one-stop system in accordance with WIOA 121(d). The SWIB prioritizes the coordination of services with both core and non-core partners at the community level to ensure the best service delivery to customers. The State of Montana works continuously to improve program integration across partners through regular meetings with partners at Community Management Team meetings, training, data integration, and development of common intake processes.

<p><b>(C) THE STRENGTHS AND WEAKNESSES OF WORKFORCE DEVELOPMENT ACTIVITIES.</b> Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.</p>
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Montana is a geographically large, industry-diverse state. The rural nature of Montana poses unique challenges and opportunity for workforce development, coordination of services, and business engagement. Locally driven initiatives are where we see the greatest successes throughout the state. Workforce program administrators throughout the state are coordinating at regional and community levels through participation on community management teams, designed to coordinate services and develop regional workforce development strategies.

In most urban areas throughout the state partnerships include economic development associations, K-12 education, post-secondary education, coordinated employer networks, and other non-governmental organizations that work together to develop large systems and create buy-in from stakeholders to meet current and future workforce challenges.

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Rural areas throughout the state are also hubs of innovation. Many of the rural areas lack resources and infrastructure; however, rural areas are looking at ways to coordinate at the community level and leverage regional relationships to develop innovative methods to meet workforce and economic development challenges. All core partners are required to serve and coordinate in rural areas, and successful service delivery is reliant on local relationships and additional partnerships.

Notable best practices occurring throughout the state include, but aren't limited to:

- Partnerships among K-12, post-secondary, and employers, particularly with coordination around Perkins career and technical education, work-based learning, training mid-career workers, and serving adult learners;
- Developing tools to ensure partners can use labor market information to develop demand-driven workforce programs and provide meaningful training for individuals within the public workforce system;
- Facilitating structured personalized work-based learning opportunities for high school students to earn course equivalency by demonstrating subject matter proficiency while working in industry which can lead to either post-secondary education or direct to industry career path planning; and
- Establishing technical apprenticeship curriculum, like healthcare and IT, in coordination with two year and community colleges across the state.

The state of Montana continues to improve service delivery across partners to ensure customers are able to navigate the services within the system and program referrals are seamless for customers. Additional cross-training for providers is occurring to help with service delivery; however, the rural nature of the state continues to make service delivery challenging in some areas.

<b>(D) STATE WORKFORCE DEVELOPMENT CAPACITY.</b> Provide an analysis of the capacity of State entities to provide the workforce development activities in (A), above.
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Workforce development is a priority for the state of Montana and the state continues to partner across agencies to develop an effective workforce system. The Office of the Governor and leadership from across the state are committed to the evaluation and continuous improvement of Montana's education and workforce systems to ensure partners coordinate services and understand the state's workforce needs and challenges. In addition to the SWIB, which has representation from across agencies and industries, the governor regularly convenes cabinet members and elected officials to develop specific strategies and provide leadership for the state to meet workforce challenges.

The state of Montana understands that the capacity of the state's workforce and talent development system is dependent on continued communication and collaboration across agencies and partners. Leadership at the state level is making meaningful impacts in communities across the state. Training and collaboration have led to the development and ongoing work of the following:

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- Technical assistance to regional stakeholders around sector partnerships and strategies;
- Facilitation of statewide business engagement training for all core partners, industry, education, and economic entities from across the state;
- Cross training across core partner programs to increase programmatic understanding and improve client services and case management;
- Increased collaboration and client services at the community level within Community Management Teams;
- Increased understanding and coordination across partners and industry to grow work-based learning opportunities across the state; and
- Development of shared labor market information tools for career and technical education, economic development, and other key data points.

In addition to ongoing efforts to engage partners and provide meaningful training and collaboration opportunities the state of Montana is beginning the following collaborative projects to better serve customers across the state:

- Coordinating with industry, education, and workforce partners to understand and map credentials across agencies;
- Deepen and strengthen relationships with economic development partners, educators, and industry to ensure workforce development efforts align with economic needs;
- Collaborate with industry and health and human services partners to serve Medicaid participants;
- Continue working with education partners to deepen understanding and awareness about career and technical education in secondary and post-secondary institutions; and
- Continue partnering with Vocational Rehabilitation and Blind Services on strategic business engagement on behalf of clients with disabilities.

**(b) STATE STRATEGIC VISION AND GOALS.** The 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.

Montana's workforce and talent development system will continue delivering data-driven services and provide opportunities for its current and future workforce and businesses to sustain economic viability through partnerships and collaboration. Partners within the public workforce system will integrate service delivery, use data analysis, and review and evaluate programs to continuously improve services across the state.

**(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:

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

#### ACCESS:

The state of Montana is committed to designing a public workforce and talent development system that is programmatically and physically accessible to all Montanans, including youth and those with barriers to employment. The state continues working on and prioritizing service delivery, cross training, and the development of deeper understanding of all workforce and education programs to ensure that all those served receive the resources, training, education, and support needed to succeed in Montana's economy.

#### ALIGNMENT:

The state of Montana is aligning and cross-training on programs to ensure that all customers of Montana's workforce system experience seamless service delivery. Coordination and alignment of service ensures that resources are braided and used to best serve customers efficiently. Moving forward, the state of Montana will continue to focus on additional program alignment through system integration to ensure that all staff servicing clients have the necessary information to understand a holistic picture of the customer.

#### ACCOUNTABILITY:

Montana's workforce programs will have successful outcomes that provide clients with access to meaningful training and employment services to succeed in Montana's economy. Montana's workforce and training programs will continue to adapt and evolve to ensure programs are flexible and responsive to changing economic conditions and client services will continue to be measured based on outcomes and goals set by law and the SWIB.

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

#### ACCESS:

Montana's public workforce system will coordinate employer engagement across sectors throughout the state to ensure workforce needs are understood and the workforce system is responsive to those needs. In addition, coordinated employer engagement will ensure that employers understand the services designed to support talent recruitment, development, and retention.

#### ALIGNMENT:

The state of Montana will align business services across core partners and others to ensure that all businesses that engage with workforce, education, and training providers receive similar information about services and programs targeted to support workforce and talent development. In addition, the state of Montana will develop an education strategy for partners on the assessment of data to understand business cycles and proactively assist businesses and help with layoff aversion before a rapid response event. Cross training on programs, ongoing partner engagement, and system enhancement will foster consistency and allow for meaningful business engagement across the state.



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### **ACCOUNTABILITY:**

To ensure Montana's workforce programs are effectively serving Montana businesses, Montana's public workforce and talent development system will continue cross training on programs and seeking opportunities for additional partnerships and collaboration. The state will ensure that business engagement tracking and accountability is built into systems to measure effectiveness and seek opportunities for improvement.

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

See Appendix 1.

**(4) ASSESSMENT:** Describe how the state will assess the overall effectiveness of the workforce investment 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.

Montana's core WIOA programs continue assessing effectiveness using the WIOA Primary Indicators of Performance. In addition, the SWIB set additional performance goals to ensure Montana continues to improve its processes to better serve clients using the public workforce system.

The state of Montana continues to provide leadership at the state level. Agencies are better aligned and offering better guidance to those providing direct services to clients across programs. In addition, the state of Montana continues reviewing data and collaborating with economic development, industry, education, and additional community partners to ensure that the public workforce system is responsive to employment needs and that alignment between education, training and talent development continues to meet those challenges.

Montana's SWIB will assess the public workforce system and partner programs using performance data gathered and presented to the board and seek additional input from statewide stakeholders and implementation of promising practices in other states. The SWIB will work with the one-stop operator to seek opportunities for continuous improvement of the public workforce system and additional opportunities to braid state and federal funding to best support clients using programs administered through the one-stop system.

**(c) STATE STRATEGY:** The 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).

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### **(1) Describe the strategies the State will implement, including sector strategies and career pathways, as required by WIOA section 101(d)(3)(B), (D).**

The state of Montana will continue expanding sector strategies to continue enhancing and strengthening its economic vitality by addressing employer and job-seeker talent requirements. Sector partnerships are an important component of coordinating services and integrating resources to design a public workforce and talent development system that's responsive to key industries throughout the state.

Montana will continue using LMI as the basis to map and assess current industry clusters and develop statewide strategies to engage industry and understand the skills required to meet current and future workforce challenges. The state of Montana will continue to provide training to regional partners on business engagement and work on coordinating across partners to develop industry-specific regional workforce and talent development strategies.

In addition to aligning core partners to best serve industry and develop meaningful sector partnerships across the state, sector partnerships must also closely align with education systems to develop flexible and responsive career pathways. Perkins V reauthorization will allow the public workforce and talent development systems to better coordinate with both secondary and post-secondary education partners across the state. As required under Perkins V, the state's career and technical education (CTE) programs will also use LMI to design CTE coursework to ensure that coursework and training are aligned with the labor market.

Sector partnerships and industry engagement have helped the state of Montana develop its career pathways and training programs to ensure that WIOA clients, students, and learners at every level have the training, education, and skills to enter into meaningful employment. The state will continue partnering at the state and local level to develop training and education opportunities and programmatic alignment to ensure that all those served through the workforce or education systems receive the training and preparation they need to successfully transition into the workforce.

Additionally, Montana will continue to evaluate ARPA funding opportunities that expand the ability of the public workforce system to engage and support businesses with recruiting, retention, and job training.

### **(2) Describe the strategies the state will use to align the core programs, any Combined State Plan partner program included in this Plan, required and optional one-stop partner programs, and any other resources available to the State to achieve fully integrated customer service consistent with the strategic vision and goals described above. Also describe strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2)**

The state of Montana understands that the capacity of the state's workforce and talent development system is dependent on continued communication and collaboration across agencies and partners. Leadership at the state level is making meaningful impacts

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in communities across the state. Training and collaboration have led to the development and ongoing work of the following:

- Technical assistance to regional stakeholders around sector partnerships and strategies;
- Facilitation of statewide business engagement training for all core partners, industry, education, and economic entities;
- Cross training across core partner programs to increase programmatic understanding and improve client services and case management;
- Increased collaboration and client services at the community level within Community Management Teams;
- Increased understanding and coordination across partners and industry to grow work-based learning opportunities across the state;
- Development of a shared labor market information tool for career and technical education, economic development, and other partners;

In addition to ongoing efforts to engage partners and provide meaningful training and collaboration opportunities the state of Montana is beginning the following collaborative projects to better serve customers across the state:

- Coordinating with industry, education, and workforce partners to understand and map credentials across agencies;
- Deepening and strengthening relationships with economic development partners to ensure workforce development efforts align with economic growth strategies;
- Collaborating with industry and health and human services partners to serve Medicaid participants;
- Continuing to work with education partners to deepen understanding and awareness about career and technical education in secondary and post-secondary institutions and work-based learning opportunities;
- Continuing to partner with Vocational Rehabilitation and Blind Services on strategic business engagement on behalf of clients with disabilities; and
- Developing a state-wide work-based learning collaborative to better align opportunities across various state and local entities to streamline data, funding, and programmatic resources to benefit various educational opportunities; including but not limited to, on-the-job training, apprenticeships, stackable credentials, and degree programs.

The ongoing work listed above is part of the state's larger vision of a coordinated, aligned workforce and talent development system across sectors to best serve all Montanans. The goals of access, alignment, and accountability are inclusive and are the underpinning of the overall strategic vision of one large system designed to serve all and meet Montana's workforce and talent challenges.

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### 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 partners 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 mission of Montana's State Workforce Innovation Board (SWIB) is to advise the governor on statewide workforce development strategies that maximize the state's education, training, and employment resources in support of economic development. The board leads the state in broad strategic workforce initiatives that leverage resources beyond WIOA funding, while providing necessary system oversight.

Montana's State Workforce Innovation Board Chair is appointed by the governor, and the board works through a committee structure designed by the board chair in consultation with staff. Committees include the Executive Committee, the WIOA Committee, and the Strategic Workforce Initiatives Committee. All three committees work on policy, WIOA implementation, and the strategic vision for the role of the public workforce and training system in Montana.

In addition, the board oversees the State Registered Apprenticeship Council as an ad hoc committee. The role of the State Registered Apprenticeship Council is to advise the state's registered apprenticeship program on best practices and help the program meet its goals for registered apprenticeship.

The board also assembles ad hoc committees to work on topic-specific issue recommendations from the governor and established priorities of the SWIB.

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The board conducts two in-person meetings per year, typically taking place in the fall and spring. Additional meetings are convened by the chair in consultation with the Director of the SWIB and the Commissioner of Labor & Industry. Committee and task force meetings use electronic communication. Meeting notes are posted on the State Workforce Innovation Board website at [swib.mt.gov](http://swib.mt.gov).

The SWIB meets its functions under section 101(d) of WIOA by doing the following:

- Making policy recommendations to the governor related to the establishment and maintenance of an efficient, integrated, statewide workforce development system to train the maximum number of unemployed and underemployed Montanans as possible;
- Leading the strategic planning process for an integrated workforce development system, in consultation with community management teams and local workforce organizations outside the state's workforce development system;
- Creating performance standards that identify effective workforce development initiatives;
- Coordinating the state's workforce innovation initiatives with the state's economic development plan;
- Promoting a system of workforce development that responds to the lifelong learning needs of Montana's workforce;
- Encouraging public-private partnerships and facilitating innovations in workforce development policy and practices including local workforce organizations outside the State's Workforce Development System;
- Reviewing local adult education proposals to offer recommendations for workforce alignment;
- Ensuring a quality workforce system by evaluating results and supporting high standards and continuous improvement; and
- Coordination with organizations outside its Workforce Development System for opportunities to support local, business engaged, innovative workforce programs.

SWIB is implementing the following to ensure it meets its priorities as listed above:

- SWIB's standing committees include the following and the board adds committees and evaluates its structure and subcommittee work on an ongoing basis:
  - Executive Committee:
    - The committee will be composed of a majority of business members, but shall include the governor or their designee, and the cabinet officer from the Department of Labor & Industry. This committee may also include the cabinet officers from other relevant state departments responsible for workforce development initiatives.
    - This committee will have the authority of the SWIB when SWIB action is required.

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- Duties will include but are not limited to tracking workgroup plans and progress; offering leadership around the alignment of workgroups; offering leadership around leveraging system partners; and driving provisions of critical workforce data.
- WIOA committee:
  - Is responsible for understanding and making decisions on WIOA rules and regulations; administering the state's "One-Stop" Certification Process; and coordinating and implementing the state plan.
  - Strategic Workforce Initiatives Committee:
  - The committee will work on developing guidance and resources that are specific and have broad impacts on the workforce and talent development across the state.

**(2) IMPLEMENTATION OF STATE STRATEGY:** Describe how the lead State agency with responsibility for the administration of each core program or a Combined State Plan partner program included in this plan will implement the State's Strategies identified in 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.

The state of Montana understands that coordination across partners is critical in the implementation of a fully integrated public workforce and talent development system. Statewide leadership, guidance, and collaboration have established the foundation of an integrated public workforce and talent development system, and the state of Montana intends to build on that foundation by implementing the following strategies:

- Data alignment;
- Cross training across partners; and
- Coordinated and strategic business engagement.

**DATA ALIGNMENT:**

All core programs use LMI to serve clients and ensure that training and career development strategies are aligned to industry needs in the area. The common use of LMI to serve businesses and individuals in Montana's public workforce and talent development system allows for seamless service delivery across programs to help individuals transition into training or employment and develop talent to support business and economic growth.

**CROSS TRAINING ACROSS PARTNERS:**

The state of Montana will continue providing training opportunities at the state and local level for partners to learn about partner programs and how the programs can work together to best serve clients in the public workforce and training system across the

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state. Cross training will build a better understanding of partner programs and allow for seamless service delivery across partners and ensure that programs aren't duplicating efforts across the system. In addition, a better understanding of core programs will allow partners to establish common goals, regionally, and strengthen relationships with other partners to better meet regional economic needs.

### **COORDINATED AND STRATEGIC BUSINESS ENGAGEMENT:**

The state of Montana will continue growing its statewide business engagement strategy by coordinating across partners at the regional level to meet business challenges and ensure continued economic growth. In addition to tracking business services through the integrated case management system and using LMI to understand state and regional economies, the state of Montana will work on the following:

- Develop an education strategy for partners on the assessment of data to understand business cycles to proactively assist businesses and help with layoff aversion before a rapid response event;
- Grow sector strategies and partnerships at the state and regional level to identify skills, credentials, and education required for occupations within sectors; and
- Work collaboratively across partners to identify education and training partners that are able to work with clients to develop the skills and attain the training necessary to succeed in the workforce.

**(B) ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN:** Describe how the activities identified in (A) will be aligned with programs and activities provided by mandatory one-stop partners and other optional one-stop partners and activities provided under employment, training (including RAs), education (including CTE), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.

The state of Montana coordinates workforce, secondary education, and postsecondary education systems across the state to best serve Montanans. Programmatic alignment is required under both WIOA and Perkins and is a priority of the governor who convened a group of cabinet-level, elected, and appointed representatives to discuss program alignment and define specific targets and goals for workforce and education programs. The state of Montana aligns workforce and education programs by coordinating the use of labor market information (LMI) between agencies and broadening its understanding and mapping credentials and degree attainment related to high-skill, high-wage, and in-demand occupations. Much of the planning and alignment between workforce and education systems took place throughout the Perkins V planning process to ensure that both WIOA and Perkins programs were complimentary to each other.

The Montana Department of Labor & Industry (DLI) worked with the Office of Public Instruction (OPI) and the Office of the Commissioner of Higher Education (OCHE) to develop a dashboard to help Perkins-receiving institutions align career and technical education (CTE) programs to regional workforce demand. This dashboard was a direct response to Perkins V requirements for CTE program design. In addition, the dashboard

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is external-facing and will also help WIOA service providers assist clients with career exploration and training.

The state of Montana's registered apprenticeship program works closely with Montana University System's two-year and community colleges to design technical and education components of apprenticeship programs. The coordination between education partners and Montana's registered apprenticeship program allows the state to design modern apprenticeships and develop and expand pre-apprenticeships to meet employer needs in communities throughout the state. Because Montana's registered apprenticeship program continues to develop new in-demand apprenticeships, the apprenticeship model is becoming more appealing for students within a career pathway.

Due to Montana's tight labor market, employer engagement between education and workforce programs continues to grow as more employers are seeking innovative ways to meet their worker challenges. Work-based learning (WBL) models and integrating WBL into CTE programs across the state allows educators, students, and employers new ways to engage and learn on jobsites and in the classroom. Montana continues to develop guidance for educators and employers on WBL models and design meaningful experiences for students and adult learners. Growth in this area is allowing for meaningful coordination between programs at the state and local level.

The SWIB continues to support and require meaningful coordination of services and education partners to develop a well-trained workforce and ensure the state continues to grow economically. To that end the SWIB is funding an effort to, after five years, update the information and results published in the "Meeting State Worker Demand: A Report on the Labor Market Outcomes for Montana Colleges" report. The initial report became a reference point for industry and education and is being updated at their request. The new report is expected to be published in Spring 2022.

### **(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 mandatory and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services to individuals including those populations identified in section II(a)(1)(B). The activities described shall conform to the statutory requirements of each program.

Montana's core partners continue to strengthen relationships that benefit mutual customers across programs. Partners continue to align resources, promote efficiency and identify common customers. In addition, the state of Montana will continue working on cross training and deepening relationships across programs to ensure customers receive the most benefit from the public workforce and training development system.

Given Montana's small population and limited resources, it is necessary to coordinate services across partners to effectively serve all Montanans interacting with the public



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workforce system. Montana's Job Service offices, community-based organizations, AE, and VRBS are working at the state and local level to develop best practices and identify opportunities to continue alignment to meet workforce challenges. In addition, TANF and SNAP programs partner with the workforce system to holistically serve clients enrolled in those programs.

Moving forward the state of Montana will continue to focus on coordination across partners to enhance services to individuals and meet its larger vision of a fully aligned workforce and talent development system. All partners within the public workforce system will:

- Participate in community-based initiatives and groups, in addition to the established community management teams, designed to collaborate and align public services to better serve customers;
- Participate in and collaborate on cross training across partners to deepen understanding of partner programs and how they serve clients; and
- Seek opportunities to strengthen local partnerships with education, industry, economic development, local government, and other stakeholders to ensure services offered through the one-stop system are meeting the local workforce needs.

As stated above, in addition to coordination across WIOA partners, the state of Montana continues to align and coordinate workforce development with Montana's secondary and post-secondary education systems. Programmatic alignment is required under both WIOA and Perkins and DLI, OCHE, and OPI worked together to align the programs under the Perkins and WIOA umbrellas. In addition to programmatic alignment, the agencies are working together to promote and engage broad stakeholders in cultivating a better understanding of career and technical education and work-based learning.

### **(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, mandatory 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. The activities described shall conform to the statutory requirements of each program.

Montana's WIOA partners continue to coordinate services to employers and work together to meet the workforce needs of the state. Montana will continue building on its successes with sector partnerships and coordinated engagement by expanding relationships with business associations, chambers of commerce, local industries, economic development entities, education systems, and additional statewide and local partners to ensure the services provided within the public workforce system support talent recruitment, development, and retention across the state.

The state also promotes community colleges, two-year colleges, and tribal colleges as essential local and regional suppliers of Montana's trained workforce. Increasing the involvement of employers in curriculum development, certifications, credentials, with a

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focus on workforce development is a critical component of Montana's talent development system.

Work to increase alignment across programs and develop consistent tracking accountability through system development will help programs develop strategic business and industry engagement across sectors. The state remains committed to developing an efficient, effective, and responsive delivery system for education and training programs designed to meet the needs of employers across the state. The state will continue promoting success through alignment by:

- Developing and implementing a statewide policy framework to align programs serving the needs of training providers, educational institutions, and employers;
- Supporting the Montana University System's efforts to enhance coordination between employers and education systems;
- Better understanding Montana's credential system and ensuring that credentials offered through the university system and other training providers are meaningful to business and industry;
- Increasing alignment with economic development entities and collaborating on shared initiatives, promotion of new businesses, and support of entrepreneurship;
- Alignment of programs to meet local training needs of in-demand industry occupations
- Developing a state-level industry engagement strategy that supports and enhances local business services; and
- Seeking additional partnerships with organizations outside the workforce and talent development system to support local, employer-engaged, innovative talent development programs.

**(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).

As stated above, the state of Montana has established partnerships with the state's university system and K-12 schools, which guides the priorities of the state's community and two-year colleges. Montana's public workforce system and the state's university system are currently working on, and will continue to collaborate on, the following coordinated efforts:

- Perkins V and the integration of LMI as a tool to develop curriculum within CTE programs at both the secondary and post-secondary level;
- Curriculum development for technical apprenticeships coordinated between the state's registered apprenticeship program, employers, and two-year or community colleges;
- Collaboration among OCHE and DLI to engage individuals who started, but did not complete, a degree program through the higher education system and help those individuals obtain a degree or credential;

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- Collaboration between Adult Education and two-year and community colleges to develop pathways for adult learners;
- Collaboration among DLI, OPI, OCHE, and industry representatives to navigate the current landscape of certifications across the state and ensure that training provided and certificates issued through Montana's university system or other training providers are relevant to industry; and
- Development of meaningful work-based learning opportunities for secondary and post-secondary students.

Leadership within the public workforce system, the university system and K-12 schools are committed to serving all Montanans, and the state of Montana recognizes workforce training and talent development will ensure Montana continues to prosper and have a talented, trained, and educated workforce.

### **(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.

The state of Montana's Eligible Training Provider List (ETPL) is part of an overall strategy to ensure informed customer choice for training, performance accountability, and continuous improvement in education and training. All partners use the ETPL for guiding clients through education and training options. The ETPL includes training providers whose performance qualifies them to receive WIOA funding to train individuals using the public workforce and talent development system.

Montana's registered apprenticeship program continues to grow and is uniquely poised to meet industry-specific workforce development needs through the development of curriculum and rigor of training. As such, Montana's registered apprenticeship programs have the option for automatic placement on the ETPL.

The state's Adult Education program contracts for education and training services to bring research-based activities that support adult learners in content areas and workforce learning activities. Program data informs the state on promising instructional practices and effective instructional strategies. The state shares information about models and promising practices related to the needs of adult learners across providers. In programs where students readily make gains in reading, the state will support staff in the development of teacher lessons, resource links, and fund preparation for training to assist colleagues in successful reading instruction.

Montana's partners continue to collaborate and leverage resources to promote dialog between employers, workers, training providers, and agencies to develop career pathways within industry, close skill gaps, address needs of special populations, and align curricula and training to meet the demands of the workforce.

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**(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).

There are multiple funding sources available in Montana to fund training and education programs. The state of Montana will continue working across partners to braid funding to support the following:

- Coordinated industry and employer engagement to identify training and workforce needs and develop registered apprenticeship or education pathways to meet their needs;
- Development of systems to align data and develop common intake to benefit all service providers and streamline referrals, ensure greater accountability, and increase collaboration across partners; and
- Support statewide training on partner programs and foster a greater understanding of the following:
  - Career pathways;
  - Registered apprenticeship;
  - Use of LMI;
  - Rapid Retraining; and
  - Identifying and sharing best practices across partners.

In addition to aligning resources at the state level, there are regional and community-based workforce initiatives happening across the state with community-based partners leveraging local and philanthropic resources to coordinate education, industry, economic development, and workforce systems to meet local needs.

All state, federal, local, and philanthropic resources leveraged throughout the state help further develop a fully accessible, aligned workforce and talent development system designed to meet Montana's workforce challenges and better serve all clients, both individuals and businesses, receiving services across programs.

**(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.

Statewide alignment across partners, agencies, secondary and post-secondary systems will ensure that more Montanans have access to, and the ability to attain a postsecondary credential. In addition, the state of Montana will develop a plan to identify and track credential attainment across the state. The state will leverage the following strategies to increase access to postsecondary credentials:

- Dual Enrollment:
  - The state of Montana will continue to expand access to and participate in dual enrollment courses, across a variety of course types and in high schools of all sizes.

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- Career and Technical Education (CTE) and Work-Based Learning:
  - The state of Montana will work across agencies and partners to develop a process to evaluate which industry-recognized credentials are credentials of value to employers in Montana; and
  - Ensure that CTE educators are able to access and understand LMI and how it applies to the development of CTE programs of study;
- Registered Apprenticeship:
  - Continue engaging employers and partners to support and expand registered apprenticeship opportunities across the state.
- Retention and Degree Completion:
  - Work across partners to support the implementation of strategies to increase retention and graduation rates across Montana's university system; and
  - Support the establishment of national best practices for data collection, analysis, dissemination, and use data-informed decision making to continue enhancing programs across higher education.
- Military Service:
  - Continue supporting and promoting military service as a valuable career track for students to attain postsecondary education, training, certification, and career opportunities; and
  - Continue working across partners to support the transition of veterans to postsecondary degree or credential attainment, including through prior learning assessments.

**(I) COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES:** Describe how the activities identified in (A) will be coordinated with economic development entities, strategies, and activities in the State.

At the state level, workforce partners are engaged in the state's larger economic development vision. As the Governor's Office and Montana's Department of Commerce work with Montana businesses, lack of available workers has become the biggest challenge to significant and sustained economic growth in communities across the state. The lack of workers demands that workforce partners, agencies, and economic development partners work together to meet the workforce challenges.

In many of Montana's communities, both large and small, there is successful collaboration happening through coalitions of groups working together to meet economic and workforce challenges specific to those communities. Groups include, but aren't limited to:

- Local economic development entities;
- Local Chambers of Commerce;
- Industry leaders;
- Education partners;
- City, county, and state elected officials;
- Community foundations;
- Adult education;

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- Local job service offices;
- Vocational Rehabilitation and Blind Services;
- Two-year and community colleges; and
- Other community-based service providers.

These groups look at the community as a whole to identify community needs including sustained economic growth, issues impacting workforce recruitment, retention, and training, industry needs, infrastructure needs, housing and healthcare accessibility, education and industry partnerships, and other community needs.

State agencies work to support locally developed solutions to the sustained economic growth and workforce development issues within communities. The state supports this work through the development of training and education to meet industry needs, assistance developing and sustaining sector partnerships, and staff support.

- (b) STATE OPERATING SYSTEMS AND POLICIES:** The Unified or Combined State Plan must include a description of the State operating systems and policies that will support the implementation of the State strategy described in section II Strategic Elements. This includes:
- (1)** The State operating systems that will support the implementation of the State's strategies. This must include a description of:
    - (A)** State operating systems that support coordinated implementation of State strategies (e.g., LMI systems, data systems, communication systems, case management systems, job banks, etc.).
    - (B)** Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers.

The Research and Analysis Bureau of DLI provides online access to labor market information and data at <http://lmi.mt.gov>. The website pulls data from the Workforce Information Database developed by the Analyst Resource Center, under a grant from the U.S. Department of Labor Employment and Training Administration. The data provided is produced by the Bureau's cooperative programs with the Bureau of Labor Statistics (BLS) as well as other data sources, such as the U.S. Census Bureau, BEA, and administrative programs. The Montana Career Information System (MCIS) is the state's chosen system for providing comprehensive career information under WIOA. MCIS provides career assessments, state and national occupational, education and training information. All occupational information comes from the Research and Analysis Bureau's Occupational Employment Statistics and the U.S. Department of Labor's O\*Net database. Each job seeker will create an e-portfolio in MCIS in order to save assessment results, occupational and education research, create resumes, and other career planning activities. MCIS enables the core partners to access the portfolio contents for shared clients, resulting in a seamless delivery of career services across programs.

WIOA programs under Titles I and III collect client intake and program activity data, including any information required for reporting, using the MWorks system. WIOA

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programs under Title II collect client data using the MACS system and data under Title IV is collected using the WellSky system.

Each program's client data is tracked individually in each system during the client's participation period. Any performance reporting unique to a specific program are handled within the program's relevant system.

DLI developed a system for creating statewide reports. The reporting system is a three-layered data system consisting of a staging, integrating, and reporting layer. The final output of the system is the Participant Individual Record Layout (PIRL), and other reporting documents.

- On a quarterly basis each program submits the necessary client data from each programs' respective data system to DLI. Demographic indicators, client specific program activity, and performance are among the data transmitted.
- The data submitted by programs first enters the staging layer where data is validated for formatting requirements.
- Once validated, data moves to the integration layer where records from clients in multiple programs are reconciled and external data sources used in reporting, such as UI wage records, are brought in.
- Once reconciled, the data in the integration layer moves to the reporting layer where performance values are calculated and stored. The reporting layer is the basis upon which reporting documents, such as the PIRL, are created.

The reporting system connects to UI wage records, State Wage Interchange System (SWIS) and other systems which are matched to clients using social security numbers as a common identifier.

**(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 program's contributions to a one-stop delivery system.**

DLI publishes and maintains all WIOA policies and guidance regarding the operation and service delivery of WIOA programs in keeping with state and federal laws and regulations here: <http://wsd.dli.mt.gov/wsd-policy#WIOA-2385>

DPHHS maintains guidance on WIOA as it pertains to VRBS programs here: <http://dphhs.mt.gov/detd/vocrehab>.

OPI maintains guidance on WIOA as it pertains to AE programs here: <http://opi.mt.gov/Families-Students/Student-Resources/Veterans-Adult-Education>

For ongoing, updated, or new guidance, WIOA core partner agencies and the SWIB draft, publish and coordinate policy guidance, service delivery strategies, program and related measurements, and funding.

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The state's one-stop partners, in conjunction with SWIB, developed guidance for the one-stop partner program's contributions to the one-stop delivery system based on guidance received from US DOL. Guidelines are found in the state's One-Stop System Policy and the Infrastructure Funding Agreement is reviewed annually with each partner as part of the process for renewing the required Memorandum of Understanding (MOU).

### **(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.

Workforce Services Division within DLI is responsible for administering WIOA Title I and Wagner-Peyser programs, as well as the following programs:

- Trade Adjustment Assistance;
- Work Opportunity Tax Credit;
- State Registered Apprenticeship;
- State Displaced Homemaker;
- Migrant and Seasonal Farmworkers;
- Senior Community Services Employment Program;
- Foreign Labor Certification;
- Federal Bonding National Emergency Grants;
- Montana's Incumbent Worker Program;
- Jobs for Montana's Graduates;
- Reemployment Services and Eligibility Assessment (RESEA);
- Medicaid Expansion Workforce Program (HELP Link);
- Labor Market Information;
- Jobs for Veterans State Grant Program;
- The Job Service Operations Bureau;
- State Approving Agency (for GI Bill); and
- American Rescue Plan Act (ARPA) related workforce programs.

Montana's Unemployment Insurance program is housed within DLI and coordinates clients with Montana's public workforce partners to help individuals transition into employment or training.

In addition, DLI coordinates and guides the delivery of workforce development services in local communities, in coordination with the SWIB. There is also active coordination of Registered Apprenticeship with Job Service offices, and there are plans to coordinate Job Corps services with Registered Apprenticeship and the other services offered at Job Service offices.

VRBS programs are housed within the Montana Department of Public Health and Human Services (DPHHS). The VRBS administrator is the designee for the Director of DPHHS on the SWIB and is able to provide programmatic updates to the board.



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DPHHS is also a signatory partner of the state's One-Stop Delivery System's Memorandum of Understanding and Consortium Agreement, whereby the parties agree to support all the state's one-stop system. As a workforce partner, and in an effort to better coordinate services and cross train on programs, VRBS provides training to workforce partners on their services and contributes their expertise to ensure all customers are served effectively within the system. As stated above, WIOA Title IV programs use the WellSky system to implement and track programs and services.

AE programs fall under the direction of the Montana Office of Public Instruction, and the program manager for AE is the Superintendent of Public Instruction's designee to the SWIB. The Office of Public Instruction is also a signed partner of the state One-Stop Delivery System's Memorandum of Understanding and Consortium Agreement, whereby the parties agree to support Montana's one-stop system. Additionally, AE coordinates the Interagency Career Pathways group, and members of this group include, but are not limited to, representatives from various workforce partners such as AE, DPHHS, DLI, SWIB staff, the Governor's Office, and the Montana University System. WIOA Title II programs use the MACS system to implement and track programs and services.

The state workforce system as a whole is overseen by the SWIB. The SWIB's mission is to advise the governor on statewide workforce development strategies that maximize the state's education, training and employment resources in support of economic development. The board leads the state in broad strategic workforce initiatives that leverage resources beyond WIOA funding, while providing necessary system oversight.

**(B) STATE BOARD:** Provide a description of the State Board, including:

**(i) MEMBERSHIP ROSTER:** Provide a membership roster for the State Board, including members' organizational affiliations.

### ***Public Officials / Core Partners***

Governor Greg Gianforte

Designee: Dylan Klapmeier

Office of the Governor

Superintendent Elsie Arntzen

Designee: Katie Madsen

Office of Public Instruction

Director Adam Meier

Designee: Chanda Hermanson

Department of Public Health & Human Services

Commissioner Laurie Esau

Designee: ~~Sarah Swanson~~ Pat Nelson

Department of Labor & Industry

Senator Jason Small

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Montana State Senate (SD-21)

Representative Ron Marshall  
Montana State House of Representatives (HD-87)

### ***Local Elected Official***

Commissioner Michael McGinley  
Beaverhead County Commissioner  
Commissioner Mary Armstrong  
Valley County Commissioner

### ***Workforce***

Bill Collins  
Vice President  
Easterseals Goodwill

Bo Bruinsma  
Career Outreach ~~Coordinator~~ Director  
Billings Public Schools

Jim Wonnacott  
President/Apprenticeship & Training Coordinator  
Iroworkers Local 732

Quinton Queer  
President  
Plumbers, Local 41  
and  
School Board Member  
Butte Public Schools

### ***Business***

Paul Hopfauf (Chair)  
Director of Strategic Planning & Growth  
Montana-Dakota Utilities

Dean Bentley (Vice Chair)  
HR Generalist and Labor Relations Analyst  
NorthWestern Energy

Jeaneen Campbell  
Regional Senior Sales Executive  
Blue Cross-Blue Shield of Montana

Adam Gilbertson  
Vice President

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RDO Equipment Company

Steven Nicholls  
Senior Engineer  
Water & Environmental Technologies

Jason Palin  
Vice President  
Sibanye-Stillwater

Deb Poteet  
Owner  
Poteet Construction

Paddy Fleming  
Executive Director  
Montana Manufacturing Extension Center

Heather O'Hara  
Vice President  
Montana Hospital Association

David Smith  
Executive Director  
Montana Contractor's Association

### ***Ex-Officio***

Clayton Christian  
Commissioner

Office of the Commissioner of Higher Education / Montana University System

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Scott Osterman  
Director  
~~Montana~~ Department of Commerce

**(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 standing committees of the State Workforce Innovation Board include the Executive Committee, the WIOA committee, and the Strategic Workforce Initiatives Committee. In addition, the board oversees the Apprenticeship Advisory Council, which provides guidance to the state's Registered Apprenticeship program. The SWIB also convenes ad hoc committees to work on topic-specific issue recommendations from the governor and established priorities of the SWIB. All SWIB committees conduct business

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### WIOA COMBINED STATE PLAN

as an advisory body to the Governor on statewide workforce system issues, as well as to assume responsibility for performing all WIOA local workforce board duties.

- **Executive Committee:** The Executive Committee is comprised of board officers and no more than ten at-large representatives. The majority of its members are business members. The at-large representatives of the Executive Committee shall be members of the SWIB and are appointed by the chair. The Executive Committee leads the SWIB workgroups and has the authority to act on behalf of the SWIB. The Executive Committee's responsibilities are to:
  - track workgroup plans and progress;
  - offer leadership around alignment of workgroups;
  - offer leadership around leveraging system partners; and
  - drive the provision of critical workforce data.
- **WIOA Committee:** The WIOA Committee is charged with ensuring compliance with the applicable WIOA laws and regulations governing the Title 1B Adult, Youth and Dislocated Worker programs, and to bring policy issues and recommendations to the governor and SWIB.
  - **Strategic Workforce Initiatives Committee:** The Strategic Workforce Initiatives Committee works on workforce-specific timely projects and shares promising practices from across the state.
  - **Ad Hoc Committees:** Ad Hoc Committees are appointed by the SWIB Chair to work on topic-specific issue recommendations from the governor or serve in a limited capacity to achieve SWIB-specific special projects.

#### **(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.

Service providers that administer Title I and III programs are monitored annually for program compliance as well as fiscal compliance. At the conclusion of each monitoring visit, a report is written by the monitoring unit and shared with the program managers. Program managers work directly with the local service providers to resolve monitoring findings and provide technical assistance.

On a monthly basis, program managers hold technical assistance calls with all Title I service providers to go over a variety of topics including performance accountability measures. Based on the previous quarter's reporting results, assistance is given for how to correctly report information into the management information system, as well as how to provide service to individuals that will result in higher accountability measures. Montana is working on expanding this technical assistance to include individual provider performance reporting results to better pinpoint where gaps in service are occurring.

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The Montana SWIB implemented additional performance accountability measures for all service providers operating Title 1 programs, including cost per participant goals, exited to employment goals and rapid response service goals. This allows the department to look at other outcomes and performance for quality and effectiveness of service as well as ways to improve service delivery. This also helps direct technical assistance topics as well as look at local and regional planning goals.

In addition, calls are conducted with US DOL on a quarterly basis with Title I and Title III programs to discuss PIRL reporting. Montana continues to work to improve this process for communication to provide meaningful feedback to improve the quality of our programs.

Title II programs are assessed based on data received from program outcomes and technical assistance is provided by program staff as needed. Title IV requires assessment every three years to look at the needs of citizens in the state as well as the services provided by the program.

**(B) ASSESSMENT OF ONE-STOP PROGRAM PARTNER PROGRAMS:** Describe how other one-stop delivery system partner program services and Combined State Plan partner program included in the plan will be assessed each year. Such state assessments should take into account local and regional planning goals.

Programs included in the assessment of one-stop programs include TAA and SCSEP. The TAA program is included in the program and fiscal monitoring cycle. Each provider who has TAA clients in their local area are monitored quarterly and technical assistance is provided as needed.

Since the TAA program is reported on the PIRL, the state has access to quarterly reports for the program which were not available through the old reporting system. This has allowed Montana the ability to better assess the program.

SCSEP data for the state SCSEP grant is reviewed quarterly by the program manager. Performance measures are set by USDOL, and the program manager ensures these measures are met and provides technical assistance as necessary. Data validation is conducted for the SCSEP program annually and the results of that are analyzed.

**(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 an assessment 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. .

DLI continues to focus its efforts on improving its reporting in the PIRL. The state is working to ensure that all participants are included in the data to better assess the

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performance of Title I and Title III programs under WIOA. In addition, partners are working across programs to use performance data to collaborate on service improvement.

The state of Montana will continue using data and program assessment as one indicator of the program success. In addition, the state continues to seek innovative data-driven approaches to improve the quality of programs across partners to better serve Montanans.

In addition to data collected and reviewed as part of WIOA compliance, the state of Montana uses additional data sources to develop best practices and learn more about populations using the system and barriers they face. The state is hopeful that studying populations across the state will help ensure that all individuals receive services to help them successfully transition into training, education, or meaningful employment. Data is also used to develop targeted outreach to additional community partners and groups that serve individuals with barriers to employment.

**(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 a part of providing services, client data including Social Security numbers are collected within the secure production database. Economists in the Research & Analysis Bureau of the Montana Department of Labor & Industry then extract the needed data out of the database for the evaluation period, including the necessary variables for evaluation (such as personal identifiers, services provided, location service provided, type of funding used, or other factors). Using the personal identifying information (most often the Social Security number), client data is then matched with wage records from the Unemployment Insurance Program. These wage records provide employment histories for the clients so that the evaluation can determine whether the intervention of a service changed the trajectory of wage growth or led to more consistent employment patterns than what the client previously experienced. Funding dollars are matched in from a third accounting dataset that tracks payments from the Department to various recipients. If needed, the analysis also utilized unemployment insurance claims data to determine whether the client made unemployment insurance claims prior to or after the service intervention.

Economists also occasionally do more sophisticated analysis, including regression or matching pair analysis, to research the impact of the service on the wages and employment patterns of clients. In addition, outcomes are compiled by location, type of provider, funding source, or type of service to evaluate the efficacy of how services are provided.

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The Department of Labor & Industry also has active MOUs with appropriate state government workforce and private education providers to share data needed for workforce training evaluation. These partners will continue to be important in providing information on training outcomes that may be needed for the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA.

The Research & Analysis bureau has conducted such research in the past but is now expanding their capabilities to conduct evaluative research in response to the directives in WIOA and in response to a greater need for information in planning from agency leadership. Additional staff have been hired, and greater direct access to the data has been provided to facilitate more evaluative work with increased depth and scope. Thus far, evaluative work has been completed to provide a baseline to agency management and state leadership. As these findings are presented to the SWIB and the Montana Legislature, additional research questions will be raised by political and business leaders.

The Research and Analysis Bureau strives to provide as much high-quality information as requested by these governing bodies given the funding provided by state and local authorities.

- (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);
  - (ii)** Adult and training activities in accordance with WIOA section 133(b)(2) or (b)(3);
  - (iii)** Dislocated worker employment and training activities in accordance with WIOA section 133(b)(2) and based on data and weights assigned.

Funding distribution for all Title I programs is outlined in the WIOA Funding Allocation Policy established by the SWIB is located online here:  
<https://wsd.dli.mt.gov/docs/wsd-policy/wioa-funding-allocation.pdf>.

Montana has two local areas. Local area 1 consists of Montana Association of Counties (MACo) districts 8, 12, and Meagher County, which is part of MACo district 9. Local area 2 consists of the remainder of the state of Montana. WIOA funding for the adult and youth programs is allocated to each area based on the following formula:

- 1/3 – relative share of unemployed in areas of substantial unemployment (ASU – a contiguous area with an average unemployment rate of 6.5% or greater);
- 1/3 – relative share of excess unemployed greater than 4.5%;
- 1/3 – relative to share of the total number of individuals who are economically disadvantaged.

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A local area may not receive an allocation percentage that is less than 90% of the average allocation percentage of the past two years. Once the allocation is determined by local area, funding is distributed to each MACo district by calculating the average percentage of funds received by that MACo district compared to the respective local area in the past two years. The WIOA Adult and Youth funds are contracted by the SWIB to service providers selected through RFP processes.

WIOA Dislocated Worker funds are contracted by the SWIB to one service provider selected through a formal request for proposal (RFP) process. Dislocated Worker funding is based on a formula set by the SWIB that includes insured unemployment data, unemployment concentrations, plant closings and mass layoff data, declining industries data, farmer-rancher economic hardship data, and long-term unemployment data. The SWIB applied weights and measurements to each category to determine the amount of funding allocated to Local Area 1 and Local Area 2 in Montana.

**(B) FOR TITLE II:**

- (i) MULTI-YEAR GRANTS OR CONTRACTS:** Describe how the eligible agency will award multi-year grants or contracts on a competitive basis to eligible providers in the State, including how eligible agencies will establish that eligible providers are organizations of demonstrated effectiveness.
- (ii) ENSURE DIRECT AND EQUITABLE ACCESS:** Describe how the eligible agency will ensure direct and equitable access to all eligible providers to apply and compete for funds and how the eligible agency will ensure that it is using the same grant or contract announcement and application procedure for all eligible providers.

The state will award multi-year grants on a competitive basis to eligible providers to develop, implement, and improve adult education and literacy activities. Grants will be awarded to each of the state's multi-county workforce districts to align with core partner availability and services. Many platforms will be used to ensure direct and equitable access for the competition. These platforms may include local newspapers, newsletters, press release, social media, and contacts with other state and local agencies. Eligible providers contacted may include, but are not limited to, those listed in Section 203(5): a local education agency, a community or faith-based organization, a volunteer literacy organization, an institution of higher education, a public or private non-profit, a library, a public housing authority, other non-profits that have the ability to provide adult education, a consortium or coalition of entities listed, a partnership between an employer and an entity listed.

In compliance with all state and federal procurement regulations and procedures, the competitive Request for Proposal (RFP) process will begin with a legal notice posted. This will be followed by the grant release, a bidder's conference to provide technical assistance, application review, list of accepted applicants released with follow-up budget and program negotiations with each accepted applicant. The state's electronic procurement system will be used to manage the RFP competition process.



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The district competition will adhere to the provisions set forth in WIOA Title II Section 231-Grants and Contracts for Eligible Providers and Section 232-Local Applications. All district competitions use the same RFP grant application process. Grantees that receive funds under the initial RFP competition are required to submit annual plans until the state determines it is necessary to issue a new RFP competition for the state or a specific region. The next WIOA Title II RFP competition is scheduled for spring 2022.

There are two ways in which an eligible provider may demonstrate past effectiveness. An eligible provider that has been funded previously under Title II of the Act must provide performance data required under Section 116-Performance Accountability System. An eligible provider that has not been previously funded under Title II of the Act must provide provider performance data to demonstrate past effectiveness in serving basic skills deficient eligible individuals, including evidence of its success in achieving outcomes related to employment, attainment of secondary equivalency diploma, and transition to postsecondary education and training.

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

Montana Vocational Rehabilitation and Blind Services (VRBS) distributes funding through contracts and its client benefits system. Since VRBS is a combined general and blind services agency, the funds are not distributed separately.

**(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, UI 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.
  - (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.

DLI's workforce and UI customers have the ability to create accounts through MontanaWorks with a single sign on. This portal is the first step in beginning to align data and programs to allow DLI to better serve clients and share client data across divisions and programs. DLI continues to work on developing its data warehouse to

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capture client data across programs and improve reporting, data analysis, and program performance.

(ii) Explain how the State Board will assist the governor in aligning technology and data systems across mandatory one-stop partner programs (including design and implementation of common intake, data collection, etc.) and how such alignment will improve service delivery to individuals, including unemployed individuals.

The SWIB assists the governor in aligning technology and data systems across core programs through ongoing review of program implementation and prioritizing system coordination. The board will receive regular updates on the status of alignment efforts and will make alignment recommendations to the core partners, as appropriate. The SWIB encourages alignment of technology and data systems to support the development of a true one-stop service delivery, through identification of common customers and providing suitable referrals based on data. Additionally, alignment of technology and customer data will allow programs to leverage resources, eliminate duplication and provide new opportunities for innovative cross-program solutions.

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

Montana's WIOA core partners are in three different state agencies: Montana Department of Labor & Industry operates Titles I and III of WIOA, Montana Department of Public Health & Human Services operates Title IV of WIOA, and Montana Office of Public Instruction operates Title II of WIOA.

Montana Department of Labor & Industry has enhanced the reporting system, MWorks, to function with WIOA requirements and continues to improve the system. Currently, MWorks can produce the full PIRL quarterly and annual reports in compliance with WIOA Section 116. The fiscal reporting process can accurately report all financial reports that are required under WIOA including cost per client, amount of funds spent on each type of service, career and training services, and administrative expenses.

**(B) ASSESSMENT OF PARTICIPANTS' POST-PROGRAM SUCCESS:** Describe how lead State agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.

The state of Montana captures information to assess the progress of participants exiting core programs to enter and complete post-secondary education or enter and remain in employment. This is accomplished through the Department of Labor & Industry's Research and Analysis Bureau (R&A). R&A has access to several databases that help provide information on progress of participants for these key milestones. Montana continues to work toward consolidation of data in a data warehouse or combined reporting system.

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The three core partners assess post-program success differently. Title 1 Adult and Dislocated Worker participants who exit to employment receive follow-up services quarterly. These participants are contacted at least once a quarter to see if they need assistance in job retention, wage gains, and career progress. Follow-up services for WIOA Adult and Dislocated Workers could include additional career planning and counseling, contact with the participant's employer, including assistance with work related problems, peer support groups, information about additional educational opportunities, limited financial support, and referral to support services available in the community. Appropriate follow-up services vary among participants, for example participants with multiple employment barriers and limited work histories may need significant follow-up services to ensure long-term success in the labor market.

Title 1 Youth participants must receive an offer of follow-up services for a minimum duration of 12 months. Follow-up services are critical services provided following a youth's exit from the program to ensure the youth is successful in employment and/or post-secondary education and training. Youth follow-up services may include leadership development and supportive service activities, regular contact with youth participant's employer, including assistance in addressing work-related problems that arise, assistance in securing better paying jobs, career pathway development and further education or training, work-related peer support groups, adult mentoring, and providing services as necessary to ensure the success of youth participants in employment and/or post-secondary education.

Adult Education and Vocational Rehabilitation programs follow clients after exit through performance outcomes.

**(C) USE OF 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.)

The state will use UI wage records from several sources in order to meet reporting requirements. Individual UI wage records from Montana are provided to the reporting system through a background database connection with Montana UI's Montana Integrated System to Improve Customer Service (MISTICS) system. Queries are also made to SWIS to supplement state UI wage records with out-of-state and federal employment data. The reporting system compiles and matches wage records to individuals on a quarterly basis to meet the performance requirements of WIOA.

State UI wage records, along SWIS records when appropriate, are a fundamental piece of Montana's program evaluation goals. Montana's DLI Research and Analysis (R&A) Bureau receives a quarterly file of Unemployment Insurance (UI) wage records for payroll workers in the state of Montana. These wage records are stored on secure servers meeting the federal confidentiality standards while R&A staff are experienced in matching state UI wage record files to person records and producing summary information from those records such that confidentiality is maintained. R&A staff will

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use the statistical software SAS or R to match WIOA clients with their wage records using SSNs as the primary key to link records.

Following this match, the statistical software is used to manipulate and analyze the data to support system-wide analyses of customer outcomes that result on specific program experiences. These analyses will provide information to guide staff as they assist customers in selecting jobs and training opportunities that are likely to result in quality career paths. R&A staff have produced many evaluative publications on workforce programs and the labor market in the past.

A report on the labor market outcomes of clients in the Montana Registered Apprenticeship Program demonstrates the employment and wage benefits of apprenticeship programs in general, as well as apprenticeships for specific high performing occupations.

A report shows the labor market outcomes of students graduating from the Montana University System and other voluntarily participating educational institutions. The report analyzes employment and income outcomes for college graduates by degree type and field of study.

A report identifies the employment outcomes of clients in the HELP-Link program, a workforce program component to Montana's Medicaid expansion law. The report evaluates pre- and post-participation wage data for program clients, as well as occupational outcomes to provide information on the program's efficacy and reach.

A report on WIOA Adult and Dislocated Worker Program clients based on the provider of services analyzes employment and wage outcomes of clients and provides information for program administrators to target areas for improvement.

As time, funding, and resources permit, R&A staff will continue with further evaluations. Evaluations using state UI wage records can inform internal policies, assist program clients with decision making, and provide information for targeted improvement projects.

Montana is also working to expand data sources available for wage matching. In the past several years, the Department has established MOUs for the sharing of data with two private colleges in Montana, several tribal colleges (for limited data), the Office of the Commissioner of Higher Education, and the Montana Department of Revenue. The colleges share PII with the Research and Analysis Bureau, who in turn matches this information with wages and locations when the student becomes employed. The information is then summarized and can be given back to the college. While data sharing exists, the Department makes sure that only summary and aggregate data is shared and no UI related PII is given directly to any entity. These relationships have allowed the Department to provide better research on our workforce system. The Department is working to improve data sharing with the K-12 system.

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**(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 (GEPA) (20 U.S.C. 1232g) and other applicable Federal laws.

Montana follows the guidance on handling and protection of personally identifiable information (PII) provided in TEGL 39-11. Social Security Numbers, in most fields in the MWorks automated system have been replaced with client identification numbers. Social Security Numbers have been removed from printouts in MWorks and staff have been trained to protect PII in paper form and in the transfer of PII across programs. Additional security measures regarding the system are in place and are evaluated on a continual basis

**(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 DOL. States should also describe the referral process for veterans determined to have a significant barrier to employment to receive services from the SVSG program's DVOP specialist.

Montana's Jobs for Veterans State Grant (JVSG) funds nine Disabled Veterans Outreach Program (DVOP) Specialists and one Veterans Intensive Service Coordinator. Priority of service is given at all service provider offices to special disabled, other disabled and other eligible veterans in accordance with priorities determined by the U.S. Secretary of Labor. The current qualifications include:

- Disabled veterans receiving or have filed for VA compensation (or but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans' Affairs; or who were discharged or released from active duty because of a service-connected disability;
- Veterans that are homeless or at risk of being homeless;
- Veterans separated from service within the last three years and, at any point in the previous 12 months, have been unemployed for 27 or more consecutive weeks;
- Veterans that have ever been incarcerated;
- Veterans without a high school diploma or equivalent certificate;
- Veterans that fall below the poverty line for the area in which they reside;
- Veterans between the ages of 18 and 24 years' old;
- The spouse of a service member who died of a service-connected disability, has been missing in action for more than 90 days, captured in the line of duty by a hostile force for more than 90 days, forcibly detained or interned in the line of duty by a foreign government or power for more than 90 days, or who has a total disability that is permanent in nature resulting from a service-connected disability or who died as a result of a service-connected disability;
- A family member (parent, spouse, child, stepfamily member or other that live with but are not a member of the family) that provide personal care services to an eligible veteran.

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Priority of Service for Veterans has been implemented through training of the staff in service provider offices that all Veterans receive Priority of Service. It is monitored by the VETS program through the audit process and by the Program Manager through office checks.

The JVSG referral process to a DVOP begins in s a Job Service office and is accomplished by the completion of the intake form when a Veteran or eligible spouse is identified upon entry. The intake form is not completed by the DVOP. If a Veteran or eligible spouse is determined to have a qualifying Significant Barrier to Employment (SBE) they are referred to the DVOP.

#### **(8) ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM:**

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 (ADA) 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. (This Operational Planning element applies to core programs.)

The state of Montana certifies its One-Stop system no less than once every three years and that certification includes scoring on universal accessibility and outreach to populations with barriers. The state's One-Stop Certification Policy is located here: <https://wsd.dli.mt.gov/docs/wsd-policy/one-stop-cert-.pdf>.

In addition to the state's One-Stop Certification, the state's Equal Opportunity (EO) Officer visits each service provider to thoroughly evaluate sites based on the US Department of Labor's EO monitoring instrument ADA Checklist for Existing Facilities. The checklist is located here: <https://www.ada.gov/rachek.pdf>. Sites that are out of compliance with ADA standards are required to submit a compliance plan and timeline for implementation.

Programmatic accessibility is also monitored by the state's Equal Opportunity Officer who designed a monitoring instrument with input from other states and the US Department of Labor's Civil Rights Center. The instrument addresses programmatic accessibility and universal access to services provided in Montana's One-Stop System. In addition to monitoring for accessibility, the Equal Opportunity Officer designs training for service providers and continually looks for additional resources to support a fully integrated and accessible One-Stop System.

In addition to monitoring the physical locations and programmatic accessibility in Montana's One-Stop System, the Equal Opportunity Officer reviews data and statistics about customers using Montana's public workforce system. The data is reviewed to

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ensure providers are equitably serving populations throughout the state. Specific populations include, but aren't limited to:

- Women;
- Minorities;
- Age groups; and
- Those who self-report disability.

**(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.

The Research and Analysis Bureau of the Department of Labor & Industry conducted an analysis of the languages spoken in Montana using the 2010 census on Population and Housing and the 2000 Montana census data on selected demographic characteristics. This analysis showed Spanish as the third predominant language with the Native North American language second and English first. The analysis shows that those that speak the Native North American language speak English outside the household where the Spanish-speaking individuals do not speak English outside the household. Based on this information, Montana posts notices in English and Spanish throughout the One-Stop System.

The state provides equal access programs to persons of limited English-speaking ability and provides translation services. Universal access is provided through various bilingual services including, but not limited to, Language Line and other approved internet access sites provided in one-stop centers and service providers sites located across the state. Individuals seeking or receiving WIOA services may (but are not required to) provide their own interpreters. However, as this may become a confidentiality issue, Montana's WIOA service providers make every attempt possible to provide interpreters for those non-English speaking individuals seeking workforce services. The State Equal Opportunity Officer surveyed services providers throughout Montana for resources available to provide interpretative services to those with limited English-speaking abilities. The state is aware of, and uses, the following interpreter resources:

- The Montana United Indian Alliance;
- Montana's University System;
- Approved language websites;
- Language Line; and
- Private interpreters across the state.



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### IV. COORDINATION WITH COMBINED STATE PLAN PROGRAMS

If the State is submitting a Combined State Plan, describe the methods used for joint planning and coordination of the core programs and the other programs and activities covered by the Combined State Plan.

The state of Montana's goals and vision are centered around the further development of an aligned, accessible, and accountable public workforce and talent development system. Coordination and planning across core programs and other partners occur at the state level, and additional collaboration and coordination happen at the local level with core and community-based partners.

Statewide leadership, guidance, and collaboration have established the foundation of an integrated public workforce and talent development system, and the state of Montana intends to build on that foundation by implementing the following strategies:

- Data alignment through system development;
- Cross training across partners; and
- Coordinated and strategic business engagement.

#### **DATA ALIGNMENT:**

All core programs currently use LMI to serve clients and ensure that training and career development strategies are aligned to industry needs in the area. The common use of LMI to serve businesses and individuals in Montana's public workforce and talent development system allows for seamless service delivery across programs to help individuals transition into training, education, or employment and develop talent to support business and economic growth.

#### **CROSS TRAINING ACROSS PARTNERS:**

The state of Montana will continue providing training opportunities at the state and local level for partners to learn about partner programs and how the programs can work together to best serve clients in the public workforce and training system. Cross training will build a better understanding of partner programs and allow for seamless service delivery across partners and ensure that programs aren't duplicating efforts. In addition, a better understanding of core programs will allow partners to establish common regional goals and strengthen relationships with other partners to better meet regional economic needs.

#### **COORDINATED AND STRATEGIC BUSINESS ENGAGEMENT:**

The state of Montana will continue growing its statewide business engagement strategy by coordinating across partners at the regional level to meet business challenges and ensure continued economic growth. In addition, the state of Montana will work on the following:

- Develop an education strategy for partners on the assessment of data to understand business cycles to proactively assist businesses and help with layoff aversion before a rapid response event;



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- Grow sector strategies and partnerships at the state and regional level to identify skills, credentials, and education required for occupations within sectors; and
- Work collaboratively across partners to identify education and training partners that are able to work with clients to develop the skills and attain the training necessary to succeed in the workforce.

### V. COMMON ASSURANCES

#### THE 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;
- (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;
- (3) The lead State agencies with 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;
- (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 CEOs, businesses, labor organizations, IHE, the entities responsible for planning or administering the core programs and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, 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 UI Agency if such official(s) is a member of the State Board;
- (5) The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for adult, DW, and youth programs to carry out workforce investment activities under chapters 2 and 3 of subtitle B;
- (6) The State has taken the appropriate action to be in compliance with WIOA section 188, as applicable;
- (7) 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;
- (8) 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;

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- (9) The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the ADA of 1990;
- (10) Service providers have a referral process in place for directing Veterans with SBE to DVOP services, when appropriate; and
- (11) The State will conduct evaluations and research projects on activities under WIOA core programs; that 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, that the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA.
- (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 DOL.

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

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

#### **ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES UNDER TITLE 1-B**

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

##### **(a) GENERAL REQUIREMENTS**

##### **(1) REGIONAL AND LOCAL WDAS:**

##### **(A) Identify the regions and the local WDAs designated in the State**

In order to best serve Montanans and meet the workforce needs of the state, Montana operates under a waiver as a single workforce planning area. Given the state's vast geography, low population and tri-agency structure housing the WIOA core programs, each partner issues policy to their local service sites. However, with the passage of WIOA, the core partners; health and human services, education, and economic development partners are working together to ensure that services are coordinated and aligned; including participation in partner conferences and joint strategy and planning activities.

The resolution of Montana's CEP/BOS issues requires that Montana maintain the original boundaries of the CEP. Therefore, funding for adult, dislocated worker, and youth programs does take into account the local area in its allocation. The SWIB serves as both the local and state board for all statewide planning purposes.

Through integrated partnerships with business, education, community leadership, and workforce programs, Montana core partners participate in Community Management Teams (CMTs), which serve as the state's local workforce organizations. Montana currently has 19 active CMTs, which were originally developed as a group of one-stop

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partners, community members, local businesses, economic development representatives, and other community-based partners. The groups have elected officers and meet on a monthly or quarterly basis. The CMTs identify community needs and work together to plan needed workforce development and partner services to meet the community's specific needs.

In order to best meet regional workforce needs, the state allocates funding using 12 regions outlined by the Montana Association of Counties (MACo). County commissioners and other local leaders are encouraged to participate on CMTs to ensure the local workforce needs are met and understood by those working to train the workforce.

**(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 CEOs in identifying the regions.

The State of Montana is a single-area planning state and operates as such under a waiver from USDOL which allows the SWIB to serve as both the local and state board. Montana recognizes a prior-designated 10-county area formed under WIA through the Concentrated Employment Program (CEP) and the remaining 46 counties as separate local areas for funding purposes. However, the state continues to plan and coordinate workforce development activities statewide.

All service delivery planning and strategic visioning occurs at the state level with local input through service delivery partners and the SWIB. For the purpose of statewide planning, the Montana Labor Market Information (LMI) team collects and provides current labor market data and analysis related to economic conditions for the various workforce regions. The data includes existing and emerging in-demand industry sectors and occupations; and the potential needs of Montana employers. For in-demand industry sectors, initiatives are implemented through a statewide network of business engagement specialists.

All administrative funding, service delivery coordination, policy development and federal reporting occur on a statewide level. With a large geographic state that includes vast remote areas, the service delivery across the state benefits from statewide planning. As such, Montana has designated the entire state as one planning region.

Montana continues engagement with local elected officials and associations representing counties and municipalities throughout the state on workforce development issues. In addition, the SWIB membership has local elected officials who

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engage statewide with MACo and nationally with NACo on local workforce development issues and trends.

Montana also has policies and procedures in place for local governments to submit requests for local area designation. Should the state receive a request for local area designation the application will go to the SWIB and the governor for consideration. The application requests an analysis of local labor market needs, economic development needs, and an assurance that the applicant has access to federal and nonfederal resources to administer activities required under WIOA.

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

At the time of submission of this plan, the SWIB had not received any requests for a designation of a local workforce area. Should the SWIB begin receiving requests for local workforce area designations it will develop an appeals process in accordance with 106(b)(5) of WIOA.

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

The state of Montana includes its appeal and dispute resolution process for infrastructure funding within its partner memorandum of understanding it reads as follows:

Dispute and Impasse Resolution for IFA: All parties will actively participate in IFA negotiations in a good faith effort to reach agreement. Any disputes shall first be attempted to be resolved informally. Should informal resolution efforts fail, the process outlined in the “Dispute Resolution” section above must be followed. If partners have employed the dispute resolution process and have failed to reach consensus on an issue pertaining to the IFA, then an impasse is declared, and the State Funding Mechanism is triggered.

- Step 1: Notice of Failure to Reach Consensus Given to Governor: If the parties cannot reach consensus on methods of sufficiently funding an American Job Center’s (AJC) infrastructure costs and the amounts to be contributed by each partner program, the SWIB (or designee) is required to notify the governor.
- Step 2: Negotiation Materials Provided to Governor: The SWIB Chair (or designee) must provide the appropriate and relevant materials and documents used in the negotiations to the governor, preferably at the time of the notification of failure to reach consensus, but no later than 5 business days thereafter. At a minimum, the SWIB Chair (or designee) must provide to the governor:
  - The State Plan;
  - The cost allocation methodology or methodologies proposed by the partners to be used in determining the proportionate share;
  - The proposed amounts or budget to fund infrastructure costs;
  - The amount of partner funds included;
  - The type of funds (cash, non-cash, and third-party in-kind contributions) available (including all documentation on how partners valued non-cash and third-party in-kind contributions consistent with 2 CFR 200.306);

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- Any proposed or agreed on AJC budgets (for individual centers or a network of centers); and
- Any partially agreed upon, proposed, or draft IFAs.
- The SWIB (or designee) may also provide the governor with additional materials that they or the governor find to be appropriate.
- **Step 3: Governor Determinations and Calculations:** The governor will:
  - Determine AJC infrastructure budget(s);
  - Establish cost allocation methodology(s);
  - Determine Partners' proportionate shares;
  - Calculate statewide cap;
  - Assess the aggregate total of infrastructure contributions as it relates to the statewide cap; and
  - Adjust allocations.
  - Once all determinations and calculations are completed, the governor will notify the SWIB Chair (or designee) of the final decision and provide a revised IFA for execution by the parties.
- **Step 4: IFA Execution:** The IFA becomes effective as of the date of signing by the final signatory. Programs may appeal the governor's determination of the infrastructure cost contributions in accordance with the process established under 20 CFR 678.750, 34 CFR 361.750, and 34 463.750.

### **(2) STATEWIDE ACTIVITIES:**

- (A)** Provide State policies for guidance for the statewide workforce development system and for use of State funds for workforce investment activities.

The state of Montana provides policy guidance governing the state's public workforce and talent development system in compliance with all local, state, and federal laws. The state statute that governs the state's Department of Labor are contained in Title 39 of the Montana Code Annotated. All WIOA policies are posted online here:

<http://wsd.dli.mt.gov/wsd-policy#WIOA-2385>.

- (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.

Montana is a minimally funded state as it relates to WIOA funding. As such, most of the governor's set aside funding is used to cover costs directly attributed to program operations and compliance, including but not limited to SWIB board and program fiscal administration, program monitoring and compliance and PIRL reporting and process and data systems maintenance.

What remains, approximately \$200,000, is used to support specific initiatives identified and/or championed by the governor. Currently this funding is being directed to a few efforts that include: a Tribal School computer coding program; training costs for

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students who started a post-secondary degree program through the Montana University System but did not graduate and who are not eligible for services under WIOA; and helping lead a statewide work-based learning collaborative effort.

The state of Montana relies on local relationships within the business and economic development communities to identify businesses at risk of or in the process of downsizing or closing. As those potential layoff events are identified, the Montana Department of Labor & Industry coordinates a local response with providers to eliminate or reduce the impact of the layoff of those impacted.

The state of Montana continues to engage the U.S. Department of Labor on the development of a policy and funding framework that allows states to proactively coordinate and support businesses that will experience a downturn leading to layoffs.

**(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.

In the event of a disaster declaration, DLI coordinates with the Governor's Office, FEMA and appropriate state agencies to deliver Rapid Response services to businesses and workers impacted by the disaster. During a disaster declaration, the Rapid Response services are coordinated through Job Service Operations Bureau and local office staff coordinate with the Rapid Response team to provide information and services to impacted workers. Team members are assembled to meet the community and individual needs of the impacted workers.

**(D)** Describe how the State provides early intervention (e.g., Rapid Response) to worker groups on whose behalf a TAA petition has been filed. (Section 124(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 are transparent to the trade-affected DW 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.

In Montana, trade-impacted workers receive Trade Adjustment Assistance (TAA) information and services through Rapid Response, Dislocated Worker, and Wagner-Peyser programs. These programs are operated statewide by DLI. Field staff coordinate all Rapid Response Activities, help businesses or workers file TAA petitions, and bring a variety of state and local service providers together for inter-agency Rapid Response workshops.

Co- enrollment of TAA clients in the WIOA Dislocated Worker program - as well as in other programs for which they are eligible - is the standard approach in Montana. State policy requires assessment to develop an appropriate Individual Employment Plan and TAA services, including determination of need and justification for TAA-approved

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training. In addition to structured interviews, case manager's use a variety of formal assessment tools, including (but not limited to):

- Education assessments designed by the Adult Education Program;
- Assessments within the Montana Career Information System; and
- ESkill proficiency tests.

Rapid Response services are provided to all workers experiencing layoffs. During the Rapid Response workshop, staff informs workers of the following services available to them:

- How to start a UI claim;
- Title I workforce services available to them;
- TAA benefits; and
- Community resources.

After the Rapid Response workshop and once staff is aware of the TAA petition they share additional program information and assist the impacted workers one-on-one to provide information about benefits and services offered through the program.

Additionally, Montana recently procured the Dunn & Bradstreet "EconoVue" tool that follows real-time business activity and operating signals to help staff determine what businesses are demonstrating in-the-moment growth characteristics or showing signs of contraction or declining. DLI intends to use this tool to help strengthen and support the TAA program, Rapid Response events, and overall Montana business engagement.

### **(b) ADULT AND DISLOCATED WORKER PROGRAM REQUIREMENTS**

**(1) WORK-BASED TRAINING MODELS:** If the State is utilizing work-based training models (e.g. OJT, 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.

The state of Montana supports on-the-job training (OJT) as an important training service for WIOA clients to receive the skills necessary to transition into meaningful employment. Work-based training provided to Montanans using WIOA funds must be designed for higher skilled occupations and are not designed to subsidize low-skilled occupations that require little training time.

Prior to the establishment of an OJT contract, employers are screened to ensure the job provides a wage that meets the participant's needs and to ensure the employer meets all regulatory aspects to be eligible for OJT funds. The length of OJT training is determined through research of the O\*Net system to identify the complexity of the specific job in conjunction with the participant's current level of skill in that occupation.

The Incumbent Worker Training Program is a competitive grant that provides funding to help eligible Montana businesses with less than 50 employees statewide purchase



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skills-based training for current (incumbent) workers residing in Montana. Training can be customized to meet specific employer needs. The training must be skill-based or result in a certificate or credential, and must improve the productivity, efficiency or wages in the workers' existing jobs. Training should be short-term and the business must have a demonstrated need for the training as a way to remain competitive in their industry or the global economy.

**(2) REGISTERED APPRENTICESHIP:** Describe how the State will incorporate Registered Apprenticeship into its strategy and services.

Montana's Registered Apprenticeship program has staff based in different job service offices that work regionally to serve the entire state. Those representatives participate in weekly staff meetings with WIOA program managers. In addition, Montana's Registered Apprenticeship program includes WIOA program managers in its outreach efforts and works to identify apprentices that may be eligible for WIOA programs to ensure successful completion of a registered apprenticeship program.

In addition to the colocation of the staff at job service offices, the state registered apprenticeship program provides staff, resources, and outreach to larger statewide workforce engagement, which may include participation in rapid response efforts and coordination with the dislocated worker program.

Montana's registered apprenticeship program also coordinates with partners in conducting outreach and program design on Montana's seven Indian reservations. The program anticipates continued growth statewide and its working to cultivate additional relationships with employers and industry associations in order to grow occupations and increase the capacity for apprentices.

Furthermore, a recent revision to Montana's apprentice-to-journeyman ratio – allowing one journeyman to oversee the training of two apprentices – creates additional opportunities for workers to train in the skilled trades and increases an employer's ability to offer apprenticeships.

**(3) TRAINING PROVIDER ELIGIBILITY PROCEDURE:** Provide the procedure for determining training provider eligibility, including Registered Apprenticeship programs (WIOA Section 122)

All Montana registered apprenticeship sponsors are automatically eligible for inclusion on Montana's ETPL. Each sponsor has the opportunity to opt-in for inclusion on the list and are provided information about possible WIOA benefits to their apprentices if they opt-in to the ETPL.

**(4)** Describe how the State will implement and monitor priority for public assistance recipients, other low-income 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.



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The state of Montana implemented the additional adult priority of service for individuals who are basic skills deficient in July of 2015. Priority of service requirements are reflected in the Title I Adult and Dislocated Worker Program Policy, which is located on the Workforce Services Division's policy site here: <http://wsd.dli.mt.gov/wsd-policy#WIOA-2385>.

The state of Montana monitors each service provider once a year and this includes monitoring for priority of service for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient. Monitoring includes a review of documentation in participant files reflecting that individuals fit the priority of service requirements and that all required documentation proving the priority is in place. All WIOA Title I Adult participants must meet one of the *priority of service* categories in order to receive services.

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

Montana's Dislocated Worker funds are contracted by the SWIB to one service provider that provides services throughout the state to both local areas. Funds are not restricted by MACo district and can be used in each area based on need. Montana does not allow for transfer of funds between the Adult and Dislocated Worker programs. Montana's WIOA Funding Allocation Policy is located here: <http://wsd.dli.mt.gov/wsd-policy#WIOA-2385>

**(c) YOUTH PROGRAM REQUIREMENTS:** With respect to youth workforce investment activities authorized in section 129 of WIOA:

- (1)** Identify the state-developed criteria to be used by local boards in awarding grants 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.

The State of Montana issues RFPs for the WIOA Title I Youth Program in accordance with federal and state procurement law. Montana's SWIB serves as both the state and local board under a waiver and the Management Services Division under the Montana Department of Labor & Industry serves as the administrative entity for the SWIB and issues the RFPs on behalf of the board. The RFPs are awarded to the 12 MACo Districts throughout the state, which are within Montana's two local areas; a map of the MACo Districts is here: <http://www.mtcounties.org/events/maco-district-meetings/>. Providers competitively bid for the RFPs and there are currently 10 providers serving both local areas and all 12 MACo Districts. The criteria for the WIOA Title I Youth Program is developed in coordination with the board and encompasses all the program requirements as set by the US Department of Labor.

The state of Montana developed criteria for grant awards including, demonstrated effectiveness of serving youth populations, financial stability, fiscal accountability, cost

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effectiveness, local factors, qualifications, and expertise of staff, and demonstrated linkages with other youth services providers, schools and employers.

WIOA Title I Youth providers are monitored annually for performance and accountability. The performance measures are set by the US Department of Labor, and the state of Montana includes indicators within its Youth Policy located here:

<http://wsd.dli.mt.gov/wsd-policy#WIOA-2385>.

In addition to the US Department of Labor performance indicators, the SWIB set out additional performance indicators, which include:

- Measuring cost per participant, which the board capped at \$5,980
- Measuring the number of participants in training, which is above US Department of Labor's requirements.

**(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, and Combined State Plan partner programs included in this plan, required and optional one-stop partner programs, and any other resources available.

WIOA Title I Youth service providers coordinate services for out-of-school youth with a number of partners including, but not limited to:

- Adult Education (statewide)
- Vocational Rehabilitation (statewide)
- Adult Title I programs (statewide)
- Jobs for Montana's Graduates (statewide)
- Juvenile justice and probation programs (statewide)
- Public assistance programs, including, but limited to:
  - Supplemental Nutrition Assistance Program (SNAP) (statewide); and
  - Temporary Assistance for Needy Families Program (TANF) (statewide)
- Youth homeless and runaway programs (statewide, though programs vary in scale throughout the state)
- Post-secondary education (statewide)
- YouthBuild (MACo District 8)
- Job Corps (MACo District 12 and District 10)
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In addition to coordination of services with partners, WIOA Title I Youth service providers also refer participants to partner programs and offer supportive services to participants to help ensure youth are supported throughout training or degree attainment. In addition to WIOA Title I Youth funds service providers also braid funding streams from other youth-based programs and community-based partnerships supporting disadvantaged youth.

WIOA Title I Youth providers have strong relationships with education systems within the district it serves. These relationships are critical as educators, principals, superintendents, and career and guidance counselors have established relationships with students and help caseworkers both target out-of-school youth and help participants transition back into education systems as appropriate.

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**(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.**

WIOA Title I Youth providers ensure that all 14 program elements are available to participants; however, providers have discretion of determining what specific elements are provided based on the individual objective assessment and individual service strategy developed with the participant. In order to ensure there isn't duplication of service, providers coordinate with partners in their area whenever possible to best support the participant.

The state of Montana requires a provider agreement that includes scope of services detailing how the provider will ensure the 14 program elements are successfully delivered to participants based on need. The state of Montana monitors each provider annually to ensure the services are provided. In addition, the state of Montana includes the 14 program elements in its youth policy.

**(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).**

**In-School Youth:** A youth (14-21) who requires additional assistance to: Complete an educational program: a youth who is at risk of dropping out of high school as documented by his/her school; or had previously dropped out of an educational program but has returned to school (including an alternative school); has below average grades; or a youth with poor attendance patterns in an educational program during the last 12 calendar months; or has been suspended or expelled from school within the last 12 calendar months; or has previously been placed in out-of-home care (foster care, group home, or kinship care) for more than 6 months.

OR

**Secure or hold employment:** an in-school youth who has not held a job for more than three consecutive months; or has a poor work history to include no work history; or has been fired from a job in the last 6 calendar months; or lacks work readiness skill necessary to obtain and/or retain employment.

**Out-of-School Youth:** A low-income youth (16-24) who requires additional assistance to: Enter or complete an educational program: a youth who is in need of a high school diploma; or has dropped out of a post-secondary educational program during the last 12 calendar months; or has a diploma but requires additional education in order to obtain or retain employment.

OR

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Secure and hold employment: a youth (including a youth with a diploma or equivalent) not currently attending any school and who has not held a full-time job for more than three consecutive months; has a poor work history, to include no work history; has been fired from a job in the last six calendar months; or lacks work readiness skills necessary to obtain and/or retain employment.

**(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.

Montana defines attending school as youth 7-16 that are enrolled in and attending school full-time. Youth that are home schooled or enrolled in a private school are considered to be “attending school” if they have registered or provided notification to the Superintendent within their county of their intent to be considered a school. “Not Attending School” youth under 16 and not attending school are considered to be truant; a youth 16 and over not attending school are considered to be a “drop-out.”

**(6)** If not using the basic skills deficient definition contained in WIOA Section 3(5)(B), include the State Definition.

- (A) Montana uses the basic skills deficient definition contained in WIOA Section 3(5)(A).
- (B) BASIC SKILLS DEFICIENT – The term “basic skills deficient” means, with respect to an individual –
- (C)(A) Who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test.

**(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 CEO. 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 also include:

- (1)** Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)
- (2)** The entity responsible for the disbursement of grant funds, as determined by the governor, if different from that for the State. (WIOA section 108(b)(15).)
- (3)** The type and availability of WIOA title I Youth activities, including an identification of successful providers of such activities. (WIOA section 108(b)(9).)

Not applicable.

**(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:

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Montana respectfully submits the following waiver requests as part of its 2020 Combined State Plan modification.

Waiver Request #1 – WIOA Section 107(b) to allow a state board to carry out the roles of local boards for a Single Statewide Planning Area structure.

(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;

Montana is formally seeking a waiver to permit the state workforce board to carry out the functions of local boards. This waiver request is for a renewal of a waiver previously applied via 20 CFR 679.310(f) which states that a state board may carry out the roles of a local board when the State Plan indicates that the State will be treated as a local area under WIOA. WIOA Section 107(c)(4) also directs a state board for a single state local area to carry out the functions of the local board. The State Workforce Innovation Board has acted as both the state and local board under WIA since January 1, 2006. This structure will be (re)reflected in the Combined State Workforce Plan.

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

No state or local statutory or regulatory policies limit the governor's authority to allow the state to continue operating as a single statewide planning area.

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

The primary goal of this waiver is to limit annual overhead and maximize the amount of funds made available for direct services to individual and business customers. The programmatic outcome is to serve the largest number of participants possible with the funding available.

To maximize resources available for direct service delivery, the state will continue to use the State Workforce Innovation Board as the local workforce board. When initially implemented, this saved the state WIA program approximately \$1.2 million by removing administrative overhead of maintaining multiple regions throughout the state.

As evidenced since its initial implementation, the single statewide planning structure has reduced annual overhead and maximized available funding for training and direct customer services.

This statewide structure enhances efforts to transform the system into a demand driven system and directly supports the importance of local community partnerships. The 16 Montana Job Service offices serve as the state's American Job Centers offering the full range of workforce development services.

## STATE OF MONTANA WIOA COMBINED STATE PLAN

(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.

The Statewide Workforce Innovation Board was put in place prior to WIOA, and its current membership aligns with the statutorily prescribed composition of WIOA. This includes a majority representing private business and others representing education, public health and human services, labor, elected officials, and community-based entities. Additionally, State of Montana education policy is aligned with state and workforce development goals. The single statewide planning area structure allows Montana to continue successful policies and operations that maximize cooperation, engagement and service delivery in all aforementioned areas.

(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;

The initial change to a single statewide planning area structure, in conjunction with this waiver, provides Montana a structure that ensures more people are served than if there were multiple administrative areas splitting minimal funding. Additionally, it allows the State to continue to serve at least the same number of customers of all types, despite reduced and/or level funding over recent years.

(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.

As evidenced since its initial implementation, the single statewide planning area structure has reduced annual overhead cost, strengthened administrative oversight and accountability, reduced potential for disallowed costs, and enabled more funds to go to participants. Montana continues to emphasize a minimum 50% of all WIOA funds go to direct services. This and other program goals are reviewed quarterly.

A 30-day public comment period was provided by including this waiver as part of Montana's WIOA Combined State Plan that was posted for public comment and noticed to interested parties such as all SWIB members, the SWIB Interested Persons list, the Montana Association of Counties, the Montana League of Cities and Towns, local elected officials, service providers, organized labor and other partners of the workforce system.

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The process and notification of interested persons through email is aligned with State of Montana public meeting laws and Montana Department of Labor & Industry policy.

The impact of this waiver to the state's WIOA performance, as well as any other related outcomes, will be collected and reported in the state's WIOA Annual Report.

(7) Provides available data about outcomes resultant from previously approved waiver;
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Waiver Request #2 – Reallocation Waiver

### **1. The statutory and/or regulatory requirements the State would like to waive**

DLI is seeking a waiver from the provisions of WIOA §128(c)(3) and §133(c) regarding reallocation among local workforce providers/areas. This waiver would provide flexibility to DLI in redistributing funds among local workforce providers/areas (herein referenced as program operators).

### **2. Actions the State has taken to remove state or local barriers**

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

This waiver would provide DLI the flexibility to redistribute recaptured funds to workforce program operators where the greatest potential may be realized, thus ensuring more effective and more efficient use of federal funds. DLI will continue to apply this strategy and monitor outcome success.

If approved, DLI will enact a deobligation/reallocation policy to establish consistent procedures for funds administered in support of the workforce development system.

- Deobligations will be required to pass a multilevel review process:
  - Expenditures are reviewed quarterly (performance is also considered).
  - If expenditures are trending low, staff provides technical assistance to the program operator.
  - Program operators are given an opportunity to get expenditures back on track.
  - When it becomes clear that a program operator will not be able to meet the expenditure benchmark, discussion regarding the possible deobligation occurs and we receive concurrence from the program operator that they will not be able to use the funds.
- Reallocations will also be required to pass a multilevel review process:
  - Expenditures are reviewed quarterly (performance is also considered).
  - If expenditures are trending high, staff provides technical assistance to the program operator:
    - Program operators are given an opportunity to explain why expenditures appear to be high.
    - Program operators may identify that the numbers of participants

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to be served is higher than anticipated and additional funds are needed.

- Staff verifies through the performance reports that the number of participants is consistent with the program operator's explanation of need.

This process for reallocation would be used for WIOA funds upon approval of the waiver.

### **3. State strategic goal(s) and Department of Labor priorities (e.g., expansion of apprenticeship, improved employer engagement, etc.) supported by the waiver**

DLI requests this waiver of the WIOA statutes relating to the redistribution of recaptured local funds and proposes to base the redistribution of WIOA funds on DLI's existing program allocation rules. DLI ensures that financial reporting will be consistent with current DOLETA requirements and that federal funds will be effectively managed for maximum service provision and program performance.

Approval of this waiver request would help DLI meet the following goals:

- **Redistribution of recaptured funds to program operators based on factors established by DLI to ensure that funds are redistributed to workforce areas with the greatest need:** DLI will determine the amounts to be redistributed to workforce areas based on factors such as:
  - requested amount;
  - demonstrated need for and ability to use additional funds to serve low-income individuals, public assistance recipients, dislocated workers, and unemployment insurance claimants;
  - demonstrated capacity to expend the formula funds;
  - an established plan for working with targeted industry sectors and
  - performance in the current and prior program years.
- **Facilitation of maximum expenditure of recaptured federal funds:** DLI seeks to redistribute workforce funds to program operators that have achieved both targeted expenditure levels and established performance targets.
- **Improvement of administrative efficiencies:** Approval of this waiver will serve to minimize administrative processes that support effective workforce system integration.

### **4. Projected programmatic outcomes resulting from implementation of the waiver**

The statutory reallocation requirements can be fulfilled; however, the amount of funds available for reallocation may be so small that it is cost prohibitive. By using DLI's existing allocation rules for the redistribution of funds, DLI can ensure that federal funds will be more effectively and efficiently managed for maximum service



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provision and program performance. Approval of this waiver may not result in significantly higher performance outcomes, but it will provide the opportunity for recaptured funds to be redistributed to program operators where the greatest potential impact may be realized. It will also streamline administrative practices, allowing for greater efficiency in meeting workforce development needs of employers and job seekers and enhance the quality of overall services.

### **5. Individuals, groups, or populations benefiting from the waiver**

Program operators that provide quality services will have access to additional resources to meet the employers' needs, job seekers, and incumbent workers. Additionally, the waiver will allow DLI to continue to promote the cost benefits of improved administrative efficiencies, encouraging the increased leveraging of resources by program operators. As a result, DLI will increase employment and training opportunities for disadvantaged populations and individuals with multiple barriers to employment.

### **6. How the State plans to monitor waiver implementation, including collection of waiver outcome information**

If approved, DLI will develop a policy to communicate the waiver allowance to workforce program operators. DLI will also monitor progress under this waiver by reviewing quarterly performance reports and through its monitoring system. DLI will report waiver usage and outcomes in the state's WIOA Annual Report.

### **7. Assurance of State's posting of the request for public comment and notification to affected Local Workforce Development Boards**

DLI included this waiver request as part of its 2022 WIOA Combined State Plan Modification public comment request.

## TITLE I-B ASSURANCES

### **THE STATE PLAN MUST INCLUDE ASSURANCES THAT:**

- (1) The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of career and training services to individuals who are low-income, public assistance recipients or basic skills deficient;
- (2) The State has implemented a policy to ensure local areas have a process in place for referring veterans with SBE to career services provided by the JVSG program's DVOP specialist;
- (3) The State established a written policy and procedure that set forth criteria to be used by CEOs for the appointment of local workforce investment board members;
- (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);

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- (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;
- (6) The State established a written policy and procedure for how the individuals and entities represented on the State WDB help to determine the methods and factors of distribution, and how the State consults with CEOs 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);
- (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;
- (9) If a State WDB, department, or agency administers state laws for VR of persons with disabilities, that board, department, or agency cooperates with the agency that administers WP services, Adult and DW programs and Youth Programs under Title I;
- (10) Priority of service for covered persons is provided for each of the Title I programs; and
- (11) The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.
- (12) The State has taken appropriate action to secure compliance with 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);

## WAGNER-PEYSER ACT PROGRAM

### WAGNER-PEYSER ACT PROGRAM (EMPLOYMENT SERVICES)

#### (a) EMPLOYMENT SERVICE PROFESSIONAL STAFF DEVELOPMENT:

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

Staff receive ongoing training on all Wagner-Peyser program services. Training is provided face-to-face, via webinar and/or recorded and stored online for staff to view at their convenience. Wagner-Peyser staff are cross-trained on all programs to maximize staff availability and ensure that job seekers and employers receive the best possible services. Each office has subject matter experts who train each other and conduct cross-training in staff meetings. All staff understand WIOA Title I, Title II and Title IV basic program eligibility criteria and how to make referrals to partner programs. Online tools available for use by Wagner-Peyser staff during job seeker intakes and assist staff in identifying possible referral options including those to WIOA required partners.

The following training sessions are available to field staff at least annually:

- Business Services;

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- WIOA Technical Assistance (monthly);
- Veteran Services; and
- Migrant Seasonal Farmworker Services and H2A/H2B employer services.

When staff identify training needs, specialized training is developed and delivered, or training is identified and provided externally. Recent specialized training was delivered on assisting ex-offenders, business outreach, client intake, continuum of service to clients, documenting services delivered to job seekers and businesses, and Unemployment Insurance (UI) Services, Reemployment Services and Eligibility Assessment (RESEA) training.

RESEA training is provided to all Wagner-Peyser staff and covers basic UI eligibility requirements, issue identification, fact-finding tools, and UI work search requirements. In addition, Wagner-Peyser staff receive ongoing training opportunities, such as the required RESEA appointments to provide basic and individualized Wagner-Peyser services to job seekers and UI claimants.

Montana's Wagner-Peyser staff provide customized business services designed to increase work-based learning opportunities such as registered apprenticeship, WIOA Title I-funded on-the-job training, and Incumbent Worker Training. Montana Wagner-Peyser staff connect local businesses to the Montana Registered Apprenticeship Program. In addition, Montana seeks opportunities to help employers increase productivity, employee engagement, employee recruitment, retention, and training by implementing new programs and pilot projects.

**(2) Describe strategies developed to support training and awareness across core programs and the 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.**

At least annually, WIOA staff must complete training created by both UI and WIOA Program Managers. This training includes topics such as RESEA appointments, basic concepts of "able and available," benefit eligibility, documentation requirements and job- and union-attached claimants. Referrals of claimants to UI for adjudication as well as reporting of potential issues are also discussed in the UI training.

**(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.**

Montana provides direct access to a UI representative in all workforce centers and an online portal for UI claimants is available on the department's website that provides claimants with self-service functions.

Workforce Consultants throughout the state are trained to provide general assistance and information to customers regarding the processes around filing for unemployment

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compensation. Questions that require specific UI expertise are referred to the UI Claims Center for response.

From March 2020 through July 2021 almost all local workforce staff functionally transitioned into a UI claims support role. This was necessary to help DLI meet the instant and prolonged demand for UI services as well as practical given the physical access to workforce centers by UI claimants unable to manage technology and other challenges. To a degree some of those staff are continuing in such a role.

<b>(c) Describe the State's strategy for providing reemployment assistance to UI claimants and other unemployed individuals.</b>
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Job Service staff work with all UI claimants, except for job or union-attached claimants. In order to receive UI benefits, claimants must register with Job Service online or in-person within 10 days of filing a claim.

The state of Montana serves claimants in declining industries, ex-military claimants, and those at risk of becoming long-term unemployed through RESEA. The program includes:

- an orientation to services available at the office;
- a comprehensive assessment of the claimant's current situation and development of an individual employment plan, which includes:
  - identification of barriers;
  - identification of career and employment goals;
  - understanding the local labor market related to employment goals; and
  - identification of training needed to achieve employment.

The RESEA program aligns UI and workforce service resources to best serve clients. Statewide delivery of intensive, personalized reemployment services results in reduced UI benefit durations.

Claimants may also receive comprehensive, specialized assessments and referral to Adult Education, JobCorps, registered apprenticeship programs or on-the-job training opportunities.

In addition to developing the individual employment plan, Job Service staff assist UI claimants with the Montana Career Information System (MCIS). MCIS provides many online assessments and resources for job seekers and allows job seekers to create an e-portfolio to store the results of all their assessments, create resumes, and explore occupations, education and training options. PEP Talk is a workbook used in conjunction with MCIS, that helps job seekers go through the career planning process to create an education and employment plan. Staff from Job Service, the Montana University System, and community-based organizations are trained to help clients navigate and interpret the results of their assessments.

DLI works continuously to improve workforce and UI program integration. In addition to those efforts reflected in the RESEA program, integration strategies include training for employment services staff on the UI claims intake and determination processes, additional training for all staff on identifying UI eligibility issues, and stronger

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coordination procedures for all staff, to ensure claimants who come into Job Service offices seeking assistance with their UI claims receive the best possible customer service.

- (d) Describe how the State will use WP funds to support UI claimants, and the communication between WP and UI, as appropriate including the following:**  
**(1) Coordination of and provision of labor exchange services for UI claimants as required by the WP Act;**

RESEA services, provided to UI claimants through initial appointments as well as continuing service provision, provide coordination and provision of labor exchange services through Job Service Montana offices. WP funds will be used to support UI claimants by providing job search and placement services, including counseling, testing, occupational and labor market information, assessment and referral to employers as well as by providing services for workers who have received notice of permanent layoff or impending layoff, or workers in occupations which are experiencing limited demand due to technological change, impact of imports, or plant closures. WP funds will be used to administer the work test for the State unemployment compensation system; and providing job finding and placement services for unemployment insurance claimants; and providing unemployment insurance claimants with referrals to, and application assistance for, training and education resources and programs.

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

Job Service staff work with all UI claimants, except for job or union-attached claimants. In order to receive UI benefits, claimants must register with Job Service online or in-person within 10 days of filing a claim. The process of filing a UI claim online requires the claimant to create a MontanaWorks.gov account. The account creation process gathers information which also meets the requirements for registration with Job Service.

- (3) Administration of the work test for the State unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants; and**

The state of Montana serves claimants in declining industries, ex-military claimants, and those at risk of becoming long-term unemployed through RESEA. The program includes:

- an orientation to services available at the office;
- a comprehensive assessment of the claimant's current situation and development of an individual employment plan, which includes:
  - identification of barriers;
  - identification of career and employment goals;
  - understanding the local labor market related to employment goals; and
  - identification of training needed to achieve employment.

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The RESEA program aligns UI and workforce service resources to best serve clients. Statewide delivery of intensive, personalized reemployment services results in reduced UI benefit durations.

Staff focus on providing career services that relate to the specific needs of each claimant. The assessment and referrals to reemployment services provided to UI claimants focus on identifying high-demand jobs and training opportunities available locally or regionally, that can lead to higher-paying, long-term jobs. Statewide delivery of intensive, personalized reemployment services results in reduced UI benefit durations. Staff in each Job Service office are trained and skilled in performing assessments, supporting claimants in local labor market information searches and can refer claimants to existing training opportunities in the area.

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

The state of Montana has an integrated work registration system that populates customer information across Employment Services and UI databases to eliminate data duplication for customers and staff.

In addition to system integration, Wagner-Peyser staff are cross-trained on all programs to ensure claimants receive the best possible services. All staff understand WIOA Title I, Title II and Title IV basic program eligibility criteria and how to make referrals to partner programs. Online tools available for use by staff during job seeker intakes and assist staff in identifying possible referral options including those to WIOA required partners.

#### **(e) AGRICULTURAL OUTREACH PLAN (AOP):** Each State agency must develop an AOP every four years as part of the Unified or Combined State Plan required under sections 102 or 103 of WIOA. The AOP must include:

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

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seasons 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 NFJP grantees, other MSFW organizations, and State and/or Federal agency data sources such as the U.S. Department of Agriculture (USDA) and the U.S. Department of Labor Employment and Training Administration.

### **BACKGROUND:**

The state of Montana's DLI serves and supports Migrant Seasonal Farm Workers (MSFW) the same way it serves and supports all clients using the public workforce system. Supporting the MSFW population in Montana is challenging because of the nature of the work and the difficulty accessing this population to holistically deliver services across agencies and partners.

Currently, the best estimate of migrant and seasonal farmworkers in Montana is based on the 2017 agriculture survey, estimating approximately 13,499 migrant and/or seasonal farmworkers in the state that worked for 7,322 farm or ranch employers. The estimate of agricultural workers shows little change between the peak season and low season, as the majority of agricultural workers for Montana are not a migrant community. The predominant demographic of a Montana agricultural worker is a Montana resident that does not travel significant distances for seasonal or temporary work, or is a year-round employee, and is English-speaking.

In order to best serve this population, the state of Montana coordinates outreach with the following partners:

- Rural Employment Opportunities (REO);
- Ag Worker Health & Services; and
- Montana Legal Services Association;

REO is Montana's National Farmworker Jobs Program (NFJP) grantee and there is a formal MOU between REO and the state of Montana defining roles and responsibilities and service coordination for the migrant and seasonal farmworkers. REO has staff located throughout the state who partner with the WIOA Title I providers to coordinate statewide services and outreach to migrant and seasonal farmworkers. REO staff conduct regular outreach activities resulting in individuals being referred to WIOA partners or other community-based organizations for services. In addition to serving individuals, REO also conducts employer outreach and engagement which has resulted in paid on-the-job training and work experience opportunities for qualifying MSFWs.

### **ASSESSMENT OF NEED:**

The majority of Montana farm workers earn low wages. The average annual income for the Montana National Farmworker Jobs Program (NFJP) participant is \$27,000 - \$31,000 annually. This figure is calculated on full-time work, and many are not employed full-time. A more accurate figure would be \$20,200 annually. Many basic family needs such as nutrition, housing, health care, childcare, and transportation are out of reach for farm worker families. As such, the state of Montana is committed to coordinating services for the MSFW population across partners to ensure this population receives the same services and supports that all clients using the public workforce system receive.



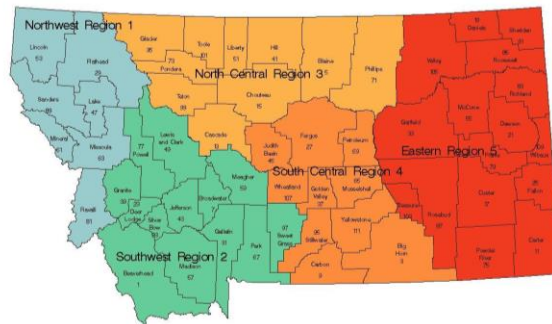
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As stated above, the predominant demographic of a Montana agricultural worker is a Montana resident that does not travel significant distances for seasonal or temporary work, or is a year-round employee, and is English-speaking.

### ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE:

Montana is a geographically large, diverse state with 17 Job Service offices serving migrant and seasonal farmworkers and conducting farmworker outreach. Montana's five economic regions have varied agriculture mix with different hiring and peak seasons based on the production within that region. Montana's five economic regions are:

- Northwest Region;
- Southwest Region;
- North Central Region;
- South Central Region; and
- Eastern Region.



#### Northwest Region:

In Montana's Northwest Region, the predominant crops are sweet cherries, alfalfa, and hay. The earliest activity involves planting alfalfa, and the hiring season for MSFWs typically lasts from June to September. Cherry harvest, which is particularly labor-intensive begins mid-July and ends in early August. Within the harvest months approximately 201 families are served which is approximately 862 individuals within those family units.

#### Southwest Region:

In Montana's Southwest Region, the predominant crops are alfalfa hay, barley, and potatoes. The earliest activity involves planting potatoes in early March and harvesting in September and October. In addition, the Southwest region of Montana has extensive cattle-calf operations with the hiring season for calving beginning in February and lasting through late spring.

#### North Central Region:

Montana's North Central Region is known as the Golden Triangle area which predominantly grows wheat, barley and pulse crops (dry peas, chickpeas, lentils). Typically, producers hire for these seasons from mid-July to mid-September. In addition to crops, this region is also known for its cattle production with hiring typically taking place in February through late spring for calving season.

#### South Central Region:

In Montana's South Central Region, the predominant crops are wheat and barley much like the North Central Region. However, cattle operations as well as sheep operations are also predominant. The typical hiring season for calving and lambing lasts from



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February to late spring. Throughout the year, approximately 33 families are served within the region; however, the migrant workers hired in this region have different characteristics than those traveling through Montana with the cherry harvest in the Northwest Region.

#### Eastern Region:

Eastern Montana also produces wheat and pulse crops like other regions in Montana with similar harvest seasons. In addition, this region is known for its sugar beet production. The harvest season for sugar beets typically lasts from September to November.

The employment rates in agriculture are difficult to predict due to consistent unknown factors inherent to crop production and, at times, livestock production, therefore all hiring and peak seasons are estimated based on typical production year. Montana-based seasonal farm workers are typically employed for up to nine months of the year and often work in more than one type of production (both livestock and crops). Crop production in Montana is affected by a short growing season and it's not uncommon for planting to occur later than desired and harvest to take place earlier than desired due to snow fall. Most crops must be planted at certain times of the year, weeded, fertilized, harvested as they mature or ripen. Montana growers have employed a number of seasonal farm workers who sometimes will move from farm to farm, but most often workers will stay on with one employer for the entire season.

The official estimates of agriculture employment are derived from surveys of agricultural establishments that participate in the unemployment insurance system, and from the previous year's state income tax reporting for agricultural establishments. As a result, they are more likely to count permanent agricultural workers than migrant and seasonal farm workers. Many Montana growers and producers express the lack of agriculture workers available in their area. This results in an increasing rate of using the foreign labor H-2A program.

- (4) Outreach Activities.** The Local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contract MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:
- (A)** Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.
  - (B)** Providing technical assistance to outreach workers.
  - (C)** Increasing outreach worker training and awareness across core programs including the UI program and the training on identification of UI eligibility issues.
  - (D)** Providing state merit staff outreach workers professional development activities to ensure they are able to provide high quality services to both jobseekers and employers.
  - (E)** Coordinating outreach efforts with the NFJP grantees as well as with the public and private community service agencies and MSFW groups.

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The state of Montana's DLI has designated staff conducting outreach across the state. MSFW outreach workers are trained in local office procedures, informal resolution of complaints and in the services, benefits, and protections afforded to MSFWs. Materials that are used in outreach activities include brochures for local health clinics, information on the complaint system, directions and brochures for local SNAP and TANF public assistance office, upcoming opportunities for occupational trainings, contact information for the local ag health and services offices, resources for child care, contacts for legal services, books for documenting their hours worked, information for contacting both state and federal Wage and Hour Division, and referrals for housing.

The American Job Centers throughout the state conduct a variety of MSFW outreach activities throughout the year. Outreach workers spend time in the service area contacting, explaining, and encouraging MSFWs to use the services and resources available in the area. The outreach workers find MSFWs throughout the state in areas where they live, work, and gather, such as markets, parks, and other locations. The responsibilities of the outreach workers include the following duties:

- Educating MSFWs on rights with respect to terms and condition of employment;
- Developing and maintaining links between MSFWs, American Job Centers, public and private community agencies, MSFW groups and employers;
- Coordinating outreach efforts with MSFW community service providers; assisting MSFWs with job search and placement, initiating job development contacts and referrals to supportive services;
- Assisting with the completion of the worker registration, resume, job applications, and other documents as needed;
- Providing assistance with obtaining unemployment insurance benefits, through the UI4U website, job search assistance, and referrals to specific employment opportunities if MSFWs are unemployed;
- Providing information about current and future employment opportunities which may be available, including posting job orders and informing MSFWs about available H-2A job orders;
- Informing MSFWs of the complaint system and providing assistance with filing and processing complaints;

MSFW Outreach workers receive training from the SMA as it becomes available and any collaborative training with other service providers for MSFWs including NFJP grantees. Staff members will be directed to complete online training modules on the GPS Workforce web site that are related to outreach and MSFWs. Additional training will be sent to all MSFW staff in the form of mini trainings covering the following subjects:

- Ag Worker Health & Services
- Montana Legal Services Association
- Defining MSFWs
- MSFW Outreach
- MSFW Outreach Log
- Rural Economic Opportunities services to MSFWs
- Human Trafficking

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- Sexual Harassment in the Workplace
- OSCC Complaint System
- Agricultural Employer Outreach

As a result of COVID-19, annual training in September of 2020 was provided virtually, and was well attended, and a successful conduit for ensuring staff have current information and receive regular training. Sessions included Labor Standards in Agriculture; Complaint Procedures; MSFW History Overview and MSFW Outreach; an H-2A Panel that included: an agent; an H-2A employer; an H-2A Housing inspector and the FLC Program Manager; a technical assistance session providing updates on the Foreign Labor Application Gateway (FLAG); H-2B changes; H-2A Housing inspection guidance and making referrals; This training also included presentations from Montana's MSFW partner agencies.

In October 2021, we were able to resume in person training for our Foreign Labor Certification team of H-2A housing inspectors, MSFW outreach workers, and their managers. Our regional Wage and Hour office provided training on Labor Standards which covered a broad spectrum of guidelines for housing, wage and hour guidelines, safety and the Migrant Seasonal Workers Protection Act. The new National Monitor Advocate joined our meeting virtually to provide guidance on MSFW outreach and an overview of the Monitor Advocate system. MSFW partner agencies were again invited to increase awareness and address opportunities for collaboration. A discussion of collaboration and leveraging resources through efforts to co-enroll participants in the WIOA adult and Rural Employment Opportunities (REO), a National Farmworker Jobs Program (NFJP) partner; United States Department of Agriculture (USDA) and MT Department of Agriculture were also invited guests to engage in conversations around opportunities to collaborate. H-2A housing inspection review, training and sharing of best practices were provided, especially in light of special procedures that were implemented as a result of COVID-19. This year's training concluded with a presentation about the investigation process, i.e., what happens to H-2A complaints and apparent violations.

This training also included presentations and networking with Montana's three primary MSFW partner agencies, Rural Employment Opportunities (REO), an NFJP grantee, Montana Legal Services Association and Ag Worker Health and Services.

The Montana Department of Labor & Industry has a working partnership and collaborates with the Montana Migrant Education and NFJP grantee, REO. REO has field staff located in offices throughout Montana, and serves individuals statewide. The agreements between the Montana Department of Labor & Industry and REO require coordinated services, including outreach activities. REO staff conduct regular outreach activities, according to their contract with the U.S. Department of Labor. The outreach conducted by REO staff results in individuals being referred to and co-enrolled in additional programs offered through Job Service offices or community-based organizations for further services. The REO staff also conduct outreach to employers on a regular basis, resulting in paid OJT and work experience opportunities for qualifying

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MSFWs. Outreach is approached from the standpoint of providing seasonal workers with the skills and education necessary to become employed full-time and to become economically self-sufficient. Through this partnership, Montana has been able to reach and serve members of the agricultural community who are otherwise not found or identified by workforce staff.

REO provides employment and training options and funding to MSFWs around the state and also to their qualifying dependents. The philosophy of serving entire families to create self-sufficiency is demonstrated by the Migrant Education Program, which is also administered through REO. That program provides education for children while parents and older family members work. In addition, the MEP program also provides language-specific services to schools across the state to help mitigate the impact on migrant children's education due to moving on a regular basis.

REO has partnerships with the Montana Food Bank and provides food and gas assistance to MSFWs traveling in both Eastern and Western migrant streams. In addition, REO has the ability to provide limited emergency housing and works with agencies to find housing for MSFWs. Many MSFWs have limited English proficiency and REO provides translation services to assist MSFWs navigate barriers to additional assistance and services.

REO has developed specific outreach plans for each of its targeted regions to find the individuals who not only travel as migrant workers but who subscribe to the lifestyle of resident seasonal workers.

- (5)** Services provided to farmworkers and agricultural employers through the one-stop delivery system. Describe the State agency's proposed strategies for:

  - (A)** Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system. This includes:
    - (i)** How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers;
    - (ii)** How the State serves agricultural employers and how it intends to improve such services.
  - (B)** Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups.
  - (C)** Marketing the ARS to agricultural employers and how it intends to improve such publicity.

#### **SERVICES PROVIDED TO MSFWs THROUGH THE ONE-STOP SYSTEM:**

Montana is required to make WIOA services available to all job seekers, including MSFWs, in an equitable manner. Each American Job Center must offer the full range of employment services, benefits and protections; this includes the full range of employment counseling, testing, job training, and referral services to MSFWs just as they are provided to non-MSFWs. Therefore, the services available through American

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Job Centers, including all other DOL-funded WIOA services, are available to MSFWs in a manner appropriate to their needs as job seekers.

The U.S. Department of Labor's Employment and Training Administration (ETA) requires that states ensure equity of services for MSFWs and non-MSFWs. Montana's Indicator of Compliance reports record all service outcomes tracked for regular job seekers, including MSFWs, such as receiving staff-assisted services, referrals to supportive services, referrals to jobs, career guidance, and job development contacts to ensure MSFWs continue to receive qualitatively equivalent and quantitatively proportionate services.

#### **SERVICES PROVIDED TO AGRICULTURAL EMPLOYERS THROUGH THE ONE-STOP SYSTEM:**

Montana's DLI recognizes the importance of the agricultural industry in Montana and has devoted resources to meet the labor needs of agricultural employers and MSFWs. Funding for agricultural services comes from Wagner-Peyser and Foreign Labor Certification funds granted to the state annually. Wagner-Peyser funds are given to Montana on a formula basis. The Foreign Labor Certification funds are provided by DOL/ETA to Montana to process foreign labor application requests, conduct housing inspections, conduct agricultural wage and prevailing practice surveys, and collect agricultural crop and labor information.

The American Job Centers provide customized services to employers on an individual and as needed basis. These services are in addition to the MWorks system, the online system available universally and at each Job Service office. MontanaWorks is used for registering job seekers for employment services, posting job openings online as well as in the offices, tracking services provided to job seekers and employers, and tracking referrals made to job openings. Outreach workers also provide the following service to agricultural employers:

- Perform recruitment activities to find and refer qualified MSFWs to fill the labor needs of agricultural employers;
- Encourage agricultural employers to publish their job openings using MontanaWorks to fill job openings;
- Provide labor market information with such data as supply and demand, salaries, training requirements, new and emerging occupations and industry growth; and
- Provide Rapid Response services due to planned closure or mass layoffs

Additionally, REO provides employers with reimbursement of up to 75% of a participant's wages during a contracted work experience or OJT.

#### **MARKETING:**

It is a policy of Montana Department of Labor & Industry to train local office staff on the procedures of the Employment Service Complaint System. All staff have been trained on how to accept a complaint from all citizens including farmworkers and to whom to send such complaints. Our partners have been informed and training has been shared on the ES Complaint process. This training will be shared on a yearly basis or as needed or requested.

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Agricultural employers are informed about Montana's Agricultural Recruitment System and what the process is for intrastate and interstate agricultural job orders.

**(6) Other Requirements:**

- (A) Collaboration.** Describe any collaborative agreements the 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 in establishing new partners over the next four years.
- (B) Review and Public Comment.** In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must:
  - 1) Consider any comments received in formulating its final proposed AOP;
  - 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and
  - 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.
    - (i) The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, and comments received, and responses to those comments.
- (C) Data Assessment.** Review the previous four years WP 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.
- (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.
- (E) State Monitor Advocate.** The plan must include a statement confirming the State Monitor advocate has reviewed and approved the AOP.

**COLLABORATION:**

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As mentioned above the state of Montana has a formal MOU in place with REO to coordinate and collaborate on services provided to MSFWs. Each of the partner agencies attend statewide training to discuss services and opportunities to collaborate on outreach efforts and share promising practices from throughout the state. Statewide trainings are designed for partner engagement in an effort to strengthen relationships and better serve this population of workers.

Training is developed collaboratively across partners and included presentations and networking opportunities with Montana's three primary MSFW partner agencies, REO, Montana Legal Services Association, and Ag Worker Health and Services.

#### **REVIEW AND COMMENT BY KEY STAKEHOLDERS:**

As outlined in federal regulations, the State Monitor Advocate is responsible to ensure that MSFWs receive equal employment services in both quality and quantity as compared to employment services provided to non-MSFWs. In the role as advocate, the Monitor Advocate promotes the needs and concerns of MSFWs to Workforce Services Division leadership. Additionally, the Monitor Advocate reviews and comments on directives and policy changes that affect the MSFWs. The Workforce Services Division has duly afforded the Monitor Advocate with the opportunity to comment on the Agricultural Outreach Plan as required by Title 20 CFR part 653.111(h). This Agricultural Outreach Plan has been shared with the NFJP grantee, Rural Employment Opportunities (REO) for which they have had the opportunity to comment. This plan has also been provided to the State Workforce Innovation Board for public comment. Following public comment, the AOP, comments received and responses to the comments will be provided to the Montana State Workforce Innovation Board for approval.

#### **DATA ASSESSMENT**

Montana continues to report through federal reporting on equity ratio indicators and the minimum service level indicators. We continue to look at means for continuous improvement in each of these areas. To ensure that all equity indicators will be met going forward, the Monitor Advocate will conduct annual programmatic reviews of Job Service offices. After reviewing program performance data, the Monitor Advocate will contact the office manager to discuss findings and offer initial recommendations and appropriate technical assistance to address any deficiencies.

#### **ASSESSMENT OF PROGRESS**

The State Monitor Advocate assesses its progress on a quarterly and annual basis. Outreach activities, agricultural job orders and other pertinent data is reviewed, and training and best practices are shared with local office staff.

#### **STATE MONITOR ADVOCATE STATEMENT**

Workload requirements are such that the State Monitor Advocate also serves as the State Workforce Advocate. This person oversees the agricultural operations of Job Service offices to ensure that MSFWs receive equal employment services in both quality and quantity as compared to employment services provided to non-MSFWs. Thus, the



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Monitor Advocate employee works as both a monitor and an advocate for the MSFWs. In the role as advocate, the Monitor Advocate promotes the needs and concerns of MSFWs to Workforce Services Division leadership. Additionally, the Monitor Advocate reviews and comments on directives and policy changes that affect the MSFWs. The Workforce Services Division has duly afforded the Monitor Advocate with the opportunity to comment on the Agricultural Outreach Plan as required by Title 20 CFR part 653.111(h).

### WAGNER-PEYSER ASSURANCES

#### THE STATE PLAN MUST INCLUDE ASSURANCES THAT:

- (1) The WP 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. (sec121(e)(3));
- (2) The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers;
- (3) If a State WDB, department, or agency administers State laws for VR of persons with disabilities, the board, department, or agency cooperates with the agency that administers WP services, Adult and DW programs and the Youth Programs under Title I; and
- (4) State agency merit-based public employees provide WP Act-funded labor exchange activities in accordance with DOL regulations.

### ADULT EDUCATION AND LITERACY PROGRAMS

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

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

The Montana Board of Public Education, upon recommendation from the Superintendent of Public Instruction, adopted the Montana Content Standards for English Language Arts/Literacy and Mathematics, on November 4, 2011. These standards, along with science standards adopted in 2016, ensure that when secondary students have the knowledge and skills they need to succeed in the 21st century economy. Skills include problem-solving, critical thinking, communication, teamwork, research, and the use of technology.



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In February 2015, the Adult Education (AE) Unit at the Office of Public Instruction (OPI) adopted the College and Career Readiness (CCR) Standards for Adult Education. These standards identify the essential CCR components required to be incorporated into the adult education classroom. By adopting these standards, Montana's AE programs will have student expectations that are consistent with K-12 students. Additionally, AE programs will have access to K-12 tools and materials that support student learning.

The adoption of the CCR Standards will drive adult education professional development, acquisition of textbook and technology-based resources, and selection of formative and summative assessments. Aligning adult education standards with the Montana Content Standards provides all adult students with the same academic opportunity to be prepared for employment or postsecondary training without remediation. Eligible providers will work with the state to identify curricular framework for the standards that take into account academic requirements for non-credit bearing courses in postsecondary and occupational standards. The eligible provider will ensure that all teachers have implemented, or will implement standards-based education, and agree to participate in ongoing professional development that supports standards-based education.

**(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 adult education and literacy activities, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of local activities.

#### **ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)**

Adult Education;

Literacy;

Workplace adult education and literacy activities;

Family literacy 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 in such programs, services, or activities are related to family literacy activities. In providing

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family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

The state of Montana requires eligible providers to operate a program that includes:

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Work force preparation activities; or
- Integrated education and training.

In 2015, all adult education providers successfully completed a Local System Logic Model that demonstrates how they can integrate all the adult education and literacy activities listed above to effectively provide comprehensive adult education services required for transitioning adults to postsecondary education, occupational training or employment. This model continues to evolve and is the driving force for adult education services. This confirms that programs can deliver a variety of services to meet individual student needs. The foundation of every provider's Local System Model is the identification of partners they need to collaborate with to provide the variety of adult education and literacy activities.

All eligible adult education and literacy providers assess the need to provide an English Language Acquisition and Civics Education Program in their area and provide services when there is a demonstrated need. The state will not fund family literacy activities, as limited resources have inhibited the state's ability to provide those activities in Montana.

The Montana AE uses the 13 considerations listed under "Required Local Activities" to fund each eligible provider establishing and operating programs that provide AE and literacy activities. The Request for Proposals (RFP) RFP will include the considerations and ask for applicants to summarize how they meet the described elements. Reviewers will be given a rubric and scoring guide that includes these considerations. Funding is determined using a state-imposed performance-based formula.

The state funds local providers that serve adults 16 years and older, not enrolled in secondary school. Services include:

- Adult Education and Literacy Services;
- Workplace Preparation tied to Career Pathways;
- English Language Acquisition;
- Integrated Education and Training.

Local providers are selected using the following criteria:

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1. Scope: Programs must be able to provide data demonstrating they have met previously proposed state targets for the required percent of students making a measurable skill gain. For programs not previously funded, data demonstrating student learning gain, especially for individuals with low levels of literacy, will need to be provided. Programs will also need to make available data that demonstrate they have provided students the knowledge and skills needed for successful transition to postsecondary education or employment. Both measurable skill gain data and transition data must be disaggregated to demonstrate a history of success with students who have low levels of literacy, disabilities (including learning disabilities), or are English language learners.

Eligible providers will need to articulate how their instructional delivery model aligns to the needs of one-stop, postsecondary, and employer partners. This alignment at a minimum must include the ability to offer flexible scheduling so that adult education services coordinate with the students' wrap-around support services and logistic needs. The delivery model must be of sufficient intensity and duration so that the students' will exit with the necessary skills to attain their career goal. Existing providers will base intensity and duration of service on demonstrated past effectiveness (student skill gain and transition outcomes) and the latest research on the effectiveness of time and intensity.

It will be critical for each program to validate their commitment to an instructional delivery model that can support high school equivalency attainment, as well as preparation for entrance into postsecondary, a training program, or employment for adults with, or without, a high school diploma. This support must lead to preparation for a career pathway for all students, including the low-skilled and under employed, in need of increasing their knowledge and skills for the next career step. All eligible providers will assess the need for providing an English Language Acquisition and Civics Education Program in their area and provide services when there is a demonstrated need.

2. Content: Eligible providers will verify that adult education activities are conducted by licensed teachers, counselors, administrators, or individuals with relevant adult education experience and confirm that all staff will participate in high quality professional development offered by the state AE unit. Professional development activities will include face-to-face and virtual opportunities, so all staff will be able to participate in a variety of delivery modalities.

Providers will ensure that curriculum supports high school equivalency attainment, measurable skill gains, and career pathways. Instruction in all content areas, including reading, writing, speaking, mathematics, and English Language Acquisition are delivered by staff who are knowledgeable of the essential components of reading instruction. Providers must use scientific, research-based instructional delivery models for students in all content areas. Providers will articulate how distance learning, and other modes of technology, is integrated into

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instruction to support digital literacy attainment and meet students' specific learning needs.

The goal of instruction for all students will be a successful transition to employment, postsecondary, or training according to their chosen career pathway. This will require contextualized instruction, and student pathways guided by labor market needs and data from collaborative partnerships including:

- Education Partners;
- One-Stop Partners;
- Community-Based Organizations;
- Employers.

The array of program activities that support individual student career pathways must be based on each student's career portfolio. Eligible providers will describe how they will assist all students in setting up their career pathway portfolio through a series of lessons in the Montana Career Information System (MCIS). Providers will detail how teachers will assist students in aligning their skills and interests with a career choice and help them create long and short-term goals to enter their career pathway. Each program will share their protocol for linking student career pathways to academic lessons that are relevant and supportive of the student's career goal. Providers will confirm that they are developing curriculum and providing contextual learning activities, so students acquire the 21st century knowledge and skills needed for transition to their individual career pathway. Providers will apprise the state of key partners involved in the development of the contextualized curriculum. Eligible providers will also articulate how they will share student career portfolios with other agencies and support services.

Providers will ensure that the teaching staff offer a variety of instructional strategies that engage students and promote student persistence and retention; this should include whole group instruction, peer tutoring, individualized instruction, distance learning, hybrid models, and co-teaching formats. The variety of instructional strategies will integrate academics, career counseling, and soft skills to bolster the students' ability to gain employment, transition to college, or enter a training program that could include an apprenticeship.

3. Organization: Providers must document evidence that they have the capacity to support the high-quality data information system necessary to report participant outcomes and monitor program performance. The system will collect all data elements required for the WIOA Annual Statewide Performance Report. Primary indicators of performance that will be reported include:
  - Participants in unsubsidized employment during the second quarter after exit;
  - Participants in unsubsidized employment during the fourth quarter after exit;
  - Median earnings from unsubsidized employment the second quarter after exit;

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- Percentage of students who obtain a postsecondary credential or a high school equivalency diploma;
- Percentage of students who participate in an education or training program; and
- Percent achieving a measurable skill gain.

Providers must provide evidence of activities with other education institutions, local workforce partners, and agencies that support student career pathways. MCIS is the common career planner used in the AE program. The common career planning tool will be a resource in every AE program.

Beyond student attainment of a measurable skill gain, achieving a high school equivalency or postsecondary credential, or entering a career pathway, eligible providers must demonstrate that they have established cross-agency partnerships to help students navigate system challenges that can be barriers to success, like completing applications, writing resumes, scheduling campus visits, etc. Providers must be willing to cooperate with agency partners to provide wrap-around services common clients need.

Through ongoing labor market analysis all providers will have an awareness of regional labor market needs to provide teachers with a working knowledge of regional career opportunities. Using current information provided by Montana Department of Labor at [lmi.mt.gov](http://lmi.mt.gov), providers will ensure relevancy in transfer of learning toward student career pathway goals. Providers must be able to disclose their methodology for ensuring that employer and labor market needs are helping drive their instructional practice. Allocations for providers are awarded by a funding formula that recognizes the components of an effective AE program based on the WIOA Statewide Performance Report. Effective programs will be those that deliver instructional activities that support student transition to specific occupations or career clusters. Grant award preference is given to providers that demonstrate that instructional services are delivered cost effectively to a reasonable number of students, and that they can make themselves readily available to core partners for wrap around services. Consortium applications are encouraged to assist providers in meeting the cost benefit expectations and core partner collaboration.

### **(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 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

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### 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 individuals who are likely to leave the correctional institution within five years of participation in the program.

Montana's Office of Public Instruction will use no more than 20% of funds awarded to eligible providers to support programs under section 225 for incarcerated and institutionalized individuals. Corrections 225 funds are targeted for adult education and literacy activities and career pathways. Grant funds are awarded to any eligible provider that offers services to incarcerated or institutionalized individuals. Funds are awarded using the same competitive application process outlined in the Common Elements-Multi-Year Grants or Contracts section; after which providers may request funds on an annual basis through an extension process.

The state will award allocations to correctional institutions including:

- Prisons;
- Jails;
- Reformatories;
- Work farms;
- Detention centers;
- Halfway houses;
- Community-based rehabilitation centers; or
- Any other similar institution designed for the confinement or rehabilitation of criminal offenders.

Providers will demonstrate their ability to provide adult education that includes career pathway curriculum, integrated education and training (if available), peer tutoring, and transition initiatives that may lead to reduced recidivism. Providers will confirm their ability to support individual participant's career plans through curriculum and activities that assist in not only achieving an academic measurable gain, but transition to employment or postsecondary or training after exit.

Eligible providers must provide documentation on their capacity to support high school equivalency attainment and career pathways. Eligible providers will report on the WIOA primary performance indicators the same as all other AE providers. Additionally, providers must report their progress in carrying out their identified program activities to support career pathways, as well as provide data on the rate of recidivism for offenders served.

### (d) INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM (IELCEP):

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

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The state's application for 243 funds requires applicants to describe how they will provide English language acquisition and civics education in combination with integrated education and training activities. Eligible providers funded with 243 funds must design programs to prepare English language learners for placement in unsubsidized employment leading to economic self-sufficiency and integrate with local workforce development to carry out the activities of the program.

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.

Montana's AE program provides Integrated English Literacy and Civics Education (IELCE) activities through ongoing collaboration and conversation at state, regional, and national conferences. Through combined projects and various learning platforms, a website specifically for Montana ELA professionals as well as students was developed. This website is updated on a continuous basis and is available as a reference for both instructors and students. Teachers continually share best practice and cutting-edge material. These platforms provide the professional networking needed to meet the requirements under WIOA and deliver the services students need. These services focus on providing English language adult learners, including professionals with degrees and credentials in their native country, to achieve competency in the English language and acquire the skills needed to function as citizens in the United States. Such services include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation and may include workforce training.

The IELCE funds for sections 231 and/or 243 are awarded to eligible providers through a competitive application process outlined the Common Elements-Multi-Year Grants or Contracts; after which providers may request funds on an annual basis through an extension process.

**(e) STATE LEADERSHIP:** Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA.

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

State leadership funds support the alignment of AE activities with those of other core partners to promote career pathways that provide students access to employment and training services. The state will ensure eligible providers' integration of pathway instruction through a variety of funded activities.

First, the state will collaborate with core partners to provide regional and statewide conferences and trainings. The State AE Unit has already supported statewide workshops that have brought hundreds of staff members from all the core partner agencies together to foster discussion on how to best coordinate services to support a client's development of a career pathway and expedite his/her transition to employment or training services. AE representatives continue to be involved in WIOA planning on both state and local levels. Braiding funds with other core partners for conferences and trainings focused on supporting career pathways is how leadership funds are used to

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align with the work of core partners. Collaboration across core partner agencies will evolve to meet the needs of WIOA implementation and sustainability.

Braiding funds with other core partners for conferences and trainings focused on supporting career pathways is how leadership funds are used to align with the work of core partners. Collaboration across core partner agencies will evolve to meet the needs of WIOA implementation and sustainability. Second, the state will support eligible providers' ability to integrate and sustain career pathways in their instructional practice. Funds will be available to support regional meetings with workforce and one-stop partners to help AE programs identify the components of job-driven training that need to be incorporated into their curriculum. Regional professional development will make use of leadership dollars to assist programs in learning how to become responsive to local labor market demands. Third, the state will use funds to develop templates and identify resources that support a systemic approach to career pathways; technical assistance will be made available for providers on the use of state developed resources that will inform their pathway implementation.

State leadership funds will establish high quality professional development to improve instruction in the essential components of reading instruction and research-based approaches related to the specific needs of adult learners. Leadership activities with essential components of reading focus will be used to create the foundation for adults to develop the skills needed to obtain high school equivalency, transition to postsecondary education, or enter the workforce. The state will contract with field and subject experts as needed. Teachers are required to participate in a variety of professional development that blends face-to-face and virtual delivery.

The state will also contract for services such as a robust, vendor-supplied data management system to accurately capture WIOA Title II participant and performance data as well as with individuals to bring research-based activities that support adult learners in other content areas and workforce learning activities. Program data will inform the state on promising instructional practices and effective instructional strategies. The state will use this information to disseminate information about models and promising practices related to the needs of adult learners. In programs where students readily make gains in reading, the state will support staff in the development of teacher lessons, resource links, and fund preparation for trainings to assist colleagues in successful reading instruction. The state will carefully monitor student data to see patterns on student transition to postsecondary, employment, and credential attainment. Programs that have data reflecting successful student exit trends are provided funds to prepare workshops and regional trainings to share instructional strategies and activities that positively impact student outcomes.

The state recognizes the importance of students' acquiring 21st century work-place skills, so the state will provide technical assistance to eligible providers on an as needed basis. Technical assistance is available for instructional improvement in reading, writing, mathematics, English language acquisition, speaking, as well as distance learning. Technical assistance is offered in two ways: training with staff from other



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eligible providers who have demonstrated effectiveness or independent contractors. In either case, the individual contractor is selected based on their ability to provide rigorous, research-based content that will promote program improvement. Working with one-stop partners to provide student access to education and training services is a priority. Technical assistance is available for programs in the use of technology, including digital technology and technology for system efficiencies.

The state requires each program to conduct monthly audits to evaluate students' pre-test gains, retention, pathway activities, and student exit outcomes. The state will use the monthly audits to evaluate program effectiveness. As documented evidence indicates a programs' ability to meet the learner needs, the state will conduct further investigation to determine what unique factors are contributing to the programs' continued success. If there emerges a model that can be replicated by other programs the state will use leadership funds to disseminate information about the specific model that appears to be a promising practice.

The state will also conduct periodically scheduled onsite monitoring to gather additional information about the eligible providers' successes in equipping students with skills needed for seamlessly transitioning from AE to employment, postsecondary, or training. A monitoring evaluation tool will be used to guide the onsite monitoring; an onsite monitor will review student files, data entry protocol, and overall adherence to WIOA requirements. The onsite monitor will also conduct student and staff interviews using a template designed to capture the providers' alignment with core partners and implementation of career pathways. The desk audit coupled with results from the onsite monitoring will be used to evaluate the quality and improvement of adult education and literacy activities across the programs. They will also be a source for the state to glean and disseminate information about models and promising practices. The state will use leadership funds to disseminate information about programs who are implementing innovative practices that were not readily captured in the monthly desk audit.

Desk audits and onsite monitoring results will also be used to identify priorities for funding permissible activities. Combined these two activities will provide the state information on the eligible provider's implementation of the state-adopted content standards, teacher quality, and the systemic approach to student transition. These will be the high priorities for permissible funds if program analysis indicates providers are facing challenges.

In summary, the desk audits and onsite visits described above will be the primary methods to monitor and evaluate the quality of adult education and literacy activities. Additionally, the state has always engaged in ongoing data monitoring which provides the opportunity for immediate technical assistance to promote local program success. In the event that the desk audit, on site evaluation, or ongoing data conversations are not sufficient support for program success, the state will require a low-performing provider to complete a corrective action plan. The plan will include a description of required activities to improve performance, strategies to meet each activity, evidence of completion, projected date for completion, and assigned staff for each activity. The state

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will schedule regular conference calls and site visits to assist in local provider in their program improvement plan. All AE staff will be required to participate in a minimum number of hours of professional development annually that is provided by the AE Unit at the Montana Office of Public Instruction. The state will provide continuing education units for teachers that will be tracked in the state student information system.

**(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.

The state assesses the quality of providers through data analysis. The state reviews data to track providers' success in meeting state targets in the following areas:

- Academic learning gains;
- Entry into employment in required quarters;
- Obtaining a secondary credential; and
- Enrollment into postsecondary or training.

Monthly desk audits provide the state with information on which providers are not meeting targets and need of technical assistance beyond the state leadership activities that are provided. Technical assistance is targeted to the area of need and is individualized and focused.

At the end of a program year, providers not meeting targets are required to participate in state-determined technical assistance or a program improvement plan. If a program does not adhere to technical assistance or improvement plan components, they may be in jeopardy of not receiving AEFLA funds. When funds are not awarded to an existing provider, the state will run an RFP for a new eligible provider in the area, if there is no other AE provider in the region.

Programs increasing student academic gains and outcomes cannot decrease in subsequent program years. Targets must be met or exceeded each year.

Allocations to eligible providers are awarded according to the state performance-based funding formula. Points are awarded for performance outcomes; programs not meeting outcomes will receive reductions in their allocation.

The quality of professional development is assessed with scrutiny similar to assessing the quality of local providers. The state uses a combination of program data and a statewide survey to determine professional development needs. Professional development providers and activities are selected to meet the identified state needs, and they are selected according to their past effectiveness. Special attention is given when determining who and how we will select a professional development strategy based on research-based methods. This is a priority for the state. At the conclusion of each professional development activity, all participants complete an evaluation, which is aggregated at the state level to assess the impact of the activity and what follow-up activities are needed to support program improvement. Additionally, participants are

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required to analyze student performance data prior to professional development, at the conclusion of the activity, and continue to evaluate the data overtime, until it is determined the professional development has become job-embedded and is making the anticipated positive impact on student outcomes. The programs self-analysis and student data will also be a source for the state to glean and disseminate information about models and promising practices. The state will use leadership funds to disseminate information about programs who have effectively implemented innovative practices based on professional development activities.

### ADULT BASIC EDUCATION AND LITERACY PROGRAMS CERTIFICATIONS AND ASSURANCES

**STATES MUST PROVIDE WRITTEN AND SIGNED CERTIFICATIONS THAT:**

- (1) The plan is submitted by the State agency that is eligible to submit the plan;
- (2) The State agency has authority under State law to perform the functions of the State under the program;
- (3) The State legally may carry out each provision of the plan;
- (4) All provisions of the plan re consistent with State law;
- (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;
- (6) The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;
- (7) The agency that is submitting the plan has adopted or otherwise formally approved the plan; and
- (8) The plan is the basis for State operation and administration of the program;

**THE STATE PLAN MUST INCLUDE ASSURANCES THAT:**

- (1) The eligible agency will expend funds appropriated to carry out Title II of the WIOA only in a manner consistent with fiscal requirements under Section 241(a) of WIOA (regarding supplement and not supplant provisions);
- (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;
- (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;
- (4) The integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities;
- (5) The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to (1) prepare adults who are ELLs for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and (2) integrate with the local workforce development system and its functions to carry out the activities of the program; and

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- (6) Using funds made available under Title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.

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

### PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION

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

#### (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;

1. **Access and Quality.** Montanans with disabilities can access high-quality competitive, integrated employment.
  - Increase the number of clients served by VRBS and the percentage of VRBS clients employed, retained, and promoted in competitive, integrated jobs.
  - Improve the quality of VRBS services.
  - Increase the percentage of clients meeting and exceeding WIOA performance indicators.
2. **Youth Engagement.** Montana youth with disabilities are effectively engaged in vocational exploration and work readiness training.
  - Increase participation of students (14-21) with disabilities engaged in high quality Pre-ETS.
3. **Equity.** All people with disabilities are engaged and valued for their abilities and contributions to our workforce, with extra emphasis on reaching underserved and unserved populations.
  - Increase resources for people who are Deaf or hearing impaired.
  - Increase blind and low vision supports.

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- Increase resources and access to rural and migrant communities as well as language minorities.
  - Increase collaboration with 121 American Indian Vocational Rehabilitation Programs and resources to American Indians on reservations and in urban settings.
  - Increase support for people with disabilities in institutional settings.
  - Increase support for youth in foster placements.
4. **Coordination.** Montana's Workforce system is coordinated to effectively support people with disabilities and their employers.
- Increase coordination with partner organizations.
  - Enhance coordination with businesses/employers.
  - Enhance eligibility and navigation processes for clients.
5. **Organizational Sustainability.** VRBS is a stable, sustainable organization.
- Increase fiscal stability, staff professional development, staff engagement and satisfaction.

(2) the Designated State unit's response to the Council's input and recommendations; and –
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**SRC Recommendation:** Increase the number of clients served by VRBS and the percentage of VRBS clients employed, retained, and promoted in competitive, integrated jobs.

- **VRBS Response:** VRBS continues to be on Order of Selection due to staffing levels. VRBS opened Category 1 in June 2021 and continues to invite people in for IPE development from Category 2. VRBS anticipates more participants over the next biennium than in the previous.

**SRC Recommendation:** Improve the quality of VRBS services.

- **VRBS Response:** VRBS continues to be committed to providing high quality services and is in a continuous improvement cycle, analyzing data and performance to identify training needs of staff. For example, it was identified that better access to benefits counseling for our clients receiving SSI and SSDI was needed. As such, VRBS trained and certified four vocational rehabilitation counselors to become Community Partner Work Incentives Counselors (CPWICs). In early January 2022, an in-house referral procedure was developed and published. The first referrals for benefits counseling have been received and our in-house CPWICs having begun providing individualized, work incentive counseling services these VRBS participants.

**SRC Recommendation:** Increase the percentage of clients meeting and exceeding WIOA performance indicators.

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- **VRBS Response:** Again, VRBS is in a continuous improvement cycle analyzing data and performance to identify training needs. Specifically, VRBS leadership are in the process of developing a “report card” system to bring awareness to individual rehabilitation counselors regarding their own level of achievement with the WIOA performance measures and will be setting individual goals for each rehabilitation counselor based on their existing data.

**SRC Recommendation:** Increase participation of students (14-21) with disabilities engaged in high quality Pre-ETS.

- **VRBS Response:** The Agency continues to be committed to providing high-quality Pre-ETS to Montana’s youth. The Pre-ETS Bureau is fully staffed and able to serve all Montana counties after filling the long-vacant Havre Pre-ETS position in October 2021. Additionally, VRBS leadership are exploring options to expand the Pre-ETS bureau in Montana’s fastest growing community by designating a Pre-ETS Specialist to Bozeman.

**SRC Recommendation:** Increase resources for people who are Deaf or hearing impaired.

- **VRBS Response:** VRBS remains committed to delivering excellent services to individuals who are Deaf and/or hearing impaired in Montana. VRBS has a designated Program Manager for Deaf Services whose primary role is to train and provide support and consultation services to VR staff with Deaf and/or hearing-impaired clients. Of particular note, outreach efforts are underway with Montana’s university system to begin discussions about starting a sign language interpreter training program in the state.

**SRC Recommendation:** Increase blind and low vision supports.

- **VRBS Response:** The Agency continues to be committed to providing comprehensive and quality services to individuals with visual impairments in Montana. VRBS established the Blind and Low Vision (BLV) Bureau in February 2021 in an effort to provide organizational structure and specialized leadership to emphasize, expand, and improve the unique, specialized services provided by the Blind and Low Vision staff. Since its establishment, the BLV has established relationships with the National Federation of the Blind in Montana (NFB) as well as the Montana Association of the Blind (MAB) to synthesize resources to better assist Montana’s older blind population. As well, plans to expand the Business Enterprise Program (BEP), improve coordination with Tribal visual clinics, and collaborate with the Diabetic Retinopathy Project.

**SRC Recommendation:** Increase resources and access to rural and migrant communities as well as language minorities.

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- **VRBS Response:** Montana VRBS continues to be committed to providing high quality services to our rural and migrant communities as well as language minorities. Efforts are underway to increase outreach to rural areas, especially reservations and other tribal communities through formal connections with Indian Health Services, Tribal colleges, and other Tribal programs on each of the reservations. The BLV will be connecting visual specialists to inform and increase referrals for Older Blind Program services. Plans to expand the existing relationship with Rural Employment Opportunities (REO) and recently renewed partnership the National AgrAbility Project are in motion. Additionally, VRBS is working on collaborating with Cutting Fences, a podcast featuring stories of Montana farmers and ranchers with disabilities, to share VRBS success stories and market the transformative rehabilitative services available through VRBS.

The Havre VRBS office covers one of the most expansive rural areas in Montana, the Hi Line. Havre recently hired an additional counselor to provide general VR services in this area and as mentioned, a Pre-ETS Specialist was hired in October 2021 to facilitate and expand Pre-ETS services along the Hi-Line.

The Missoula VRBS office also works closely with Soft Landings, an organization that welcomes, supports, and assists refugees and immigrants to integrate and thrive in Montana.

**SRC Recommendation:** Increase collaboration with 121 American Indian Vocational Rehabilitation Programs and resources to American Indians on reservations and in urban settings.

- **VRBS Response:** Montana VRBS values the five 121 programs in Montana and is committed to continually improving collaboration. Recent efforts to improve collaboration with American Indian Vocational Rehabilitation Programs include:
  - Updating cooperative agreements with all five 121 programs in Montana including, Assiniboine Sioux, Chippewa Cree Rocky Boy, Confederated Salish Kootenai, Fort Belknap, and Blackfeet Tribes
  - Relationship building and technical assistance on eligibility and other VR basics with new leadership of Confederated Salish and Kootenai Tribes (CSKT) 121 program;
  - Extending invitation to CSKT VR staff to attending Foundations training facilitated by the VRBS Quality Assurance Officer;
  - VRBS leadership providing technical assistance and support to Fort Belknap 121 Program on implementing Order of Selection (OOS) and continuing to engage in regular communications with their 121 Program leadership to ensure high-quality services to dually enrolled clients;
  - Providing outreach to recently recognized Little Shell Tribe;
  - Re-building a caseload of dually enrolled clients in Browning on the Blackfeet Reservation; and



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- Participating in Tribal events with 121 programs to provide information on vocational rehabilitation services.

**SRC Recommendation:** Increase support for people with disabilities in institutional settings.

- **VRBS Response:** VRBS remains committed to improving outreach and invitations to apply for services to individuals with disabilities in institutional settings. Pre-ETS Specialists regularly reach out to students in institutional settings including Pine Hills Youth Correctional Facility, Shodair Children's Hospital, Yellowstone Boys and Girls Ranch (YBGR), Montana School for the Deaf and Blind (MSDB), for Pre-ETS and VR referrals. As well, YBGR's Yellowstone Academy and MSDB provide contracted Pre-ETS services to youth in their programs. VRBS leadership is working to establish liaisons for and relationships with other institutions in Montana including Montana State Hospital, Montana Chemical Dependency Center, MT Mental Health Nursing Care Center, Intensive Behavioral Center, and Montana's Veterans' Homes.

**SRC Recommendation:** Increase support for youth in foster placements.

- **VRBS Response:** VRBS continues to be committed to improving outreach to youth with disabilities in foster care placements. VRBS leadership recently met with Child and Family Services leadership to begin discussions on expanding access to VRBS for youth in foster care. Initial steps to better partner and collaborate include ongoing discussions among leadership from both programs and scheduling cross training in-service sessions with staff from both programs.

**SRC Recommendation:** Increase coordination with partner organizations.

- **VRBS Response:** VRBS leadership has tasked all nine VRBS field offices with meeting their local foster care and veterans' programs and providing training to their staff on VRBS during the 2022 calendar year as well as at least three other programs of their choosing located in their local service area. The Bozeman field office staff are developing and expanding partnerships with programs serving the corrections population, the Kalispell field office staff are regularly taking applications for VRBS services at the homeless shelters in the area, and the Missoula field office staff have partnered with a local agency to take applications on and provide services to teen fathers with disabilities. As well, supervisors of all nine field offices are required to attend Community Management Team meetings in their local communities.

VRBS recently hired a new Business Services Specialist who has been tasked with continuing to grow partnerships with local Society for Human Resource Management (SHRM), Chambers of Commerce, Job Service Employer Committee (JSEC), Montana State Employers Council (MSEC) of the nine field offices to increase outreach to businesses.



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Additionally, VRBS has begun to explore coordination with our faith-based community leaders. Of note, the Missoula VRBS office recently met with the Missoula Interfaith Collaborative and is coordinating with them to becoming a contracted Community Rehabilitation Provider.

**SRC Recommendation:** Enhance coordination with businesses/employers.

- **VRBS Response:** VRBS continues to be committed to enhancing coordination with businesses through several avenues, including participation in Society for Human Resource Management (SHRM), Chambers of Commerce, Job Service Employer Committee (JSEC), and Montana State Employers Council (MSEC) as available across the state.

The Business Services Specialist has developed a team of Vocational Rehabilitation Counselors (VRCs) across the state that are tasked with providing Windmills to businesses in their area on a quarterly basis. This training is used as an employer-employee awareness program specifically addressing attitudinal barriers. In the coming months, Windmills trainings are scheduled with the Bozeman, MT Chamber of Commerce and with the Missoula, MT SHRM. Additionally, the Business Services Specialist has initiated a long-term project to provide Windmills to all programs within the State of Montana Department of Public Health and Human Services (DPHHS) beginning with the Office of Human Resources (HR).

In October 2021, VRBS celebrated National Disability Employment Awareness Month by hosting a viewing of the Hearts of Glass documentary film followed by a panel discussion on the film and disability employment. Businesses across the state were invited to participate in this event and Town Pump, a leading VRBS business partner, and a few employees were panel members for the discussion.

Lastly, the Business Services Specialist and a few team members will be attending the Montana SHRM conference in May 2022.

**SRC Recommendation:** Enhance eligibility and navigation processes for clients.

- **VRBS Response:** VRBS remains devoted to enhancing the eligibility and navigation processes for clients. VRBS leadership and the Quality Management Technical Assistance Center facilitated a training for all VR staff on making eligibility determinations and the importance of rapid engagement. Following that trainings, VRBS leadership has been encouraging rapid engagement of clients from the first contact with VR as well as analyzing eligibility timeliness data and performance to identify training needs of staff.

VRBS leadership is also making large print and other accessible versions of the VR application available to clients upon request. Additionally, a team has been assembled to update a “roadmap of services” form that provides visual and written information regarding navigating the steps of VRBS.

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Also, the Pre-ETS Bureau has streamlined the process for students with disabilities to enter into services including implementing shorter forms and an electronic signature process.

**SRC Recommendation:** Increase fiscal stability, staff professional development, staff engagement and satisfaction.

- **VRBS Response:** Regarding fiscal stability, VRBS entered into its final penalty year (Federal Fiscal Year 2022) for Maintenance of Effort. Leadership has been anticipating and planning for this penalty and is well prepared to continue serving existing participants as well as invite more individuals from the Category 2 waitlist for services. Internal controls and fiscal procedures have been written and implemented to ensure long-term fiscal stability of VRBS including monthly budget meetings for all administrative program staff and trainings from Quality Management Technical Assistance Center for all VRBS leadership on fiscal management, internal controls, and WIOA data requirements.

Regarding staff professional development, VRBS was offered participation in VR 101 and associated free staff training from the Interwork Institute at San Diego State University (SDSU). All VR staff completed VR 1010 training and the VRBS Quality Assurance Officer is working with staff at SDSU to develop and implement ongoing, individualized training for Montana's VRBS staff.

Regarding staff engagement, VRBS leadership will be sending out an engagement survey during Spring 2022 to collect and analyze engagement data to identify ways to improve staff engagement statewide. Additionally, VRBS leadership will continue to offer free trainings to staff for CRC credit as well as share information on other applicable local and national trainings for individual participation as available.

(3) the designated State unit's explanations for rejecting any of the Council's input or recommendations.
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Each explanation was included immediately following the SRC comment. See previous section.

<b>(B) Request for Waiver of Statewideness</b>
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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:
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(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;
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| (2) The designated State unit will approve each proposed service before it is put into effect; and<br>(3) All State plan requirements will apply |
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Requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

No waiver requested

<b>(C) Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System.</b>
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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:
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- |   |
|---|
| 1. Federal, State, and local agencies and programs;<br>Section 121 Vocational Rehabilitation Projects |
|---|

VRBS presently has cooperative agreements with all of the five Section 121 projects (Flathead Reservation, Fort Belknap Reservation, Fort Peck Reservation, Rocky Boy's Reservation, and the Blackfeet Reservation) located in Montana. The purpose of these agreements is to establish procedures to assure continued coordination between the 121 projects and VRBS. These agreements are implemented for the sole purpose of enhancing, to the greatest extent possible, the delivery of rehabilitation services to persons with disabilities living in the state of Montana and residing on or near the five reservations that currently have a tribal vocational rehabilitation project.

As a result of COVID-19, most reservations were on lockdown for an extended period of time restricting access by outsiders due to safety concerns. VRBS leadership did not complete formal annual visits with any of the 121 programs during 2020 or 2021, but intention to resume regular touch base sessions with the tribes is anticipated to resume in 2022 and may be facilitated virtually.

In late 2021, the Flathead Reservation VR Project contacted VRBS leadership to request guidance and technical assistance related to hiring VR staff under training assignments and to accurately completing eligibility determinations for applicants to their program. VRBS provided assistance with developing updated job advertisements and job descriptions for the Flathead Reservation VR Project as well as began working closely with the program on best practices related to making eligibility determinations. The VR Project Director and the VRBS Tribal Liaison have been meeting weekly to bi-weekly to staff eligibilities. Additionally, the VR Project Director and her staff will be invited to all applicable upcoming trainings facilitated by VRBS.

Other contact with the 121 programs that occurred in 2021 included:

- VRBS leadership providing technical assistance and support to Fort Belknap 121 Program on implementing Order of Selection (OOS) and continuing to engage in regular communications with their 121 Program leadership to ensure high-quality services to dually enrolled clients;
- Providing outreach to recently recognized Little Shell Tribe;

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- Re-building a caseload of dually enrolled clients in Browning on the Blackfeet Reservation; and
- Participating in Tribal events with 121 programs to provide information on vocational rehabilitation services.

### Mental Health

Previous cooperative agreements with the state agencies providing mental health services included the following provisions:

1. To make available the required supported employment/follow-along services from community rehabilitation programs (CRPs) that are certified mental health providers. Follow- along services may be provided through community based psychiatric rehabilitation and support, and through case management services;
2. To serve persons identified as eligible for mental health service under Medicaid or the Mental Health Service Plan;
3. To strengthen supported employment services to Montana citizens eligible for vocational rehabilitation's supported employment services and for community mental health services;
4. To provide cross-training and technical assistance between our agencies; and
5. To establish and evaluate annual goals for our interagency work towards coordinated vocational and support services.

In late 2021, Department reorganization resulted in the merging of 2 existing divisions: Addictive and Mental Disorders and Developmental Disabilities into one division called Behavioral Health and Developmental Disabilities Division. As such, existing cooperative agreements with the previous Addictive and Mental Disorders Division will be updated in the upcoming year to reflect updated provisions and current leadership.

Despite restructuring and the need for updated cooperative agreements, VRBS leadership has maintained a close working relationship with State of Montana staff working in various mental health programs. Particularly, VRBS leadership have met monthly to bi-weekly with the Individualized Placement and Supports (IPS) programs to improve collaboration and expand IPS offerings across the state. IPS is a research-based model of supported employment for people with serious mental illness based on 8 core principles. There are currently 2 programs providing IPS services on opposite sides of the state, Billings and Missoula.

### Small Business Development Centers

The local VRBS offices and the local Small Business Development Centers (SBDC) all have well established and productive working relationships with each other. SBDCs share information on classes and upcoming offerings to the VRBS offices and VRBS regularly refers clients interested in self-employment to participate in various SBDC trainings and services. The Business Services Specialist is exploring the option of re-engaging in a formalized, state-wide cooperative agreement with the Montana SBDCs.

### The Randolph-Sheppard/Business Enterprise Program (BEP)

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The BEP program continues with two vendors and a third vendor route is ready to be assigned. Recently, a few BLV clients expressed interest in the program, and some have begun taking the necessary steps to become vendors.

### Public Transportation Programs

VRBS has MOUs with the public transportation programs in Great Falls and Billings, which are two of the larger cities in the state. The MOUs commit to procedures to assist VRBS's consumers to obtain documentation necessary to obtain transportation services at reduced fares.

VRBS' transportation coordinator and another VRBS staff attended the 2021 National Mobility Equipment Dealers Association to learn about additional transportation resources.

### Social Security Administration

VRBS works with the Social Security Administration to collaborate on employment incentives and supports and to maximize Social Security Administration/Vocational Rehabilitation (SSA/VR) reimbursement activity through the Ticket to Work Program.

### Cooperation in Training Activities:

VRBS routinely collaborates with other organizations to provide training opportunities for VRBS' staff. The following is a list of collaborating organizations:

- University of Montana - Rural Institute on Disabilities
- Montana State University, Billings - Montana Center for Inclusive Education
- Centers for Independent Living
- Child and Family Services
- Children's Mental Health
- Client Assistance Program
- MonTECH
- Disability Determination Services
- Developmental Disabilities Program
- Montana Association for Rehabilitation
- Veteran's Administration

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

#### State Program under section 4 of the Assistive Technology Act of 1998 (MonTECH)

Disability Employment and Transitions Division (DETD) has a contract with MonTECH to provide the required services of the Assistive Technology Act of 1998. Also, the two programs cooperate through:

1. Having a VRBS representative on the MonTECH advisory board,
2. Having a MonTECH representative on the VRBS Assistive Technology Team.

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3. Training VRBS counselors in available assistive technology and how to access consumer evaluations related to assistive technology.

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

##### Department of Agriculture

There is no Department of Agriculture project related to disabilities serving Montana at this time. However, VRBS is in the process of establishing new connections with various Agriculture projects, such as Rural Employment Opportunities (REO) in Montana, Cutting Fences podcast, and the National AgrAbility Project. Additionally, we are doing outreach to United States Department of Agriculture (USDA), County Extension Agents, and other Ag resources to inform about opportunities for VRBS to coordinate and collaborate as well as share resources.

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

We do not currently have agreements with agencies serving out-of-school youth.

#### 5. State use contracting programs.

##### State Use Contracting Programs Montana

State agencies may purchase supplies and services from sheltered workshops or work activity centers. Such purchases are exempt from competitive bidding laws and rules. The Montana Department of Administration maintains a list of certified sheltered workshops or work activity centers located in the state. The list includes the supplies and services provided by each sheltered workshop or work activity center. (Administrative Rules of Montana 2.5.607).

VRBS does not currently make purchases related to this agreement.

#### (A) Coordination with Education Officials

##### Describe:

##### 1. DSU's plans

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

**Local School Districts:** VRBS has initiated multiple contracts with local school districts to provide pre-employment transition services (Pre-ETS). School districts develop work plans on how they will provide the five required components of Pre-ETS and are reimbursed quarterly based on the number of Pre-ETS services provided to students with disabilities. The school districts are required to provide VRBS with the documentation of Pre-ETS services they are providing to students with disabilities. The agency created a Pre-ETS Bureau in 2019 which includes 7 Pre-ETS Specialists, 1 Data Technician, and the Bureau Chief. The Pre-ETS Bureau is fully staffed and Pre-ETS Specialists are expected to provide coverage to all high schools in Montana. The department is currently exploring the option of adding another Pre-ETS Specialist position in the fastest growing community in Montana, Bozeman.

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A Pre-ETS Bureau staff member is assigned to actively participate on the Montana Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This Council works to ensure that training needs are adequately identified and then addressed through shared training opportunities. Additionally, the Pre-ETS Bureau Chief presented at all the Special Education Director's meeting in the Spring of 2021 and has been invited back to present in 2022.

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

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

The following is from the MOU with the Office of Public Instruction that details the technical assistance responsibilities of each agency.

#### **Consultation and Technical Assistance**

- VRBS will provide consultation and technical assistance to assist LEAs in planning for the transition of students with disabilities from school to post-school activities including Pre-ETS.
- VRBS Counselors will consult with and provide technical assistance to LEA administrators, school counselors, transition specialists, families, individuals, public and private stakeholders, community agencies, and teachers including those who work in special education, general education, career technical fields, etc.
- VRBS will provide consultation and technical assistance through informational sessions, face to face meetings, phone calls, conference calls, skype meetings, webinars, brochures, rack cards, and shared information on the agency website.
- LEA and VRBS staff will be encouraged to collaborate through their Regional Youth Transition Committees and Comprehensive System of Personnel Development (CSPD) Meetings in planning and implementing efforts that are focused on the transition of students with disabilities.
- VRBS counselors will provide consultation and technical assistance during their routine visits to the LEAs, during IEP meetings, at conferences, at training activities, and at other times as requested by OPI or LEAs.
- VRBS will disseminate information about transition services, Pre-ETS, processes for outreach, VR eligibility, scope of VR services, effective practices, training opportunities, funding strategies, assistive technology, and other relevant topics.

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In addition, VRBS has an MOU with Office of the Commissioner of Higher Education (OCHE).

The purpose of this MOU is to develop and adopt principles which will guide the planning and delivery of support services to individuals with disabilities who are mutual clients of Vocational Rehabilitation and Blind Services (VRBS) and students enrolled in the Montana University System (MUS). This MOU has provisions which include:

1. VRBS and the units of the MUS maintain different requirements for determination of eligibility, documentation of disability, and the provision of services or accommodations. This MOU does not require either VRBS or MUS to alter its policies for providing services or supports, and this MOU is not to be used as a basis for determining eligibility for VRBS or MUS services.
2. The units of the MUS through the guidance of the OCHE are required to provide services and accommodations to VRBS' clients to the same extent as they are provided to other students with disabilities, in accordance with Montana state law, the Americans with Disabilities Act of 1990 (PL 101-336) and Section 504 of the Rehabilitation Act (PL 93-112, as amended).
3. VRBS is not prohibited in this agreement from contracting with units of the MUS to provide services or support for VRBS' clients beyond those required to assure equal access to equal educational opportunities.
4. The MOU will provide both parties with the opportunity to enhance communication and the exchange of information regarding services offered by VRBS and the various campuses of the MUS.
5. VRBS and the units of the MUS will work together to enhance cross-referrals of individuals with disabilities, as appropriate to each individual's needs. Personal information about the individual will not be shared without an appropriate release of information.
6. The MUS will not require students who have a disability to apply for VRBS before providing services or support. For students who have applied for VRBS, the MUS will not deny or delay the provision of services or support while VRBS is in the process of determining eligibility for services.
7. VRBS are provided pursuant to an individualized plan for employment (IPE) which is developed jointly by the rehabilitation counselor and the eligible individual. In those situations where referral has been made to campus disability support services, the appropriate disability services staff may also be involved in helping to develop the IPE.
8. The VRBS' rehabilitation counselor and the MUS campus disability support services staff will respect the individual's right and responsibility to fully participate in all decisions regarding his or her vocational future. The IPE shall be developed and implemented in a manner that allows the individual an opportunity to exercise informed choice in selecting an employment outcome, the specific vocational rehabilitation services that are to be provided, the entity that will provide those services, and the methods that will be used to procure the vocational rehabilitation services.



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B. Transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;
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The following are sections of the MOU with the Office of Public Instruction related to related to transition planning.

### **Transition Planning:**

- VRBS and OPI agree to work collaboratively to facilitate and coordinate the smooth transition of students with disabilities from school to post-school activities, including the receipt of Pre-ETS, transition services, and other vocational rehabilitation services.
- Pursuant to 34 CFR 300.321(b)(3), to the extent appropriate, with consent of the parent or adult student, VRBS will be invited to participate in IEP development meetings for shared students with disabilities, depending on availability. VRBS may participate in person or through use of alternative means such as conference calls or other methods. When VRBS is unable to attend the IEP meeting, LEA and VRBS will communicate regarding IEP goals and needed transition services after the IEP meeting.
- VRBS will provide assistance in transition planning for students with disabilities to facilitate development and completion of their IEPs. VRBS can provide information, technical assistance, case consultation and information/referral as needed for eligible or potentially eligible students.
- VRBS will coordinate with non-educational agencies such as juvenile justice, treatment facilities or foster care programs for referrals of co youth with disabilities. These youth will be encouraged to participate in transition services and programs to improve future employment opportunities.
- VRBS will inform LEA teachers of community events such as job fairs, transition fairs, and career days to introduce students with disabilities to possible career goals.
- LEA and VR staff will provide guidance and counseling to students with disabilities regarding post-school options such as employment, post-secondary education, vocational training, and adult education.
- VRBS shall determine the eligibility of all students with disabilities who have applied for VRBS services within 60 days from the date of application.
- VRBS and LEAs will collaborate on the provision of ongoing joint staff training on topics such as development and implementation of IEP's, Pre-ETS, accommodations under Section 504 and limitations on youth entering employment paying sub-minimum wage.

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- VRBS and LEAs will work together to facilitate the local level engagement of potential employers to provide job shadows, paid and unpaid work-based learning opportunities, etc. for students with disabilities;
- VRBS, in collaboration with OPI/LEAs, will provide or arrange for the provision of Pre-ETS to all students with disabilities identified as requiring these services. (The coordination and provision of Pre-ETS is outlined in more detail below.)

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

The following are sections of the MOU with the Office of Public Instruction that deal with financial responsibilities of each agency and related matters.

Roles and Responsibilities of Each Agency:

**Joint Responsibilities of OPI and VRBS:**

- OPI and VRBS shall jointly sponsor training for their respective staff members and LEA personnel. Training shall focus on existing and new State or Federal requirements or initiatives that impact the provision of services by both entities concerning education of individuals with disabilities, their transition from school to employment, vocational rehabilitation services, assistive technology, and the substance of this MOU.
- OPI and VRBS shall ensure that timely notice of training is provided to each other and to the LEAs as appropriate.
- OPI and VRBS shall each designate a single point of contact who will serve as the lead person to coordinate joint training programs, communicate with the respective programs and for collaboration of pre-employment transition services and transition activities.
- OPI staff and VRBS will be available to give joint presentations on pre-employment transition services at conferences such as MYTransitions.

**Responsibilities of OPI:**

- OPI will facilitate and coordinate the smooth transition of students with disabilities from school to post-school employment-related activities, including working with VRBS to ensure the receipt of appropriate Pre-ETS, transition services, and competitive, integrated employment.
- OPI will host an Annual Joint Stakeholders meeting to network, collaborate, communicate and discuss issues regarding services for students and youth with disabilities.
- OPI will encourage LEAs to participate in local multi-agency Transition Team meetings.

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- OPI will request that LEAs identify points of contact to work with the VRBS liaison assigned to each school.
- OPI will disseminate information regarding relevant training and workshops to VRBS including courses available through the Teacher Learning Hub.
- OPI will encourage LEAs to reach out to parents and students to make them aware of coordinated transition services and opportunities. Examples include the Montana Youth Leadership Forum (MYLF) and Movin' On campus programs.
- OPI will encourage LEAs to provide relevant resource materials to stakeholders, parents, families, guardians and students relating to the provision of Pre-ETS and other transition services.
- The OPI Data Accountability Specialist will provide the most recent Special Education State Child Count data upon request. A data driven estimate of the number of students receiving 504 accommodations in the state will also be provided upon request. The OPI Annual Performance Report which includes exit data information for students with disabilities will be shared with VRBS.
- OPI will require LEAs who work with students with disabilities seeking subminimum wage employment to send documentation of transition services/Pre-ETS provided to VRBS within 30 days of service delivery.
- For students with disabilities seeking subminimum wage employment, OPI will require the LEA to provide documentation to VRBS of transition and Pre-ETS services they provided. Documentation will be provided to VRBS within 30 days of service delivery.
- For students with disabilities seeking subminimum wage employment, OPI will require the LEA to provide documentation to VRBS of the student's refusal to participate in transition services.
- OPI will encourage LEAs to provide the required documentation needed by VRBS prior to the provision of Pre-ETS and coordination of services. LEAs will be offered the opportunity to enter into a contract with VRBS to provide Pre-ETS to students with disabilities. LEAs will be provided funding based on the number of students with disabilities who receive Pre-ETS according to the contract fee schedule. LEAs providing Pre-ETS through a VRBS contract will be responsible for securing parent/guardian signatures on student Pre-ETS requests and release forms granting permission for VRBS and LEAs to exchange information.
- OPI will teach LEAs to inform VRBS of students with disabilities who may be in need of transition or pre-employment services through VRBS. OPI will encourage LEAs to inform VRBS as soon as students with disabilities are

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identified as having a disability regardless of whether the student intends to apply for VRBS services.

- OPI shall encourage LEAs to inform VRBS of students with disabilities who are disconnected or in danger or dropping out.
- OPI shall provide technical assistance to LEAs concerning the provision of FAPE including the responsibility to provide assistive technology to assist with the education of students approaching transition to independent living and employment as appropriate.
- OPI shall assist LEAs with coordination of vocationally related services with VRBS for eligible students. Coordination should commence in the early stages of transition. Vocationally related service coordination and corresponding agency responsibilities should be identified in the IEP and included on the student's IPE when appropriate.
- OPI shall encourage LEAs to inform VRBS of IEP meetings in advance to allow sufficient time for VRBS to participate, subject to parental approval. Development of vocational goals and objectives shall occur in collaboration with the IEP Team.
- OPI will identify needed Pre-ETS and transition services, to include as appropriate, a statement of interagency responsibilities or linkages with other entities (e.g., mental health agencies, Social Security Administration) beginning at age 14. OPI will encourage LEAs to work closely with VRBS to ensure that interested students with disabilities are identified and referred for Pre-ETS at an early age.
- LEAs are responsible for providing and paying for any transition service that is considered special education or related services necessary for ensuring a FAPE as required under IDEA. Special Education and related services similar to VR Services may include:
  - Interpreting services;
  - Psychological services;
  - Physical and occupational therapy;
  - Early identification and assessment of disabilities in children;
  - Counseling services, including rehabilitation counseling;
  - Orientation and mobility services;
  - Medical services for diagnostic or evaluation purposes;
  - Work experiences; and
  - Job coaching and support services.

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### **Responsibilities of VRBS:**

- VRBS Counselors will participate in the evaluation process of students who have applied for VRBS and subject to parental consent, in the development of IEPs for students with disabilities
- VRBS shall encourage former students who are still eligible for IDEA services to enroll again in school for further study and training to enhance their opportunities for employment. Such former students shall also be eligible for vocational rehabilitation services customarily provided by VRBS to adults over the age of 21.
- VRBS will provide assistive technology services relevant to functions outside those assistive technology services required to access the educational program.
- After the eligible individual exits the LEA, VRBS will continue to provide vocational services, i.e., vocational assessment, career exploration, job shadowing, vocational guidance and counseling, and other required services outlined in the IPE.
- VRBS will accept referral of students with disabilities during the transition planning process for the provision of Pre-ETS. Students are not required to apply for VRBS services to receive Pre-ETS.
- VRBS will provide consultation with LEA 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 process and provision of Pre-ETS.
- Although VRBS is currently operating under an Order of Selection, an IPE which is consistent with and which takes into consideration the eligible student's Individualized Education Program (IEP), their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice will be developed as soon as resources are available.
- Students with disabilities who apply for VRBS, are determined eligible and complete an IPE may receive services such as evaluation, career guidance and counseling, medical or psychological services, training, job development and placement services, rehabilitation technology or other services to help them enter and maintain employment.
- VRBS will 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 IDEA.

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- VRBS Staff will provide consultation to assist in the identification of eligible and potentially eligible students with disabilities and assessment of their individual needs for Pre-ETS.
- VRBS is responsible for providing information to parents and/or guardians, students and teachers regarding VR eligibility, vocational assessment for employment and postsecondary planning and the CAP.
- VRBS will offer students who wish to apply for VRBS the opportunity to complete and sign a VRBS application form. The student will provide access to available information necessary to determine eligibility and priority for services. Eligibility for VRBS will be determined within 60 days. Students who are only interested in Pre-ETS and do not wish to apply for VRBS services will be given the opportunity to complete and sign the Student Request Form. Verification of disability and student status will be included on the Student Request Form or provided by the student. For students under 18 years of age, the application and Request Form will be signed by a parent or guardian.
- VRBS will obtain written consent for the release of confidential information, pursuant to VRBS policy and procedures, federal and state laws and regulations regarding confidentiality.
- VRBS will share information regarding policies, procedures, guidelines, programs and services for the purpose of improving the access to, and availability of, transition services.
- VRBS will provide brochures and materials about the VR process and services to the LEAs for distribution to students, parents, legal guardians, teachers and others. VRBS staff will also be available to provide information on changes in the law or VRBS policy regarding transition services.
- VRBS will promote employer participation in providing opportunities for work-based learning for students with disabilities.

VRBS is responsible for coordinating the provision of Pre-ETS.

- VRBS will inform OPI staff, teachers, students, legal guardians and parents of the mandates found in the Rehabilitation Act, which require the student with a disability exiting the LEA to be referred to VRBS prior to entering subminimum wage employment.
- For a student with disabilities seeking subminimum wage employment, VRBS will provide the individual with documentation of the required activities within the timelines specified under 34 CFR 397.

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- For students with disabilities seeking subminimum wage employment who refuse to participate in transition services, VRBS will provide documentation to the student of their refusal to participate within the timelines specified under 34 CFR 397.
- VRBS's Youth Services Specialist shall coordinate with OPI and LEAs to develop and promote a seamless transition system. The Youth Services Specialist will take the lead in working with OPI and LEAs to ensure that students with disabilities receive Pre-ETS to prepare them for life after high school.
- The VRBS Youth Services Specialist will oversee the implementation of their "Adopt a School" program. Adopt a School builds relationships between local schools and VRBS by establishing regular office hours at larger high schools for Vocational Rehabilitation Counselors. These counselors connect students with disabilities to VRBS and establish collaborations with special education teachers and 504 coordinators, teachers, school administrators and parents, advocacy groups, and others regarding the role of VRBS in transition.
- The VRBS Youth Services Specialist will meet with staff and other interested parties to develop Pre-ETS contracts, initiate joint training, share best practices and facilitate communication between the parties. The Youth Services Specialist will be the contact person for any questions regarding the provision of services under the Pre-ETS contracts.

### **Financial Responsibilities:**

Montana is a local control state in which LEAs are financially responsible for the costs of services they are mandated to provide under the IDEA and Section 504. OPI shall encourage and promote financial agreements between LEAs and VRBS. Such agreements may be made on an individual basis and in consultation with all parties including students, their families, LEA staff, and vocational rehabilitation professionals.

- OPI and VRBS commit to the implementation of complementary programs to assist with the provision of transition and Pre-ETS to students with disabilities in the state, including students with the most significant disabilities, to enable them to achieve an employment outcome in a competitive integrated setting;
- VRBS will provide funding to LEAs for the provision of Pre-ETS to students with disabilities as outlined in individual contracts and according to the contract fee schedule.
- OPI and LEAs are financially responsible for the cost of services they are mandated to provide under IDEA, Part B; including transition services that are considered special education or related services that are necessary for ensuring a FAPE to children with disabilities. Nothing in this MOU will be construed to reduce any obligations under the IDEA.

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- VRBS is financially responsible for the cost of services for eligible VR students where the purpose of the services is to support an employment goal.
- Under 34 C.F.R. §361.53, the availability of Comparable Services and Benefits, as defined in 34 C.F.R. §361.5(c)(8), will be determined by VR unless such a determination would interrupt or delay the progress of the individual: toward achieving the employment outcome identified in the IPE; an immediate job placement; or the provision of VR services to individual determined to be at extreme medical risk.

The previously mentioned MOU with the OCHE also deals with financial responsibility.

VRBS' clients who attend a unit of the MUS may need reasonable accommodation, including auxiliary aids or services in order to have equal access to the programs and services offered at that particular institution.

The provision and cost of reasonable accommodations are the responsibility of the particular unit of the MUS. For individuals with disabilities who are mutual clients of VRBS and students at a unit of MUS, and are otherwise qualified for such aids or services, the funding source for auxiliary aids and services will be determined on an individual case-by-case basis.

The MUS unit will provide the appropriate VRBS/ office with an estimate of the number of hours and cost of interpreter services which will be billed to VRBS prior to the start of services.

- The VRBS' office must authorize payment for the interpreter services prior to the start of services.
- VRBS and the MUS unit will require full compliance with the Registry of interpreters for the Deaf (RID) Code of Professional Conduct.

In addition:

Physical disabilities are included in the agreement to split evenly the cost of auxiliary aids and services.

Pre-approval of any cost sharing agreements needs to be obtained prior to the start of the service.

Documentation of services delivered must be provided to VRBS that meets or exceeds state auditing requirements.

Additional guidelines relative to interpreter services for eligible clients/students:

- The MUS unit will be responsible for procuring and paying interpreters. VRBS will reimburse for its share of the cost.
- The MUS unit will provide the appropriate VRBS/ office with an estimate of the number of hours and cost of interpreter services which will be billed to VRBS prior to the start of services.



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- The VRBS' office must authorize payment for the interpreter services prior to the start of services.
- VRBS and the MUS unit will require full compliance with the Registry of interpreters for the Deaf (RID) Code of Professional Conduct.

In Addition:

Physical disabilities are included in the agreement to split evenly the cost of auxiliary aids and services.

- Pre-approval of any cost sharing agreements needs to be obtained prior to the start of the service.
- Documentation of services delivered must be provided to VRBS that meets or exceeds state auditing requirements.

<b>D. procedures for outreach to and identification of students with disabilities who need transition services.</b>
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The following section of the MOU with the Office of Public Instruction describes procedures of outreach and identification of students with disabilities needing transition services.

### **Outreach and Identification:**

- VRBS assigns a Vocational Rehabilitation Counselor to each public high school in the state. Counselors shall inform students, families, special and regular education teachers, school administrators, advocacy groups, and others about VRBS.
- Counselors will give presentations and distribute both print and electronic materials that explain transition and pre-employment services along with traditional vocational rehabilitation services. The information provided will include a description of the purpose of VRBS, eligibility requirements, application procedures and scope of services that may be provided to eligible and potentially eligible individuals.
- Students who wish to apply for VRBS services will be offered the opportunity to complete and sign a VRBS application form. The student will provide access to available information necessary to determine eligibility and priority for services. Eligibility for VRBS will be determined within 60 days. Students who are only interested in Pre-ETS and do not wish to apply for VRBS services will complete and sign the Student Request Form. Verification of disability and student status will be included on the Student Request Form or provided by the student. For students under 18 years of age, the application and Request Form will be signed by a parent or guardian.
- OPI shall assist the LEAs with methods and procedures for outreach and identification of students and families who may benefit from VRBS. Assistance with the methods and procedures should include actions needed to engage those

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who are not aware of VRBS, including how the LEAs identify and work with transition aged students who may be in alternative high schools, residential facilities, or are incarcerated.

- VRBS will reach out to eligible and potentially eligible students with disabilities who are in need of transition services and Pre-ETS as early as possible through outreach activities such as information sharing at IEP's, transition planning meetings, career fairs, orientations, back to school nights, work with parent support groups, and other activities.
- VRBS Counselors will work with LEA staff to identify and reach out to all students with disabilities to include those served in special education, those receiving an accommodation under Section 504 of the Rehabilitation Act of 1973, and other students and youth with disabilities. Outreach activities will include students with disabilities receiving school psychological, health, nursing or social work services, and students with disabilities enrolled in an educational program and not in special education. VRBS will also reach out to youth with disabilities who have dropped out of an education program or students who are at risk of dropping out of high school.
- VRBS will inform students with disabilities about the availability of and opportunities to exercise informed choice; including the availability of support services for individuals with the most significant disabilities who require assistance in exercising informed choice throughout the vocational rehabilitation process;
- The designated VRBS Counselor will work closely with each LEA to coordinate, identify students and implement Pre-ETS. VRBS will provide the necessary forms and templates for required documentation including Student Request Forms for Pre-ETS.
- VRBS will work with the LEA to ensure collaboration between transition services provided under IDEA and the Pre-ETS provided by VRBS through direct provision of services or through contracts with LEAs and other providers.
- OPI will provide written guidance to LEAs that Pre-ETS funds can only be used to provide the required Pre-ETS to students with disabilities and that Pre-ETS funds are for additional services to students with disabilities, not to pay for the services required under the IDEA. OPI will continue to work with LEAs to ensure that they follow this guidance.
- Not all eligible or potentially eligible students with disabilities will require all five required activities, however, all should receive all *needed* services, as determined through informed choice and consultation with each student based on their strengths and needs and consistent with their IEP, when applicable.

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

The designated state unit contracts with for-profit and non-profit providers of vocational rehabilitation services. Vocational Rehabilitation and Blind Services (VRBS) operates on a purchase-of-service basis. We have identified and enrolled rehabilitation providers who meet qualification standards established by the designated state unit. VRBS' staff communicates regularly with the providers regarding fee structures, services provided, and consumer satisfaction.

VRBS requires providers to accept a set fee for service, but does not guarantee a minimum level of consumers to be referred. The contracts used with providers follow the master contract developed by the Department of Public Health and Human Services (DPHHS) legal unit to cover liability and related Issues. Services purchased by VRBS from providers are directly approved by the VRBS counselors utilizing an authorization process. The amount of services purchased depends upon the amount and type of services needed by the consumer. Agencies eligible to receive authorizations must be enrolled vendors and must be current service providers of DPHHS.

Disability Employment and Transitions Division offers contracts to providers for the following sets of services:

- Community Rehabilitation Provider (CRP) Career services, including Supported Employment
- Pre-Employment Transitions Services (Pre-ETS)
- Customized Employment Services
- Extended Employment Services (100% state funded)

VRBS is exploring options to offer Individualized Placement and Supports (IPS) contracts to qualified providers in the coming years.

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

**Mental Health and Developmental Disabilities** are important stakeholders in providing supported employment services. DDP contributions are described in c.1., h.1., h.2. and h.3 sections of this document. Mental health contributions are described in c.1. and h.3. sections of this document.

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**Enrolled CRPs:** VRBS works with a number of community-based organizations across the state. Many are enrolled as extended support service providers to assure quality in service delivery for consumers. VRBS has enrolled programs in mental health services, developmental disabilities, as well as other disability organizations to provide these services at the local level.

**Extended Employment Services:** The extended employment service program is the state of Montana's long-term support services program available to individuals who cannot be funded through federal sources. The program provides sheltered and crew-based employment options for individuals who have historically received those services. However, individuals newly enrolling into the Extended Employment program are only eligible to receive supports for competitive integrated jobs. The Extended Employment services program was previously administered and managed by Rocky Mountain Rehab, p.c. (RMR) of Billings, Montana through a contract with the Department of Public Health and Human Services, Disability Employment and Transitions Division. However, the existing contract with RMR sunset on June 30, 2020 and Disability Employment and Transitions Division made the decision to administer and manage the program in-house. With the move from external to internal management, a new case management system was developed to input and warehouse the data related to Extended Employment services. Disability Employment and Transitions Division continues to work on transitioning some of the extended employment's sheltered employment and crew resources to competitive integrated community placement supports. These efforts have been successful, but a larger shift in resources will be necessary to meet the needs of consumers for long-term supports in competitive integrated settings if level funding of the program continues.

#### G. Coordination with Employers

##### 1. VR services; and

VRBS coordinates with businesses through several avenues, including actions and activities that are designed to enhance efforts to identify competitive integrated employment and career exploration opportunities for Montanans with disabilities. These actions facilitate the provision of VR services and transition services, including pre-employment transition services.

These actions include:

- Making direct contact with businesses to learn about their services, market position, goals and workforce needs.
- Attending and participating in community meetings such as Chamber of Commerce functions, Society of Human Resource Managers, Job Service Employer Councils and Economic Development meetings.
- A standalone VRBS Business Services website for businesses to use to learn about the services we have to offer and printed resource materials describing our services.
- Coordination with Montana Workforce Centers to input and collect data on Business Services using the MWORKS data base. This allows VRBS to collaborate

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with the Workforce Centers and document ongoing relationships with business and ensure deliverables and services are provided.

- Improved knowledge of Labor Market Information and how to incorporate this information into Business Services practices
- Business Services Team members are Windmills curriculum trainers. This training is used as an employer-employee awareness program specifically addressing attitudinal barriers.

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

VRBS works and collaborates with employers to provide counselor-purchased and counselor-provided Pre-Employment Transition Services, primarily in the form of Work Based Learning Experiences (WBLE) including informational interviews, job shadows, work-site tours, internships, and paid work experiences in or at competitive, integrated employment sites.

In addition to counselor-purchased and counselor-provided Pre-ETS, VRBS funds Montana Youth Leadership Forum (MYLF - pronounced "My Life") which provides a two-part immersive leadership experience where students and staff members work together to build leadership skills, self-advocacy techniques, and map out short term and long term goals for their future in the first part called Step I. MYLF Step II is available to Step I alumni and is a 5-day long program where students participate in two job shadows/mini internships. These shadows are tailored to the student's individual interests and future career goals. They have the opportunity to attend several workshops including job exploration, workplace skill building, financial integrity, and self-advocacy as well as participate in a community service project. Finally, MYLF Step II participants get the opportunity to meet with the lieutenant governor at the Montana State Capitol in Helena, MT where they watch a presentation given by state employees with disabilities who share how they got their state job and needed accommodations to thrive in the workplace.

### 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

VRBS will continue to collaborate and work towards a cooperative agreement with the Department of Public Health and Human Services, the state agency responsible for administering the state Medicaid plan under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.) that outlines the roles and responsibilities of all parties regarding the delivery of VR services and long-term support services for individuals with the most significant disabilities who have been determined to be eligible for home and

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community-based services under a Medicaid waiver, Medicaid state plan amendment, or other authority related to a state Medicaid program.

It is anticipated that additional cooperative agreements with the state Medicaid agency and service agencies funded through Medicaid will be developed in the upcoming years.

VRBS works closely with the Social Security sponsored Work Incentives Planning and Assistance (WIPA) project in Montana to assist consumers to understand the impact of working on their benefits, including Medicaid. Also, VRBS invested in training through Social Security Administration for four Vocational Rehabilitation Counselors to become Community Partner Work Incentives Counselors (CPWICs) allowing better access to benefits counseling for VRBS clients receiving SSI and SSDI by providing individualized, work incentive counseling services.

The description of how VRBS will collaborate with the Developmental Disabilities Program's Medicaid Waiver Program and the Medicaid services through Mental Health are described in a future section.

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

VRBS has had a long and productive relationship with the Developmental Disabilities Program (DDP). The program continues to sign off for extended long-term support services for many individuals with significant disabilities. As mentioned previously, cross-training and technical assistance between our agencies to make available the required supported employment services continues to be ongoing.

- The short-term services to be provided through CRPs enrolled by VRBS.
- The long-term follow-along services to be provided by DDP through developmental disability providers. DDP services are funded through the state general fund and the Medicaid home and community waiver.

In late 2021, state reorganization resulted in the merging of two existing divisions: Addictive & Mental Disorders and Developmental Disabilities into one division called Behavioral Health and Developmental Disabilities Division. As such, existing cooperative agreements with the previous Developmental Disabilities Division will be updated in the upcoming year to reflect updated provisions and current leadership.

Despite reorganization and the need for updated cooperative agreements, VRBS leadership has maintained a close working relationship with DDP leadership through monthly meetings which will continue in the coming years. In addition to the monthly meetings, DDP and VRBS leadership worked extensively to publish a joint procedure for field staff in both programs to navigate referrals and long-term sign offs for extended long-term support services.

### 3. The State agency responsible for providing mental health services.

As mentioned in section c.1., updated cooperative agreements with the Behavioral Health and Developmental Disabilities Division will be completed in the next year following significant reorganization within the Department. Despite reorganization and

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the need for updated cooperative agreements, VRBS leadership has maintained a close working relationship with State of Montana staff working in various mental health programs. Particularly, VRBS leadership have met monthly to bi-weekly with the Individualized Placement and Supports (IPS) programs to improve collaboration and expand IPS offerings across the state. IPS is a research-based model of supported employment for people with serious mental illness based on 8 core principles. There are currently 2 programs providing IPS services on opposite sides of the state, Billings and Missoula. VRBS is exploring the option of offering IPS specific contracts in the coming years to providers with the appropriate training and certifications in IPS service delivery.

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

1. Data System on Personnel and Personnel Development

A. Qualified Personnel Needs.

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

- i. The number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;
- ii. The number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and
- 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 Comprehensive System for Personnel Development (CSPD) information is currently maintained by the Quality Assurance Officer (QAO) of the Vocational Rehabilitation and Blind Services (VRBS) program. The QAO developed and maintains a spreadsheet comprised of all personnel and each member's respective CSPD status: 1) those who hold both a master's degree and CRC, 2) those who are in training assignments working toward their master's degree and CRC, and 3) those who have been newly hired and are preparing to begin graduate studies.

The spreadsheet is updated whenever a new staff member is hired, signs a CSPD agreement, enters graduate school, earns a master's degree, and obtains a credential (e.g., CRC). The information is regularly shared with the program administrator to assist in the staffing decisions.

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The following table illustrates the number served per year, the number of personnel per position, and the approximate caseload size of case carrying staff member.

Please note that the number served progressively decreased after VRBS entered Order of Selection (OOS), closing Category III in the fall of 2015, Category II in the summer of 2016, and Category I in the spring of 2017. Category I is now fully open and clients from Category II have begun receiving invitations for services leading to higher volume of clients served that in the two previous fiscal years.

	<b>FY2020</b>	<b>FY2021</b>
<b>Number Served per Year</b>	<b>4004</b>	<b>3720</b>
<b>Number of Personnel Per Category</b>		
Counselors (regular VR and BLVS counselors carrying full caseloads)	23	25
Counselor Supervisors (regular VR and BLVS supervisors carrying partial caseloads)	13	13
Administrative Staff	35.5	33.5
Pre-ETS Specialists	5	7
Orientation & Mobility Specialists	4	4
Vision Rehabilitation Therapists	5	5
<b>Total Staff</b>	<b>85.5</b>	<b>87.5</b>
<b>Approximate Caseload Size per Position per Year</b>		
Counselors Carrying Full Caseloads	<b>9569</b>	<b>69</b>
Counselor Supervisors Carrying Partial Caseloads	<b>5742</b>	<b>42</b>

In FY2020, VRBS served 4004 Montanans with disabilities, wherein each counselor carrying a full caseload served approximately 95 consumers each, and counselor supervisors carrying a partial caseload served approximately 57 consumers each.

In FY2021, VRBS served 3720 Montanans with disabilities, wherein each counselor carrying a full caseload served approximately 69 consumers and counselor supervisors carrying a partial caseload served approximately 42 consumers.



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The population in western Montana continues to grow, while the population in eastern Montana decreases. Yet, Eastern Montana has such large travel distances for counselors to meet with consumers that a reduction of staff in less populated parts of the state is not feasible.

When all the positions are filled, VRBS has had enough staff to provide vocational rehabilitation services throughout the state. However, as the population continues to grow, it is conceivable the need for additional staff will grow, too. Additionally, as mentioned elsewhere in this report, VRBS recently added the Pre-Employment Transitions Bureau to better meet the transition needs of youth with disabilities. This Bureau added seven Pre-ETS Specialists to provide services across the state. CSPD reports have been updated to reflect growth in this area.

<b>Personnel by Job Title</b> (Current as of 1/31/2022)	<b>Total Positions</b>	<b>Filled Positions</b>	<b>Vacancies</b>	<b>Projected Vacancies Over Next 5 Years</b>
Division Administrator	1	1	0	
Bureau Chiefs (Program Support; Field: Pre-ETS: Blind and Low Vision)	4	4	0	
Prog Managers (Independent Living; Deaf; Soc Sec; Quality Assurance; Transportation; Business Services)	6	6	0	1
Central Office Admin Support Staff	1.5	1.5	0	
Counseling Staff (Counselors and Counselor Supervisors for both General Program & BLVS Program)	38	37	1	5
Pre-ETS Specialists	7	7	0	
Orientation and Mobility Specialists	4	2	2	
Vision Rehabilitation Therapists	5	4	1	
Field Administrative Support	20	20	0	4

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Tech Sup (Budget Analysts; Business Analyst; Technology Assistant: Contract Specialist)	5	5	0	
<b>Totals</b>	<b>91.5</b>	<b>87.5</b>	<b>4</b>	<b>10</b>

### 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;
- ii. The number of students enrolled at each of those institutions, broken down by type of program; and
- iii. The number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

In the system described above, the Quality Assurance Officer maintains records regarding the number of employees in CSPD plans, the institutions in which they are completing graduate studies, and the dates upon which they complete earn their respective degrees and credentials.

Montana VRBS requires professional counseling and supervisory staff to have a master's degree in Rehabilitation Counseling. The Certified Rehabilitation Counselor credential is preferred. Toward that end, VRBS has incentivized the credential by providing a pay raise for those who earn their CRC credential.

The agency seeks to hire fully qualified individuals whenever possible. However, due to the rural location and lower wages, it is difficult to recruit fully qualified candidates. Consequently, VRBS often hires excellent candidates who are willing and able to participate in a training assignment, wherein they learn (complete master's degree) while they earn.

Newly hired trainees are provided information (CSPD Agreement and Graduate School Tip Sheet) and support to help them select a graduate school that offers both online education and the Rehabilitation Services Administration (RSA) Scholarship. To mitigate expense of graduate school, VRBS has worked hard to foster positive relationships with schools offering the RSA scholarship.

Montana State University is the only institution in Montana that offers Rehabilitation Counseling degrees. Unfortunately, MSU does not offer the RSA scholarship.

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Understandably, trainees are encouraged to seek training at institutions offering the RSA scholarship.

Currently, 100% of VRBS professional counseling and supervisory staff (45) meet the agency's CSPD standard: 16 are Certified Rehabilitation Counselors, and 29 are in CSPD plans. Of the 29 in CSPD plans, 10 are in graduate school, 3 are eligible to sit for the CRC exam, and 16 are preparing to enter graduate school. In addition to professional counseling staff, there are also two staff in the Blind and Low Vision bureau attending graduate school for Vision Rehabilitation Therapy.

The following tables illustrate the data noted above.

<b>Institution</b>	<b>Degree Offered</b>	<b>Number Graduated in FY2020</b>	<b>Number Graduated in FY2021</b>	<b>Number Currently Enrolled</b>
<b>Utah State University</b>	Rehabilitation Counseling	2		2
<b>University of Kentucky</b>	Rehabilitation Counseling	1		
<b>University of Massachusetts</b>	Rehabilitation Counseling			6
<b>University of Massachusetts</b>	Vision Rehabilitation Therapy			1
<b>George Washington University</b>	Rehabilitation Counseling			1
<b>Western Michigan University</b>	Orientation & Mobility			
<b>Western Michigan University</b>	Vision Rehabilitation Therapy			1
<b>University of Wisconsin-Stout</b>				1
<b>Total</b>		<b>3</b>		<b>12</b>

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

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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.

### **Recruitment & Retention**

VRBS has previously experienced challenges attracting qualified candidates due to low base wage, especially the trainee base wage. Through review and reclassification of positions, wages have been increased to a base rate of \$21.28 for an individual hired in a training assignment and \$23.78 for those fully qualified. This has aided the agency in hiring qualified, competent staff to provide services to clients.

Montana has no state university training for either Vision Rehabilitation Therapy or Orientation and Mobility. Therefore, attracting highly qualified professionals in these areas will continue to be a challenge for BLVS. Likewise, Blind and Low Vision Services (BLVS) staff continue outreach efforts to attract candidates from across the country to fill Vision Rehabilitation Therapist and Orientation and Mobility Specialists. In other cases, BLVS must hire someone locally on a training assignment and pay for their schooling.

Montana VRBS believes in a personnel body that is representative of its constituents. Likewise, VRBS works with Montana colleges and other entities to recruit individuals from minority backgrounds, including Montana's tribal peoples and persons with significant disabilities. VRBS takes affirmative action to employ and advance in employment, qualified individuals of minority all minority status, including Native Americans and with people with significant disabilities.

### **Preparation**

All new employees undergo VRBS Foundations Training to 1) establish an understanding of the values that underpin the mission of our profession, and 2) teach best practices that promote efficiency and excellence in the service of our consumers.

All employees are encouraged to build leadership skills via service on a variety of task teams wherein challenges are addressed, and solutions are developed. Current teams include Procedure Team; Quality Assurance Team; Youth Services Team; Business Services Team; Life Support Team (Administrative Support); Customized Employment Team; Self-Employment Team; and the Assistive Technology Team.

### **3. Personnel Standards**

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

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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

As noted above, VRBS requires a master's degree for its professional staff (i.e., Rehabilitation Counselors, Orientation and Mobility Specialists, and Vision Rehabilitation Therapists) and desires that professional staff obtain relevant credentials (i.e., CRC; CVRT, COM).

As of this writing, 100% of Counseling staff and 67% Blind and Low Vision Staff meet the CSPD standard of Montana VRBS. (One Vision Rehabilitation Therapist position is currently vacant and there are two vacant Orientation and Mobility Positions.) See tables below.

	Counselors & Counselor Supervisors with CRC	Counselors & Counselor Supervisors in CSPD Plans	<b>Total Number of Counselor &amp; Counselor Supervisors who meet the VRBS CSPD Standard</b>
Number	15 of 38	23 of 38	38
Percentage	.39%	.61%	<b>100%</b>

	Certified Orientation & Mobility Specialists	Certified Vision Rehabilitation Therapists	<b>Total Number BLVS Staff who meet the VRBS CSPD Standard</b>
Number	2 of 4	4 of 5	6 of 9
Percentage	50%	.80%	<b>.67%</b>

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.

Since our last report, VRBS has made significant progress in preparing staff to meet the needs of our dual customers, individuals with disabilities and employers in a 21<sup>st</sup> century workforce.

Specifically, VRBS has:

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1. Produced outreach materials to educate employers on the services available to them from VRBS
2. Provided Windmills training to employers to increase the disability awareness in the workplace
3. Committed to maintained regular employer outreach efforts to carry out the Business Services mandates of WIOA
4. Conducted annual outreach to those working in jobs paying subminimum wage to educate them about the option of work in competitive integrated settings
5. Developed a comprehensive pre-employment transition service platform from which to serve youth with disabilities in concert with educators and community rehabilitation providers, moving them through high school graduation to post-secondary education and competitive employment.

### J. Statewide Assessment

(Formerly known as Attachment 4.11(a)).

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

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

State Vocational Rehabilitation programs are required to conduct a statewide assessment every 3 years. The currently completed needs assessment was a statewide assessment, jointly conducted by Vocational Rehabilitation and Blind Services (VRBS) and the State Rehabilitation Council (SRC). This assessment examined the need to identify the rehabilitation needs of individuals with disabilities, particularly the vocational rehabilitation needs of:

1. Individuals with the most significant disabilities;
2. Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program; and
3. Individuals with disabilities served through other components of the statewide workforce investment system.
4. The needs of youth and students with disabilities related to Pre-Employment and Transition Services (Pre-ETS), and
5. The needs of individuals with disabilities for transition career services and Pre-ETS and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act (IDEA).

Additionally, the assessment was expected to address needs related to establishing, developing, or improving community rehabilitation programs (CRPs).

From October 1, 2016 to December 31, 2019 VRBS completed a series of assessment activities to gather input regarding the rehabilitation and employment service needs of individuals with disabilities within the state. These activities included:

1. Direct input, in the form of the consumer satisfaction survey, focus forums, survey responses and communication with community partners, and the public hearings;

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2. Other indicators such as State Rehabilitation Council input and demographic information such as prevalence of disability, employment, earnings, and,
3. Priorities from the previous strategic plans as well as other programs including federal and legislative priorities.

The information and data collected for the Comprehensive Statewide Needs Assessment and published here heavily informs the strategic planning process that will take place in the spring of 2020 to complete the next 3-year strategic plan for Montana VRBS. The information found in this document highlights the needs of Montanans with disabilities, and this data is relevant to the following activities:

1. Providing data and a direction for the development of the VRBS strategic plan and the VRBS portion of the Montana Combined State Plan;
2. Determining needed services and adjustments to the service delivery system;
3. Assessing the vocational rehabilitation needs of un-served/under-served populations including individuals with the most significant disabilities and minorities; and
4. Identifying gaps in vocational rehabilitation services.

### **Method:**

Consumer satisfaction surveys are sent to consumers of VRBS each three years of the assessment. Due to VRBS being on Order of Selection (OOS) throughout the assessment period, there were less clients exiting the VRBS program and less surveys sent out as a result. Approximately 2,700 total surveys were sent out over the three-year period with response rates between 8.3% and 13.6%.

Public hearings were held during the three-year assessment period, with each providing general input on improving the VRBS program and input on the draft goals, activities and performance measures of the VRBS' strategic plan. Participation at the statewide public hearings typically ranges between 20-40 individual stakeholders. Written and electronic comments are also accepted.

Rehabilitation needs of individuals with the most significant disabilities that were identified through the CSNA include:

- VRBS needs to continue addressing Order of Selection (OOS) and remedy the financial situation as OOS has reduced choices for consumers including those with the most significant disabilities
- VRBS program needs to develop processes for maintaining communication with clients during staff turnover particularly for those clients with the most significant disabilities
- More post-secondary training options are needed for individuals with the most significant disabilities
- Extended Employment program, providing long-term supports to individuals with the most significant disabilities in Montana, is crucially important and funding to EE desperately needs to be at least partially restored particularly for people waiting for DD services, persons with mental health issues, and those with other most significant disabilities depend on long-term supports to remain employed in the community.
- VRBS needs to serve individuals in residential psychiatric treatment centers

B. Who are minorities;
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Native Americans represent the largest minority in Montana and there are seven reservations located in the state. Five of the seven reservations are served by projects funded under Section 121 of the Rehabilitation Act to provide vocational rehabilitation services to Native Americans living on or near the reservation. VRBS maintains ongoing communication with the directors of the Section 121 projects in order to assess the needs of Native Americans with disabilities in Montana.

The five directors of the Native American 121 VR Programs were sent a survey in 2019 asking the following five questions:

1. Does your program have a relationship with the local Vocational Rehabilitation and Blind Services office?
2. How often does your staff have contact with the State VR staff?
3. How do you coordinate services (adult and student) with the local VRBS office?
4. Your suggestions on how to co-serve consumers in both programs.
5. How can VRBS be more useful to your program?

Two directors responded to the request for input. Of the two respondents, one program expressed they did have a relationship with the local VRBS office with little to moderate amount of contact with the local VRBS office staff and the other said they did not have a relationship with their local VRBS.

In response to the third question about coordination of both adult and student services, one program director expressed that the coordination of services is “ongoing” and the other stated “we haven’t had contact with VR in several years.”

The respondents’ suggestions on how to best co-serve clients and how VRBS can be more helpful to the 121 programs were:

- Have more regular contact with each other.
- Designate a specific contact at the local VRBS office for each 121 program and specify a contact at Central Office for all 121 programs as well.
- Interview consumers to identify needs and how to improve collaboration.
- Identify additional sources of funding to meet the needs of the clients.

Other rehabilitation needs noted in the CSNA include:

- Increase outreach and communication with tribal partners, including 121 programs, health and human services providers, and high schools.
- Improve collaboration and partnerships with tribal colleges.

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

As a result of Order of Selection (OOS), the disability makeup of the VRBS caseload and the case load size significantly changed over the assessment period. Between March 2017 and August 2018, no new clients were entering into IPE development and caseload sizes began dropping across the state as existing participants were exited from the program and few to no new clients were entering into services. Beginning in August 2018, individuals with the most significant disabilities from Category 1 were slowly



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offered IPE development. Those that were entering into services were only those individuals with the most significant disabilities from Category 1.

The unserved or underserved during the assessment period were Montanans with disabilities in Categories 2 and 3 and from March 2017 through the end of the assessment period, most individuals in Category 1 as well. The primary rehabilitation need of this population is for VRBS to improve the current financial situation in order to open categories and serve the people waiting.

### D. Who have been served through other components of the statewide workforce development system; and

Needs of individuals served through other components of the statewide workforce development system that were identified through the CSNA include:

- Constituents expressed frustration about not being able to count on Vocational Rehabilitation to help people due to Order of Selection (OOS). Partner agencies don't feel like they can or should refer people to VR because they're not able to handle new cases.
- Improve services for middle-aged folks, who are just discovering their disability
- VRBS needs to address the loss of Full Time Employees (FTEs) within VRBS and associated impact on clients and other WIOA programs.

### E. who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

According to the Program Year 2019 Quarter 1 Data Dashboard from the Rehabilitation Services Administration there were 5981 students with disabilities reported. The number of students receiving Pre-ETS was 1108 with 778 receiving Pre-ETS who are potentially eligible and 332 who had received Pre-ETS prior to application for VRBS services.

Also of note is the data related to number of students served under the Individuals with Disabilities Act (IDEA) that are between the ages of 18 and 21. Data captured during the fall of 2017 indicates that nationally 336,643 students aged 18 to 21 were being served under IDEA Part B. Of those 336,643 students, 450 were in Montana. This is particularly important data for Montana because Montana is the only state that funds special education services to age 19 as opposed to age 21 in other states. There are likely hundreds of students that could be served under IDEA in Montana if Montana had a funding structure similar to other states, that is, allowing students with disabilities to remain enrolled in school until age 21. This difference also highlights the importance of providing Pre-Employment Transition Services (Pre-ETS) services to a large number of youth with disabilities who would be enrolled students with disabilities in most other states.

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Several rehabilitation needs of youth with disabilities were revealed during the assessment period, including:

- VRBS needs to build capacity in Pre-ETS programs to reach eligible students with disabilities statewide.
- VRBS needs to expand outreach efforts to qualified students, their families, and schools.
- VRBS needs to Improve the application process to enroll students in Pre-ETS services.
- VRBS needs to enhance collaboration and relationships between VR Counselors, Pre-ETS specialists, and students with disabilities.
- VRBS needs to improve outcomes for students with disabilities as they transition out of Pre-ETS

### 2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

Several needs related to establishing, developing, or improving CRPs in Montana were revealed during the assessment period, including:

- Given the changes with WIOA and resulting changes in the Montana VRBS program, improved training for CRP staff from VRBS needs to be provided.
- A guide or manual for CRP staff needs to be developed to help with supporting new CRP staff.
- Communication between VRBS and CRPs needs to be clearer and more consistent.
- CRPs expressed that unknowns related to how many people come off the waiting list at a particular time and in a particular location hinder their ability to plan for appropriate staffing levels. Additionally, improved communication from VRBS regarding the process and numbers of individuals coming off the waiting list were requested.
- Improved communication between the CRP involved with the client as well as DDP and VRBS would be beneficial to service coordination.
- Expansion of CRP services in rural areas or areas where limited providers are available to assist consumers.
- Expansion of providers offering Customized Employment services.
- Provide more training to CRPs on accommodations and working with employers.

State Employment Leadership Network (SELN) participation in the past showed a lot of coordination and communication between VRBS, DDP and CRPs. This collaboration and connection should be resumed, and community should be able to provide input on implementation.

### 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.

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The following needs were identified in the assessment inducing:

- Clarify how and which Pre-ETS services the CILs can offer to youth
- Develop a list of Pre-ETS providers that includes which services each provider offers and share that list with the CILs
- More communication and direction on Pre-ETS and WIOA initiatives is needed to facilitate coordination and implementation.
- CRPs asked that the language and service levels be more clearly defined to assist with Pre-ETS billing. Some providers wanted to know what other Pre-ETS were being provided in the community by non-CRPs and the details of the Pre-ETS being provided through school contracts.
- VRBS be more active in communicating with schools, parents, the community, and providers about what Pre-ETS are and all the options available to access those services.
- VRBS needs to develop a service structure outside the schools for youth with the most significant disabilities ages 19-21.
- Further development and refinement of the Pre-ETS program

VRBS needs to continue to build and nurture the relationship with OPI to leverage some of that agency's data tools in order to work with all schools in the state in a more comprehensive manner

### K. Annual Estimates

Describe:

#### 1. The number of individuals in the State who are eligible for services;

According to 2021 Census data, 9.2% of Montanans under the age of 65 years lives with a disability which is 101,592 individuals.

#### 2. The number of eligible individuals who will receive services under:

##### A. The VR Program;

In FFY22 VRBS anticipates serving 3,000 clients at a case cost of \$9.2 million using Title I funding, with 345 consumers becoming employed.

##### B. The Supported Employment Program; and

Our program also anticipates that a total of 200 consumers will receive Title IV-B Supported Employment services at an overall case cost of around \$300,000 with an estimated 30 consumers employed in FFY22.

#### C. Each priority category, if under an order of selection;

	Title I or VI	Estimated Funds	Estimated Number to be Served in FFY22	Average estimated cost of services per case in FFY22
<b>Priority Category 1</b>	Title I	\$4,600,000	2000	\$3,000

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<b>Priority Category 2</b>	Title I	\$1,050,000	1070	\$2,625
<b>Priority Category 3</b>	Title I	\$150,000	35	\$2,143
<b>Priority Category 1</b>	Title VI	\$300,000	200	\$1,500
<b>Totals</b>		\$9,183,755	3305	

For Federal Fiscal Year (FFY) 2022 VRBS estimates that total projected program costs for both administrative and client services funded under Title I and Title VI-B will be \$13.5 million including both federal and non-federal funds, and using both original year of appropriation and carryforward FFY21 funds. VRBS projects an estimated overall deficit for FFY 2022 in Title I funds and, as such, will continue to operate under an order of selection.

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

It is estimated that at the end of FFY 2022, 1030 individuals will be eligible for VR services, but will be on the waiting list for services because of order of selection.

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.

This information for FFY 2022 can be found in the table in Section 2. c..

### L. State Goals and Priorities

The designated State unit must:

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

VRBS and the State Rehabilitation Council (SRC) have developed the goals and priorities, which are listed below. VRBS and the SRC review the progress on the goals regularly.

2. Identify the goals and priorities in carrying out the VR and Supported Employment programs.

Access and Quality. Montanans with disabilities can access high-quality competitive, integrated employment.

- Increase the number of clients served by VRBS and the percentage of VRBS clients employed, retained, and promoted in competitive, integrated jobs.
- Improve the quality of VRBS services.
- Increase the percentage of clients meeting and exceeding WIOA performance indicators.

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Youth Engagement. Montana youth with disabilities are effectively engaged in vocational exploration and work readiness training.

- Increase participation of students (14-21) with disabilities engaged in high quality Pre-ETS.

Equity. All people with disabilities are engaged and valued for their abilities and contributions to our workforce, with extra emphasis on reaching underserved and unserved populations.

- Increase resources for people who are Deaf or hearing impaired.
- Increase blind and low vision supports.
- Increase resources and access to rural and migrant communities as well as language minorities.
- Increase collaboration with 121 American Indian Vocational Rehabilitation Programs and resources to American Indians on reservations and in urban settings.
- Increase support for people with disabilities in institutional settings.
- Increase support for youth in foster placements.

Coordination. Montana's Workforce system is coordinated to effectively support people with disabilities and their employers.

- Increase coordination with partner organizations.
- Enhance coordination with businesses/employers.
- Enhance eligibility and navigation processes for clients.

Organizational Sustainability. VRBS is a stable, sustainable organization.

- Increase fiscal stability, staff professional development, staff engagement and satisfaction.

### 3. Ensure that the goals and priorities are based on an analysis of the following areas:

See comments in each specific section.

#### A. The most recent comprehensive statewide assessment, including any updates;

VRBS, the SRC, and myriad other stakeholders met in May 2020 to complete strategic planning. As a part of that strategic planning session, the most recent comprehensive statewide needs assessment (CSNA) was reviewed and data and findings from the CSNA used to set goals and strategize steps to accomplish those goals. Since the development of the current strategic plan, VRBS leadership and the SRC have met multiples times and regularly discuss progress made toward the jointly created goals and strategies. Additionally, the CSNA is a regular agenda item for SRC meetings, and those discussions were used in development of this state plan.

#### B. the State's performance under the performance accountability measures of section 116 of WIOA; and

The performance accountability measures will be shared with SRC and all levels of VRBS leadership on an ongoing basis in the coming years. During strategic planning the

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performance accountability measures were shared with SRC and other VRBS stakeholders present during the strategic planning session held in May of 2020 and those informed the goals, objectives and strategies identified above.

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.

RSA monitoring report was received October 13, 2020 from the on-site monitoring that occurred in 2019. The informal recommendations given to VRBS from the on-site RSA monitoring were presented to the council and presented during the VRBS strategic planning session held in May 2020. Not all of the challenges discovered during monitoring have been addressed, and the program continues to work with RSA to resolve findings.

### 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.

VRBS has established the following three priority categories under order of selection: Priority Category One - Most Significantly Disabled (MSD): Eligible individuals with serious functional limitations in three or more functional capacities, and who will require multiple services over an extended period of time.

SD Priority Category Two: Eligible individual(s) with serious functional limitations in one or more functional capacities, and who will require multiple services over an extended period of time.

- OR - The individual is a recipient of Social Security Disability Benefits (SSDI) or Supplemental Security Income (SSI) as a result of disability or blindness.

NSD Priority Category Three: All other eligible individuals with disabilities.

### B. The justification for the order.

Montana's Vocational Rehabilitation and Blind Services program (VRBS) does not estimate we will be able to serve all eligible individuals with the available resources; therefore, we have implemented an order of selection.

VRBS first entered into order of selection in March of 2014 when it closed Category 3 and was able to be out of the order of selection for a period of time before reopening category 3. However, it was necessary to Close Category 3 again in October 2015. Category 2 was closed in July 2016. Category 1 was closed in March of 2017 and was opened June of 2021. All category closures were made because VRBS calculated that it could not serve all eligible individuals with the available financial and/or personal service resources.

The Workforce Innovation and Opportunity Act (WIOA) requires a 15 percent reserve for pre-employment transition services. As such, VRBS anticipates the required service to students with disabilities who are eligible or potentially eligible for services will necessitate VRBS to focus its efforts to provide services to local school districts. These

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efforts, both in terms of financial and staff resources, will be above and beyond the services that were historically provided solely through case services in years past. We are also currently working through a Maintenance of Effort penalty through FFY2022 which decreases our ability to serve all eligible individuals for VRBS.

### C. The service and outcome goals.

The time frames for achieving these goals by priority category are depicted in the table below:

Priority Category	Number of Individuals to be served	Estimated number of individuals who will exit with employment after services	Estimated number of individuals who will exit without employment after services	Time within which goals are to be achieved
1	2000	140	400	Immediately to two years
2	1070	58	200	Immediately to two years
3	35	20	5	Immediately to two years

### D. The time within which these goals may be achieved for individuals in each priority category within the order.

This information is provided in the previous section.

### E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and

Those individuals in Priority Category One will have the highest priority and will be served first, followed by individuals in Priority Category Two, and finally by those individuals in Priority Category Three. All individuals within a higher priority category will be served before any individual in the next lowest priority category. Regardless of which category closure scenario is in effect, eligible individuals will be released from the statewide waiting list first by priority category, most significant to least significant; and then by order of application date, oldest to newest.

### 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.

The DSU is not waiving the established order of selection for individuals who required specific services or equipment to maintain employment.

### N. Goals and Plans for Distribution of title VI Funds. Describe:

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1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.

The goal of the state's supported employment program is to maintain a system whereby individuals with the most significant disabilities are afforded the opportunity to participate in competitive integrated employment.

Supported employment services are provided on a statewide basis through the Title VI, Part B funds. Individuals eligible for supported employment are those individuals with the most significant disabilities for whom competitive integrated employment has not historically occurred, or for whom competitive integrated employment has been interrupted or intermittent as a result of a significant disability, and who, because of the nature and severity of their disabilities, has had supported employment identified as the appropriate employment service followed by long term supports after the VR case is closed. Fund allocation on a statewide basis ensures an equitable statewide service delivery.

Vocational Rehabilitation and Blind Services (VRBS) will continue to encumber Title VI, Part B funds on a fee-for service basis. When supported employment services exhaust Title VI, Part B funds, then Title I funds will be utilized to provide needed supported employment services. At this time and in recent years, this procedure has made it possible to provide all planned supported employment services for individuals receiving VRBS services. If in the future VRBS determines that there are inadequate funds to provide all needed supported employment services for individuals on the VRBS caseload then supported employment will be funded with Title I dollars.

In addition, VRBS prioritizes the use of supported employment models that maximize integration of persons with the most significant disabilities in real work sites, doing meaningful work. VRBS does not support the use of segregated bench work, sheltered, enclave or segregated crew models.

VRBS has implemented and continues to refine the Customized Employment program to enhance competitive integrated employment opportunities for individuals with the most significant disabilities in Montana. For calendar year 2021, VRBS issued CE-specific contracts for the first time to 9 providers in various locations of the state with specialized certifications from Marc Gold & Associates. For calendar year 2022, 11 CE contracts were issued. Title VI funds may be used to purchase Customized Employment services if it is determined that the client meets supported employment eligibility criteria and long-term supports will be needed despite the customized job created for the client.

1. 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

Section 603(d) of the Rehabilitation Act requires a State to reserve half (50 percent) of its allotment for the provision of SE services, including extended services, to youth with the most significant disabilities. Once employment is obtained, VRBS funds the



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employment supports for youth with the most significant disabilities with the funds reserved pursuant to section 603(d) for 90 days minimum. Then the counselors may fund these supports longer (up to 4 years) while the counselor simultaneously is pursuing the availability of other long-term funding for the employment supports.

VRBS does not discontinue funding for the youth's extended services until other funding is secured. VRBS maintains an accounting structure to track these expenditures as well as written procedure and internal controls to monitor the period of time in which VRBS is funding these supports under the service category Extended Services so as not to exceed 4 years.

**B. How the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.**

VRBS has identified the following sources of funding for long-term on-the-job support services. Each funding source has a different group of providers for the services, but most of the extended services providers are CRPs enrolled with VRBS:

- A. Extended Employment Services – State General Fund
- B. Mental Health partnership and upcoming cooperative agreement renewals
- C. Developmental Disabilities partnership and upcoming cooperative agreement renewals
- D. Private pay to CRP (CRP is signoff)
- E. Natural supports
- F. Medicaid waiver program
- G. Utilize employment work expenses as an option for Social Security recipients.

**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.

The comprehensive needs assessment is the primary process for identifying areas related to innovation. The State Rehabilitation Council (SRC) and its resource plan are conducted using innovation and expansion funds.

Other activities related to expanding services are detailed below in activities to achieve goals and priorities.

- 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.

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VRBS works closely with MonTECH (the Montana State operator/implementing agency for the state grant AT program) who has two offices located on the two halves of the state (one in Missoula and one in Billings). MonTECH is also available to demonstrate equipment and assess technology needs through the use of video conferencing. VRBS will continue to have a VRBS representative on the MonTECH advisory board, a MonTECH representative on the VRBS Assistive Technology Team and collaborate to provide needed training to VRBS counselors in available assistive technology and how to access consumer evaluations related to assistive technology.

Each BLVS regional office has a rehabilitation teacher who has background in technology related to blind and low vision and each regional office has some demonstration equipment available for consumers to test before purchase. MonTECH provides additional demonstration equipment to the three BLVS offices outside of Missoula or Billings.

VRBS recently invited MonTECH to present to our Community Rehabilitation Provider network and to present on Montana Assistive Technology Loan Program to all staff.

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.

VRBS provides outreach through a variety of means.

- There is an assigned VR counselor liaison for each 121 Program in Montana.
- Each VR counselor in the state is assigned a travel territory to ensure individuals with disabilities in our rural counties have equal access to rehabilitation services.
- VR Counselors attend monthly community management team meetings in their local areas, participate in job fairs and other local events to promote VR services and solicit applications for services
- VRBS Leadership partner with other federal, state, and local agencies and programs to promote VR services, solicit partnership and collaboration among programs to better serve mutual clients, and encourage referrals

The most recent CSNA and resulting strategic plan identified specific underserved populations that VRBS will focus on serving better including:

- The Deaf or hearing impaired
- Individuals with blindness and other vision impairments
- Rural and migrant communities as well as language minorities
- American Indians on reservations and in urban settings
- People with disabilities in institutional settings and
- Youth in foster placements

Various outreach procedures are being utilized to provide outreach to the aforementioned groups who have been underserved by VRBS including:

- Implementation of temporary Rehab Tech positions
- Creation of the Pre-ETS Bureau and hiring of 8 Pre-ETS Specialists
- Plans to hire a VISTA worker to assist with outreach to rural communities
- Moving a counselor position to Bozeman, MT, the fastest growing community in Montana currently

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- Collaboration with Montana Empowerment Center to reach more parents of students with disabilities
- Designated staff participating on National Veteran's Committee
- Previous and ongoing trainings on Diversity, Equity and Inclusion (DEI) topics on American Indian, LGBTQ+, Refugee, and Rural/Migrant populations - Supporting clients with intersecting disability and LGBTQ identities
- Collaboration between VRBS and Child and Family Services leadership to streamline referral processes and provide cross training on agency field work
- Collaboration between Blind and Low Vision Bureau with visual services programs on the reservations, the Diabetic Retinopathy Project, and other rural programs offering services to individuals with visual impairments
- Implementing counselor assignments to institutional settings to solicit applications for services
- Partnership with the Montana School for the Deaf and Blind to provide Pre-ETS and VRBS
- Participation in Cutting Fences podcast to spread awareness of VR services as they relate to serving individuals working in agricultural jobs

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).

The primary method of improving and expanding VR services to students with disabilities has been described elsewhere in this document. The main method has been contracting for Pre-ETS services with school districts. There also have been additional contracts with programs like Montana Youth Transitions, Montana Youth Leadership Forum, and Moving On as well as steps taken to enhance Pre-ETS collaboration with the tribal VR programs located in Montana. In addition, VRBS counselors have been encouraged to take applications with students with disabilities at a younger age and provide IPE services that are focused on vocational and career exploration rather than a specific vocational goal.

Recently, VRBS has begun working more closely with the Life Scholars program housed at Montana State University – Bozeman (MSU). Life Scholars at MSU is a 3-year, fully inclusive, non-degree certificate program for students with intellectual and developmental disabilities with the intent of helping students to gain knowledge in their chosen career path, develop friendships, explore careers through work and internships and obtain meaningful, competitive employment upon graduation. VRBS staff have been referring people to the Life Scholars program and continue to work on building more options for post-secondary education opportunities for individuals with intellectual disabilities.

VRBS also plans to collaborate more in the coming years with another program, Mentoring, Organization, and Social Support for Autism/All Inclusion on Campus (MOSSAIC), housed at University of Montana (UM), providing post-secondary

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opportunities to individuals with Autism and is exploring opportunities with University of Montana Western to develop a program providing Pre-ETS students and youth in those communities.

Finally, VRBS has expanded opportunities for students in rural areas to participate in Pre-ETS via a subscription to Virtual Job Shadow and is coordinating with Montana Empowerment Center through joint trainings to reach more parents of youth with disabilities.

#### 5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

Draft CRP manual developing continue to look at creative ways to build the provider network to meet the needs of people with disabilities. Monthly All Provider call, CE contracts, consider IPS contracts, looking at training options, LT goal for CRP website. VRBS continually assesses the need to establish, develop and improve community rehabilitation programs through town hall meetings, annual stakeholder meetings with CRPs, monthly all provider calls between CRPs and VRBS leadership, and ongoing informal communication. The need areas being addressed at this time include:

- Developing a CRP Manual to help clarify service descriptions as well as referral and billing processes and provide consistent information to all VRBS staff and all CRPs related to the roles and responsibilities of each
- Exploring options to improve training for CRPs and staff members of those CRPs
- Expanding services to rural and remote areas by the continued certification of private providers who meet VRBS qualification levels for job placement and job coaching services
- Pursuing options to improve services to individual with severe and persistent mental illness through expansion of mental health providers as CRP's as well as working towards contracting with providers who have the training necessary to provide Individualized Placement and Support (IPS) services.
- Implementing Customized Employment (CE) specific contracts with providers and expanding CE services by continuing to host annual Gateway Trainings in Discovery and Customized Job Development facilitated by Marc Gold & Associates
- Commencing a monthly CE Community of Practice (CoP) call where CRPs providing CE services can collaborate, share information, and learn and grow in the quality of their services together

#### 6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

Many of the strategies developed to meet the goals established by the comprehensive needs assessments are aimed at improving the long-range outcomes of persons exiting VR. Those strategies are detailed below in the section on activities to achieve goals and objectives.

Also, VRBS and the SRC will continue to monitor the performance outcomes throughout the year to assure compliance in meeting the required indicators.

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### 7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

As a core partner, VRBS will be aligned with the workforce system through:

- Representation on the state and local boards.
- Collaborative case management and co-enrollment when needed by the services from more than one system partner. Partners will make referrals to initiate co-enrollment if/when the consumer could benefit from the services of another partner program, if the consumer agrees, and/or if the consumer so requests. Referrals will be made on an individual consumer by-consumer basis, and not as a blanket referral throughout the workforce system.
- Co-enrollment occurs when consumers are actively participating in more than one workforce program.
- Collaboration with other core partners on targeted outreach activities.
- Enhanced consumer referrals among core partners.
- Participation in evaluation and continuous improvement strategies.
- Specific strategies to strengthen communications among core partners.
- Collaboration among core partners for business outreach activities.

VRBS is also pursuing avenues to establish Montana as an Employment First state.

### 8. How the agency's strategies will be used to: A. achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

VRBS leadership regularly discusses the comprehensive needs assessment and strategic plan with representatives of the SRC during quarterly SRC meetings. Information gathered from staff, public hearings, focus forums, consumer satisfaction surveys, state and national sources (CSAVR, RSA policy changes, legislative activities, umbrella agency activities), and other surveys is used to inform VRBS' strategic work plan and to prepare for biannual legislative sessions. VRBS leadership, in collaboration with various stakeholders including Disability Rights Montana, Centers for Independent Living, WIOA partners, Developmental Disabilities, State Rehabilitation Council, Community Rehabilitation Providers and others, developed the goals, objectives, and strategies outlined here.

For the strategic plan covering FFY 2020 through FFY2024, the format of strategies was changed. Five goals with supporting objectives and strategies specific to meeting each objective were selected during a virtual, comprehensive planning session held in May 2020.

### VRBS GOALS, OBJECTIVES, AND STRATEGIES

Montana VRBS's work is organized into five goals with supporting objectives.

Access and Quality	Youth Engagement	Equity	Coordination	Organizational Sustainability
Montanans with disabilities	Montana youth with disabilities	All people with disabilities are engaged	Montana's workforce system is coordinated	VRBS is a stable,

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can access high-quality competitive, integrated employment.	are effectively engaged in vocational exploration and work readiness training.	and valued for their abilities and contributions to our workforce, with extra emphasis on reaching underserved and unserved populations.	to effectively support people with disabilities and their employers.	sustainable organization.
<p>Increase the number of clients served by VRBS.</p> <p>Increase the percentage of VRBS clients employed, retained, and promoted in competitive, integrated jobs.</p> <p>Improve the quality of VRBS services.</p> <p>Increase the percentage of clients meeting and exceeding WIOA performance indicators.</p>	<p>Increase participation of students (14-21) with disabilities engaged in high quality pre-employment transition services (Pre-ETS).</p>	<p>Increase resources for people who are deaf or hearing impaired.</p> <p>Increase blind and low vision supports.</p> <p>Increase resources and access to rural and migrant communities as well as language minorities.</p> <p>Increase collaboration with 121 programs and resources to American Indians on reservations and in urban settings.</p> <p>Increase support for people with disabilities in</p>	<p>Increase community awareness and understanding of VRBS.</p> <p>Increase coordination with partner organizations.</p> <p>Enhance coordination with businesses/employers.</p> <p>Enhance eligibility and navigation processes for clients.</p>	<p>Increase fiscal stability.</p> <p>Increase staff professional development.</p> <p>Increase staff engagement and satisfaction.</p>

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		institutional settings.  Increase support for youth in foster placements.		
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### GOAL 1: ACCESS AND QUALITY. MONTANANS WITH DISABILITIES CAN ACCESS HIGH-QUALITY COMPETITIVE, INTEGRATED EMPLOYMENT.

VRBS is dedicated to supporting people with disabilities to achieve and maintain quality employment outcomes.

Objectives	Strategies
1.1 Increase the number of clients served by VRBS.	1.1.1 Reduce the waiting list and order of selection. 1.1.2 Improve community outreach and encourage more people to apply for VRBS services.
1.2 Increase the percentage of VRBS clients employed, retained, and promoted in competitive, integrated jobs.	1.2.1 Continue to move people out of shelter and group placements into competitive, integrated employment. 1.2.2 Eliminate sub-minimum wage jobs. 1.2.3 Increase access to customized employment opportunities. 1.2.4 Increase access to self-employment opportunities. 1.2.5 Provide higher education, trade school, apprenticeship, and certificate program opportunities to assist with sustaining and/or advancing people with disabilities. 1.2.6 Implement mechanisms for VRBS Counselors and Community Rehabilitation Providers (CRPs) to be more aware of the economy and labor market projections. 1.2.7 Provide Benefits Counseling to clarify the impact of working on state and federal benefits.
1.3 Improve the quality of VRBS services.	1.3.1 Provide high quality, holistic, long-term, relationship-based counseling services. 1.3.2 Integrate counselors with the internal team structure of subject matter experts.
1.4 Increase the percentage of clients meeting and exceeding WIOA performance indicators.	1.4.1 Use measurable skill gains to increase quality of placements and outcomes. 1.4.2 Train counselors on measurable skill gains and regularly monitor their accuracy.

### GOAL 2: YOUTH ENGAGEMENT. MONTANA YOUTH WITH DISABILITIES ARE EFFECTIVELY ENGAGED IN VOCATIONAL EXPLORATION AND WORK READINESS TRAINING.

VRBS is working to enhance its Pre-Employment and Transition Services (Pre-ETS) programming to shift the culture around disability and work at a younger age –

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changing individual and family expectations and helping young people to begin work earlier.

Objectives	Strategies
2.1 Increase participation of students (14-21) with disabilities engaged in high quality Pre-ETS.	2.1.1 Build capacity in Pre-ETS programs to reach eligible students with disabilities statewide. 2.1.2 Expand outreach efforts to qualified students, their families, and schools. 2.1.3 Improve application process to enroll students in Pre-ETS services. 2.1.4 Enhance collaboration and relationships between VR Counselors, Pre-ETS specialists, and students with disabilities. 2.1.5 Improve outcomes for students with disabilities as they transition out of Pre-ETS.

**GOAL 3: EQUITY. ALL PEOPLE WITH DISABILITIES ARE ENGAGED AND VALUED FOR THEIR ABILITIES AND CONTRIBUTIONS TO OUR WORKFORCE, WITH EXTRA EMPHASIS ON REACHING UNDERSERVED AND UNSERVED POPULATIONS.**

VRBS works to better meet the needs of unserved, underserved, and hard to serve people with disabilities throughout Montana.

Objectives	Strategies
3.1 Increase resources for people who are deaf or hearing impaired.	3.1.1 Contract with additional qualified interpreters. 3.1.2 Work to collaboratively start training programs for sign language interpreters. 3.1.3 Enhance access to assistive technology.
3.2 Increase blind and low vision supports.	3.2.1 Partner with doctors across the state to share resources and improve information access for the newly blind. 3.2.2 Enhance access to assistive technology.
3.3 Increase resources and access to rural and migrant communities as well as language minorities.	3.3.1 Analyze and modify staffing to ensure highly trained, specialized staff are effectively supporting rural, migrant, and language minorities. 3.3.2 Conduct outreach to organizations working with people in language minorities in Montana. 3.3.3 Improve outreach to rural communities. 3.3.4 Enhance strategic partnerships to increase awareness of VRBS as an option for migrant and refugee workers.
3.4 Increase collaboration with 121 programs and resources to	3.4.1 Increase outreach and communication with tribal partners, including 121 programs, health and human services providers, and high schools. 3.4.2 Partner with tribal colleges.



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Objectives	Strategies
American Indians on reservations and in urban settings.	3.4.3 Build relationships with tribal businesses.
3.5 Increase support for people with disabilities in institutional settings.	3.5.1 Enhance outreach and communication with institutions to increase awareness of and engagement with VRBS services.
3.6 Increase support for youth in foster placements.	3.6.1 Actively work with Child and Family Services to identify and engage with youth who could benefit from VRBS. 3.6.2 Enhance partnerships with schools, programs, and professionals serving homeless and at-risk youth.

### GOAL 4: COORDINATION. MONTANA'S WORKFORCE SYSTEM IS COORDINATED TO EFFECTIVELY SUPPORT PEOPLE WITH DISABILITIES AND THEIR EMPLOYERS.

VRBS works to support a cohesive approach to service delivery, inclusive of all partners. Having stronger connections with other agencies in our communities makes a difference in client employment outcomes and improved community integration.

Objectives	Strategies
4.1 Increase coordination with partner organizations.	4.1.1 Increase community awareness and understanding of VRBS. 4.1.2 Develop and implement a partner engagement plan, inclusive of Job Services, SRC, tribal vocational rehabilitation programs, CRPs, Developmental Disabilities Program, Adult Education, community block grant programs, Temporary Assistance for Needy Families (TANF), and others. 4.1.3 Increase coordination with Local Transportation Advisory Committees, Montana Transit Association, and other transportation stakeholders. 4.1.4 Develop a community performance appraisal tool and baseline measures for co-enrolled participants.
4.2 Enhance coordination with businesses/employers.	4.2.1 Increase awareness of VRBS with businesses and analyze options for improved information sharing. 4.2.2 Coordinate business relationship management with partner organizations. 4.2.3 Provide increased Windmills training to employers.

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Objectives	Strategies
4.3 Enhance eligibility and navigation processes for clients.	4.2.4 Increase business representation on the SRC. 4.3.1 Analyze options for a common intake process. 4.3.2 Analyze options for tools and methods to share client information.

### GOAL 5: ORGANIZATIONAL SUSTAINABILITY. VRBS IS A STABLE, SUSTAINABLE ORGANIZATION

VRBS needs to sustain a fiscally stable organization to do our work well, to best support Montanans. Our staff is the foundation for our organization; we are committed to supporting an effective and engaged staff to fulfill our mission.

Objectives	Strategies
5.1 Increase fiscal stability.	5.1.1 Improve Ticket to Work milestone payments collection process. 5.1.2 Put internal controls in place for financial monitoring.
5.2 Increase staff professional development.	5.2.1 Provide earlier Foundations training. 5.2.2 Develop and implement approaches to keep up to date on changes. 5.2.3 Provide ongoing, continuing education for staff. 5.2.4 Develop system to track staff professional development. 5.2.5 Conduct performance-based evaluations to support high quality work. 5.2.6 Enhance CRP training.
5.3 Increase staff engagement and satisfaction.	5.3.1 Celebrate staff and team successes. 5.3.2 Monitor workloads and determine need for work redistribution. 5.3.3 Ensure staff have updated, adequate tools. 5.3.4 Continually evaluate staff training needs and desires and develop training and career paths to support staff. 5.3.5 Continually evaluate employee engagement and make management decisions based on evaluations.

### B. Support innovation and expansion activities; and

All of the strategies outlined in o.8.A. support innovation and expansion activities to expand and improve the provision of vocational rehabilitation services to individuals with disabilities, particularly individuals with the most significant disabilities, including transition services for students and youth with disabilities and pre-employment transition services for students with disabilities.

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The State Rehabilitation Council (SRC) and its resource plan are conducted using innovation and expansion funds.

### 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.

Extensive efforts are underway to increase outreach to rural areas especially reservations and other tribal communities. Activities include:

- Addition of a counselor to the Havre office which services a very expansive rural area in Montana, the Hi Line.
- Creation of the Pre-ETS Bureau and hiring of Pre-ETS Specialists to cover all schools in all counties of Montana including schools on the reservations
- BLV Bureau serving all counties and all reservations in Montana
- Development of a relationship with key representatives who work on disability and/or workforce issues within the recently nationally recognized Little Shell Tribe in Montana
- Kicking off Disability Equity and Inclusion (DEI) training on various topics related to LGBTQ+, refugee, American Indian, and rural/migrant worker populations
- Participation in CSAVR DEI professional networking groups tasked with developing a resource tool kit comprised of books, movies, podcasts, etc. focusing on race and inclusion topics for state VR counselors

Obviously COVID-19 also posed a significant barrier to serving individuals with disabilities in Montana over the last two years and continues to be a barrier as we move into 2022 calendar year. VRBS overcame the barriers imposed by COVID by offering accessible clear masks to providers, clients, staff, and partners, providing teleconferencing options and technical assistance with accessing those options, implementing protective equipment such as plexiglass dividers in the local offices, offering socially distanced meetings in off-site locations while state offices were closed to the public, and implemented processes and procedures to electronically sign documents such as Individualized Plans for Employment (IPEs) in an effort to mitigate delays in services.

### P. Evaluation and Reports of Progress: VR and Supported Employment Goals

Describe:

1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:
  - A. Identify the strategies that contributed to the achievement of the goals.

**Goal 1: Access and Quality. Montanans with disabilities can access high-quality competitive, integrated employment.**

VRBS is dedicated to supporting people with disabilities to achieve and maintain quality employment outcomes.

## STATE OF MONTANA WIOA COMBINED STATE PLAN

Objectives	Strategies	Progress Update
1.1 Increase the number of clients served by VRBS.	<p>1.1.1 Reduce the waiting list and order of selection.</p> <p>1.1.2 Improve community outreach and encourage more people to apply for VRBS services.</p>	<ul style="list-style-type: none"> <li>- June 1, 2021 VRBS fully opened Category 1. As such, individuals determined eligible for VRBS services in Category 1 move directly into plan development and application numbers and are increasing as a result.</li> <li>- Bureau Chief of Field Services for VRBS is working to establish liaisons in each of the local VR offices with community mental health, TBI groups, and refugee agencies to improve collaboration and increase awareness of and applications for VRBS.</li> <li>- VRBS leadership has tasked all nine VRBS field offices with meeting their local foster care and veterans' programs and providing training to their staff on VRBS during the 2022 calendar year as well as at least three other programs of their choosing located in their local service area.</li> </ul>
1.2 Increase the percentage of VRBS clients employed, retained, and promoted in competitive, integrated jobs.	<p>1.2.1 Continue to move people out of shelter and group placements into competitive, integrated employment.</p> <p>1.2.2 Eliminate sub-minimum wage jobs.</p> <p>1.2.3 Increase access to customized employment opportunities.</p> <p>1.2.4 Increase access to self-employment opportunities.</p> <p>1.2.5 Provide higher education, trade school, apprenticeship, and certificate program opportunities to assist with sustaining and/or advancing people with disabilities.</p> <p>1.2.6 Implement mechanisms for VRBS Counselors and Community Rehabilitation Providers (CRPs) to be more aware of the economy and labor market projections.</p>	<ul style="list-style-type: none"> <li>- Four vocational rehabilitation counselors completed training through Social Security Administration (SSA) to become Community Partner Work Incentives Counselors (CPWICs). In early January 2022, an in-house referral procedure was developed and published. The first referrals for benefits counseling have been received and our in-house CPWICs having begun providing individualized, work incentive counseling services these VRBS participants.</li> <li>- The Rural Institute at University of Montana presented at a monthly All Staff meeting in September 2021 on Self Employment topics and completed a four-part extensive</li> </ul>

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Objectives	Strategies	Progress Update
	1.2.7 Provide Benefits Counseling to clarify the impact of working on state and federal benefits.	<p>training on the VR Self Employment Guide to all VRBS staff in January 2022.</p> <ul style="list-style-type: none"> <li>- Business Services Specialist is tracking all cases with Self-Employment goals on their IPEs and tracking all client cases where business plans are being worked on through advanced reporting available in the new case management system, Madison.</li> <li>- Members of the VRBS Self-Employment team are strongly encouraged to participate in webinars and trainings facilitated by the National Center on Self-Employment.</li> <li>- Montana Department of Labor and Industry Lead Economist presented at an All Provider call comprised of statewide CRPs in September 2021.</li> <li>- Multiple trainings on Customized Employment (CE) topics were hosted by VRBS and facilitated by Marc Gold &amp; Associates (MG&amp;A) for CE Providers and VRBS staff in November and December 2021</li> <li>- Gateway Trainings for providers interested in pursuing certification in Discovery and CJD were hosted by VRBS and facilitated by Marc Gold and Associates during the Spring of 2020 and 2021 and VRBS leadership are planning on host additional Gateway Trainings in 2022.</li> <li>- In 2021, the first CE contracts were offered to providers with certified staff or staff pursuing certification in CE service delivery, either Discovery or Customized Job Development (CJD).</li> <li>- For calendar year 2022, 3 new contracts for CE services were</li> </ul>

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Objectives	Strategies	Progress Update
		<p>developed with providers in various parts of the state: Aspen Adult Services (Helena), Counterpoint (Livingston), and Montana Employment Consultants (Billings).</p> <ul style="list-style-type: none"> <li>- A statewide goal called an OGSM (Objective, Goal, Strategy, Measure) was developed in collaboration with the Director of Montana's Department of Public Health and Human Services (DPHHS) to provide Career Counseling and Information and Referral (CCIR) services to 75% or more of the individuals currently working in facilities and on crews.</li> <li>- Montana Department of Labor and Industry Apprenticeship Diversity and Equity Officer presented to the Business Services Team in January 2022 and Business Services Specialist will be working closely with her to expand apprenticeship opportunities for VRBS clients.</li> </ul>
1.3 Improve the quality of VRBS services.	<p>1.3.1 Provide high quality, holistic, long-term, relationship-based counseling services.</p> <p>1.3.2 Integrate counselors with the internal team structure of subject matter experts.</p>	<ul style="list-style-type: none"> <li>- All VRBS Counselors and support staff are required to participate in one of several available teams. Teams include: Assistive Technology (AT) Team, Customized Employment (CE) Team, Quality Assurance (QA) Team, Youth Services Team, Business Services Team, Self-Employment Team, Support Staff 101, and Deaf &amp; Hard of Hearing Team.</li> <li>- VRBS' AT Team meets monthly and sends out a monthly newsletter on topics relevant to VR Counselors, including how to better incorporate AT into the VR process.</li> <li>- AT Team also completed and published an AT Assessment tool for VR Counselors to use with</li> </ul>

## STATE OF MONTANA WIOA COMBINED STATE PLAN

Objectives	Strategies	Progress Update
		<p>clients and determine benefits of AT for the individual client.</p> <ul style="list-style-type: none"> <li>- MonTECH presented to our Community Rehabilitation Provider network in August 2021 on AT available to assist with on-the-job supports and to all VRBS staff on Montana Assistive Technology Loan Program in January 2022.</li> <li>- Team leaders have joined other teams to assist in information sharing among the various Teams and all Pre-ETS staff have a subject matter expert designation in one of the following areas: Blind &amp; Low Vision, Deaf and Hard of Hearing, foster care youth, mental health, and addictions.</li> <li>- Designated VRBS staff person participating on National Veteran's Committee through CSAVR.</li> <li>- Business Services Specialist worked extensively with other States and Marc Gold and Associates (MG&amp;A) to develop a nationally recognized fidelity scale for CE services that has been added to the CE contracts for 2022.</li> </ul>
1.4 Increase the percentage of clients meeting and exceeding WIOA performance indicators.	<p>1.4.1 Use measurable skill gains to increase quality of placements and outcomes.</p> <p>1.4.2 Train counselors on measurable skill gains and regularly monitor their accuracy.</p>	<ul style="list-style-type: none"> <li>- VRBS wrote and published a Measurable Skills Gain (MSG) procedure.</li> <li>- Program Support and Operations Bureau Chief working with programmers for the new case management system, Madison, to develop an MSG Report to track and measure skills gains per counselor as well as additional reports on other performance measures.</li> <li>- Training on MSGs has been provided to VRBS staff on several occasions including at Go Live with</li> </ul>

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Objectives	Strategies	Progress Update
		Madison (June 28-July 2, 2021) and again on September 9, 2021

**Goal 2: Youth Engagement. Montana youth with disabilities are effectively engaged in vocational exploration and work readiness training.**

VRBS is working to enhance its Pre-Employment and Transition Services (Pre-ETS) programming to shift the culture around disability and work at a younger age – changing individual and family expectations and helping young people to begin work earlier.

Objectives	Strategies	Progress Update
2.2 Increase participation of students (14-21) with disabilities engaged in high quality Pre-ETS.	<p>2.2.1 Build capacity in Pre-ETS programs to reach eligible students with disabilities statewide.</p> <p>2.2.2 Expand outreach efforts to qualified students, their families, and schools.</p> <p>2.2.3 Improve application process to enroll students in Pre-ETS services.</p> <p>2.2.4 Enhance collaboration and relationships between VR Counselors, Pre-ETS specialists, and students with disabilities.</p> <p>2.2.5 Improve outcomes for students with disabilities as they transition out of Pre-ETS.</p>	<ul style="list-style-type: none"> <li>- Pre-ETS Specialists in partnership with the Montana Center for Inclusive Education developed outcome surveys for Pre-ETS clients to rate their experiences with Pre-ETS</li> <li>- In late 2021, Pre-ETS Specialists were assigned to develop Individualized Plans for Employment and manage cases for students while they remain in high school with processes implemented to transfer cases to general VR Counselors following client graduation.</li> <li>- Pre-ETS Bureau created an improved, more user-friendly student request form for entering into school based Pre-ETS services and began offering DocuSign as an option for completing the forms</li> <li>- Pre-ETS Specialists recently tasked with reaching out to all Home School Groups in their respective coverage areas to improve</li> </ul>



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Objectives	Strategies	Progress Update
		<p>participation of home-schooled youth in Pre-ETS</p> <ul style="list-style-type: none"> <li>- Pre-ETS has presented to Office of Public Instruction (OPI) Special Education staff, Deaf/Blind Project staff, MT Empowerment Center staff, Hands and Voices program, and at 2021 MYT Conference to spread awareness about and encourage participation in Pre-ETS</li> <li>- Pre-ETS received interest in new school contracts in 2021 from 5 schools that have not previously contracted to provide Pre-ETS and is pursuing contracts with each</li> <li>- Pre-ETS continues to contract with Montana Youth Leadership Forum (MYLF) and Movin' On at Montana State University-Billings and University of Montana in Missoula all of which provide Pre-ETS services to groups of youth.</li> <li>- The Pre-ETS Bureau filled a long vacant Havre Pre-ETS Specialist position who, since hired, has traveled the vast, rural northeastern section of Montana to meet with several schools and re-energize interest in Pre-ETS</li> </ul>

**Goal 3: Equity. All people with disabilities are engaged and valued for their abilities and contributions to our workforce, with extra emphasis on reaching underserved and unserved populations.**

VRBS works to better meet the needs of unserved, underserved, and hard to serve people with disabilities throughout Montana.

Objectives	Strategies	Progress Update
3.7 Increase resources for people who are deaf or hearing impaired.	<p>3.7.1 Contract with additional qualified interpreters.</p> <p>3.7.2 Work to collaboratively start training programs for sign language interpreters.</p>	<ul style="list-style-type: none"> <li>- Deaf Services Program Manager is actively working with Montana's university system and the Montana School for the Deaf and Blind (MSDB) on starting a sign</li> </ul>

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Objectives	Strategies	Progress Update
	3.7.3 Enhance access to assistive technology.	<p>language interpreter training program in the state.</p> <ul style="list-style-type: none"> <li>- Deaf Services Program Manager is testing non-physical interpreter options for VRBS clients particularly during COVID and for instances when live interpreters may not be available</li> </ul>
3.8 Increase blind and low vision supports.	<p>3.8.1 Partner with doctors across the state to share resources and improve information access for the newly blind.</p> <p>3.8.2 Enhance access to assistive technology.</p>	<ul style="list-style-type: none"> <li>- Blind and Low Vision (BLV) Bureau are actively coordinating with Diabetic Retinopathy Project to identify people at earlier stages of vision loss to apply for VR services.</li> <li>- BLV Bureau is coordinating with the Diabetic Retinopathy Project to receive specialized training for BLV staff.</li> <li>- BLV staff outreached to Northern Montana Vision Center in an attempt to inform NMVC about BLV services and solicit applications for BLV programs.</li> <li>- Butte BLV staff who cover the Bozeman Montana area have begun building a better working relationship with Bozeman Low Vision Center in hopes of improving services to BLV clients together.</li> </ul>

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Objectives	Strategies	Progress Update
3.9 Increase resources and access to rural and migrant communities as well as language minorities.	<p>3.9.1 Analyze and modify staffing to ensure highly trained, specialized staff are effectively supporting rural, migrant, and language minorities.</p> <p>3.9.2 Conduct outreach to organizations working with people in language minorities in Montana.</p> <p>3.9.3 Improve outreach to rural communities.</p> <p>3.9.4 Enhance strategic partnerships to increase awareness of VRBS as an option for migrant and refugee workers.</p>	<ul style="list-style-type: none"> <li>- Montana's Rural Employment Opportunities (REO) program presented on a Disability, Equity, and Inclusion panel at a VRBS All Staff training in May 2021.</li> <li>- Four VR Counselors attended the National AgrAbility Conference in the fall of 2021 held in Billings, MT</li> <li>- Spanish versions of various VRBS forms have been created including, the Pre-ETS student request form, VRBS application materials, and resource list given to clients on the waiting list for services in the Great Falls area.</li> <li>- Quality Assurance Officer began advertising VRBS job postings on national site targeting individuals exiting rehabilitation training programs called Handshake to attract more people and people with specializations to VRBS</li> <li>- Several new Pre-ETS contracts were established in 2021 with rural (and reservation) schools including, Troy, Sidney, Scobey, Roundup, Ronan, Poplar, Plentywood, Miles City, Manhattan, Lockwood, Libby, Harlowton, Geyser, Eureka, Dawson, Darby, Culbertson, Columbia Falls, Choteau, Charlo, Browning, Big Fork, Big Sandy, Bainville, and Alberton.</li> </ul>
3.1 Increase collaboration with 121 programs and resources to American Indians on reservations	<p>3.1.1 Increase outreach and communication with tribal partners, including 121 programs, health and human services providers, and high schools.</p> <p>3.1.2 Partner with tribal colleges.</p> <p>3.1.3 Build relationships with tribal businesses.</p>	<ul style="list-style-type: none"> <li>- VRBS Program Manager began working intensively on eligibility and other VR basics with new leadership of Confederated Salish and Kootenai Tribes (CSKT) 121 program</li> <li>- CSKT VR staff have been invited and plan to attend Foundations training facilitated by the VRBS Quality Assurance Officer</li> </ul>

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Objectives	Strategies	Progress Update
and in urban settings.		<p>tentatively scheduled for February 2022</p> <ul style="list-style-type: none"> <li>- Quality Assurance Officer worked with CSKT Administration to develop a “training assignment” hiring agreement to be able to hire their new Program Manager who does not yet have a Certified Rehabilitation Counselor designation. New CSKT Program Manager planning to apply for a position on the State Rehabilitation Council</li> <li>- VRBS Program Manager began updating Cooperative Agreements with all 121 programs in Montana and plans to have those completed by March 2022.</li> <li>- Havre Pre-ETS Specialist working to develop additional Pre-ETS contracts with schools on reservations in that area. Great Falls VRBS staff participated in Disability Awareness Day in Browning, MT located on the Blackfeet Manpower reservation alongside the Blackfeet Manpower 121 program in October 2021.</li> <li>- A caseload of dually enrolled Blackfeet Manpower 121 and VRBS clients was built in late 2021 and continues to grow.</li> <li>- Development of a relationship with key representatives who work on disability and/or workforce issues within the recently nationally recognized Little Shell Tribe in Montana</li> </ul>
3.2 Increase support for people with disabilities in institutional settings.	3.2.1 Enhance outreach and communication with institutions to increase awareness of and engagement with VRBS services.	<ul style="list-style-type: none"> <li>- A statewide goal called an OGSM (Objective, Goal, Strategy, Measure) was developed in collaboration with the Director of Montana’s Department of Public Health and Human Services</li> </ul>

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Objectives	Strategies	Progress Update
		(DPHHS) to provide high-quality Transition Services to youth in Psychiatric Residential Treatment Facilities and Therapeutic Group Homes.
3.3 Increase support for youth in foster placements.	<p>3.3.1 Actively work with Child and Family Services to identify and engage with youth who could benefit from VRBS.</p> <p>3.3.2 Enhance partnerships with schools, programs, and professionals serving homeless and at-risk youth.</p>	<ul style="list-style-type: none"> <li>- A statewide goal called an OGSM (Objective, Goal, Strategy, Measure) was developed in collaboration with the Director of Montana's Department of Public Health and Human Services (DPHHS) to provide high-quality Transition Services to youth in foster care and increase foster care youth receiving services from VRBS.</li> </ul>

**Goal 4: Coordination. Montana's Workforce system is coordinated to effectively support people with disabilities and their employers.**

VRBS works to support a cohesive approach to service delivery, inclusive of all partners. Having stronger connections with other agencies in our communities makes a difference in client employment outcomes and improved community integration.

Objectives	Strategies	Progress Update
4.1 Increase coordination with partner organizations.	<p>4.1.1 Increase community awareness and understanding of VRBS.</p> <p>4.1.2 Develop and implement a partner engagement plan, inclusive of Job Services, SRC, tribal vocational rehabilitation programs, CRPs, Developmental Disabilities Program, Adult Education, community block grant programs, Temporary Assistance for Needy Families (TANF), and others.</p> <p>4.1.3 Increase coordination with Local Transportation Advisory Committees, Montana Transit Association, and other transportation stakeholders.</p> <p>4.1.4 Develop a community performance appraisal tool and</p>	<ul style="list-style-type: none"> <li>- Disability Employment and Transitions Division hired a new transportation coordinator in October 2021.</li> <li>- VRBS and Developmental Disabilities Program (DDP) leadership developed and published a joint referral and billing procedure in July 2021.</li> <li>- VRBS and DDP leadership meet monthly to maintain a productive working relationship and improve collaboration to ensure ease of access to services for clients.</li> <li>- VRBS leadership began targeted collaboration with programs serving youth with mental illness, foster care and</li> </ul>

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Objectives	Strategies	Progress Update
	baseline measures for co-enrolled participants.	<p>homeless youth, and the Diabetic Retinopathy Project.</p> <ul style="list-style-type: none"> <li>- Ongoing partnerships with Montana's 121 programs</li> <li>- VRBS leadership met regularly with the Individualized Placement and Supports (IPS) programs in 2021 to improve collaboration and expand IPS offerings across the state. Meetings and collaboration will continue into 2022.</li> </ul>
4.2 Enhance coordination with businesses/employers.	<p>4.2.1 Increase awareness of VRBS with businesses and analyze options for improved information sharing.</p> <p>4.2.2 Coordinate business relationship management with partner organizations.</p> <p>4.2.3 Provide increased Windmills training to employers.</p> <p>4.2.4 Increase business representation on the SRC.</p>	<ul style="list-style-type: none"> <li>- State Rehabilitation Council has worked diligently in the last years to recruit business representatives to the council, successfully filling two seats with business owners located on opposite sides of the state: one from southeastern Montana and one from northwestern Montana.</li> <li>- The Business Services Specialist in collaboration with the Business Services Team published a procedure on Windmills Delivery in February 2021.</li> <li>- VRBS celebrated National Disability Employment Awareness Month in October 2021 by hosting a viewing of the Hearts of Glass documentary film followed by a panel discussion on the film and disability employment.</li> </ul>

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Objectives	Strategies	Progress Update
4.3 Enhance eligibility and navigation processes for clients.	<p>4.3.1 Analyze options for a common intake process.</p> <p>4.3.2 Analyze options for tools and methods to share client information.</p>	<ul style="list-style-type: none"> <li>- VRBS leadership is actively working on technical specifications for SARA a digital assistant to assist with client follow-up, data entry, and documentation to interface with VRBS' new case management system Madison.</li> <li>- State Verification Exchange System (SVES) was approved for Montana VRBS in 2021 and Program Support and Operations Bureau Chief is working on integrating SVES into Madison.</li> <li>- Quality Management Technical Assistance Center staff presented to all VRBS staff on eligibility and IPE development with emphasis on rapid engagement of clients into VR services.</li> </ul>

### **Goal 5: Organizational Sustainability. VRBS is a stable, sustainable organization.**

VRBS needs to sustain a fiscally stable organization to do our work well, to best support Montanans. Our staff is the foundation for our organization; we are committed to supporting an effective and engaged staff to fulfill our mission.

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Objectives	Strategies	Progress Update
5.1 Increase fiscal stability.	5.1.1 Improve Ticket to Work milestone payments collection process. 5.1.2 Put internal controls in place for financial monitoring.	<ul style="list-style-type: none"> <li>- VRBS Program manager published three Ticket to Work (TTW) procedures with associated internal controls in 2021.</li> <li>- All VRBS Staff participated in financial audit training facilitated by Montana's Legislative Audit Division in 2021.</li> <li>- VRBS has developed and actively works to maintain open communication and a responsive relationship with Business Financial Services Division (BFSD) in Montana.</li> <li>- Program Support and Operations Bureau established a mentoring relationship for VRBS' budget analysts with Montana's Public Health Program (Program 7).</li> <li>- Program Support and Operations Bureau Chief collaborated with BFSD staff to write RSA-17 procedures and associated internal controls.</li> <li>- Program Support and Operations Bureau Chief continues to work on writing procedures and associated internal controls on various fiscal and program tasks.</li> <li>- VRBS leadership participated in interactive training on Internal Controls facilitated by Quality Management Technical Assistance Center (QM TAC) staff.</li> <li>- VRBS has and will continue to utilize our fiscal liaison with Rehabilitation Services Administration.</li> </ul>



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Objectives	Strategies	Progress Update
5.2 Increase staff professional development.	5.2.1 Provide earlier Foundations training. 5.2.2 Develop and implement approaches to keep up to date on changes. 5.2.3 Provide ongoing, continuing education for staff. 5.2.4 Develop system to track staff professional development. 5.2.5 Conduct performance-based evaluations to support high quality work. 5.2.6 Enhance CRP training.	<ul style="list-style-type: none"> <li>- Quality Assurance Program Manager facilitated Foundations in July 2021 for all new VRBS staff.</li> <li>- Quality Management Technical Assistance Center staff presented to all VRBS staff on eligibility and IPE development with emphasis on rapid engagement of clients into VR services.</li> <li>- VRBS leadership actively participated in interactive Change Management training prior to Go Live with our new case management system Madison in 2021.</li> <li>- VRBS leadership actively participated in interactive leadership training facilitated by Fred MacFarland in 2021.</li> <li>- VRBS Program Manager coordinated mini-training sessions facilitated during monthly All Provider calls for CRPs in 2021 on topics including disability rights, labor market information, assistive technology, and IPS.</li> <li>- VRBS leadership completed an intensive group case review in Helena in August 2021.</li> <li>- Counselor Supervisors in the local VRBS offices complete monthly targeted case reviews for all counselors under their supervision.</li> <li>- All VRBS staff members who have supervisory positions completed Performance Appraisals in December 2020 and December 2021.</li> <li>- VRBS implemented procedures for submitting Acquisition Planning and Implementation (API) forms to align with State procurement rules for high dollar purchases.</li> </ul>

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Objectives	Strategies	Progress Update
5.3 Increase staff engagement and satisfaction.	5.3.1 Celebrate staff and team successes. 5.3.2 Monitor workloads and determine need for work redistribution. 5.3.3 Ensure staff have updated, adequate tools. 5.3.4 Continually evaluate staff training needs and desires and develop training and career paths to support staff. 5.3.5 Continually evaluate employee engagement and make management decisions based on evaluations.	<ul style="list-style-type: none"> <li>- A statewide goal called an OGSM (Objective, Goal, Strategy, Measure) was developed in collaboration with the Director of Montana's Department of Public Health and Human Services (DPHHS) to enhance employee engagement.</li> <li>- VRBS leadership plan to re-evaluate employee engagement in 2022 through survey previously used by VRBS.</li> <li>- VRBS leadership re-purposed an administrative support staff position into a VR Counselor position to improve services to clients in our highest volume office in Missoula.</li> <li>- VRBS leadership moved a position from the Butte VR office to the Bozeman VR office as Bozeman has the fastest growing population in Montana.</li> <li>- VRBS leadership are planning to repurpose and an administrative support staff position in Billings to a Pre-ETS Specialist position in Bozeman.</li> <li>- Pre-ETS Bureau was nimble in their hiring practices to effectively fill the Havre Pre-ETS Specialist position that was vacant for an extended period of time.</li> <li>- In late 2021, Pre-ETS Specialists were assigned to develop Individualized Plans for Employment (IPEs) and manage cases for students while they remain in high school with processes implemented to transfer cases to general VR Counselors following client graduation to partially alleviate growing case load sizes of VR Counselors.</li> <li>- VRBS was awarded American Rescue Plan Act (ARPA) funding in</li> </ul>

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Objectives	Strategies	Progress Update
		<p>2021 to temporarily hire 10 VR Technicians from January 1, 2022 through December 31, 2023. As of February 2022, 7 of the 10 positions have been filled.</p> <ul style="list-style-type: none"> <li>- Staff in the Miles City VR office have been assisting with overflow work from the other offices including support staff duties and VRC case work due to staff vacancies in other offices.</li> <li>- VRBS has celebrated staff in myriad of ways in 2020 and 2021 including, sharing client success stories in leadership meetings, awarding Amazon gift cards and other prizes to VRBS staff that participated in testing of Madison, working together to update VRBS mission, vision, and values, acknowledging Ticket to Work reimbursements via email to counselor and support staff responsible as well as leadership, and facilitating awards ceremonies to recognize VR Counselors case of the year.</li> <li>- Procedure team published and/or updated 14 procedures in 2020 and 25 procedures in 2021 with intention to continue to publish new procedures to be added to online procedure manual in the coming years.</li> </ul>

### B. Describe the factors that impeded the achievement of the goals and priorities

COVID-19 posed the most significant barrier to serving individuals with disabilities in Montana and meeting aforementioned goals over the last two years. Despite the worldwide pandemic, VRBS was still able to make progress towards goals and adapt to providing high-quality rehabilitation services virtually.

### 2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment

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Supplement for the most recent program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals.

VRBS continually assesses the need to establish, develop and improve community rehabilitation providers (CRPs) through town hall meetings, annual stakeholder meetings with CRPs, monthly all provider calls between CRPs and VRBS leadership, and ongoing informal communication. The need areas being addressed at this time include:

- Developing a CRP Manual to help clarify service descriptions as well as referral and billing processes and provide consistent information to all VRBS staff and all CRPs related to the roles and responsibilities of each
- Exploring options to improve training for CRPs and staff members of those CRPs
- Expanding services to rural and remote areas by the continued certification of private providers who meet VRBS qualification levels for job placement and job coaching services
- Pursuing options to improve services to individual with severe and persistent mental illness through expansion of mental health providers as CRP's as well as working towards contracting with providers who have the training necessary to provide Individualized Placement and Support (IPS) services.
- Implementing Customized Employment (CE) specific contracts with providers and expanding CE services by continuing to host annual Gateway Trainings in Discovery and Customized Job Development facilitated by Marc Gold & Associates
- Commencing a monthly CE Community of Practice (CoP) call where CRPs providing CE services can collaborate, share information, and learn and grow in the quality of their services together
- Collaborating with the Developmental Disabilities Program on an ongoing basis

B. Describe the factors that impeded the achievement of the goals and priorities

The primary factor that impeded success in priorities in 2020 and 2021 was COVID-19.

Additionally, the rural nature of Montana impedes success in the priorities mentioned above. Large areas with small populations make it difficult to develop supported employment resources.

3. The VR program's performance on the performance accountability indicators under section 116 of WIOA.

The following is PY2020 data for the performance accountability indicators taken from the WIOA Statewide and Local Performance Report for the VR program.

Program Year 2020 data is:

- Employment rate 2nd quarter after exit: 63.2%
- Employment rate 4th quarter after exit: 14.2%
- Median Wage 2nd qtr. after exit: \$3773.50

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- Credential Rate: 33%
- Measurable Skill Gains: 36.4%
- Effectiveness in Serving Employers: not available

Without any precedent for gauging the effectiveness of employer services, Montana will use employment retention for the Effectiveness in Serving Employers measure (retention of employment 4 quarters after program exit). This measure is being used by all the other partners involved with the Combined Plan and allows for comparison across programs. We will work with businesses seeking help with their hiring challenges by providing information and resources on sound hiring and retention practices and by educating them on the value of hiring populations previously not considered by Montana's businesses, including individuals with disabilities.

### 4. How the funds reserved for innovation and expansion (I&E) activities were utilized.

The State Rehabilitation Council (SRC) and its resource plan are conducted using innovation and expansion funds.

### Q. Quality, Scope, and Extent of Supported Employment Services 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.

Quality of Supported Employment Vocational Rehabilitation and Blind Services (VRBS) enrolls providers who will provide supported employment time services. The enrollment process requires that providers have met a set of standards described in administrative rules. This enrollment process ensures that the providers maintain the necessary education, skills, and degree of professional expertise to provide a level of service commensurate with VRBS work service standard. VRBS values its priority partners who have met the required standards. Supported employment providers enrolled through the developmental disability system or mental health system represent the majority of our providers. The Commission on Accreditation of Rehabilitation Facilities (CARF) and Rehabilitation Services Accreditation System (RSAS) are also utilized by providers. Other providers are individuals or organizations who have been enrolled to provide services for a limited number of consumers in a rural area where there are no established providers.

Quality of services is continually monitored by the VR counselors as well as by the Program Manager who conducts reviews of the CRPs supported employment services.

#### Scope of Services

The scope of services available may include one or more of the following services depending on the individual's needs:

- Supported Employment Services
- Extended Services

## STATE OF MONTANA

### WIOA COMBINED STATE PLAN

Extended support services are available through a variety of programs following closure of the VR case. These services are described previously in this document.

Extent of Supported Employment:

An individual shall be eligible to receive supported employment services using Title VI Part B funds for those:

1. for whom competitive integrated employment has not historically occurred, or
2. for whom competitive integrated employment has been interrupted or intermittent as a result of a significant disability, and
3. who, because of the nature and severity of their disabilities, has had supported employment identified as the appropriate employment service followed by long term supports after the VR case is closed

Cooperative Agreements:

When a goal requiring supported employment is identified in the IPE, a document (cooperative agreement) signed and dated by the extended service provider reflecting the commitment of extended service provisions will be placed in the file prior to closure. A similar commitment is obtained from the fund provider when appropriate.

#### 2. The timing of transition to extended services.

Funding Extended Support Services Prior to Closure:

VRBS provides time-limited services needed to support an individual in employment (with the exception of extended services for youth with the most significant disabilities between the ages of 14-24 for which the time limit is 48 months). VRBS can fund a maximum of 24 months of job coaching and follow-along services unless the Individualized Plan of Employment (IPE) indicates that more than 24 months of services are necessary for the individual to achieve job stability prior to transitioning to extended support services. Prior to the purchase of supported employment services, the need for services, the appropriate extended support services, funding, and the appropriate agency to provide the services are established and identified on the IPE. Supported employment services are available statewide.

#### Certifications

Name of designated State agency or designated State unit, as appropriate

**Disability Employment and Transitions Division**

Name of designated State agency

**Montana Department of Public Health and Human Services**

Full Name of Authorized Representative: **Chanda Hermanson**

Title of Authorized Representative: **Division Administrator**

**States must provide written and signed certifications that:**

1. The **designated State agency or designated State unit (as appropriate) listed above** is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act),

## STATE OF MONTANA WIOA COMBINED STATE PLAN

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as amended by WIOA\*, and its supplement under title VI of the Rehabilitation Act. \*\*  
**Yes**

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

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

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

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

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

7. The **Authorized Representative listed above** has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement; **Yes**

8. The **Authorized Representative listed above** has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; **Yes**

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

<a href="#">Footnotes</a>
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### Certification 1 Footnotes

## STATE OF MONTANA WIOA COMBINED STATE PLAN

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\* Public Law 113-128.

\*\* Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

### **Certification 2 Footnotes**

\* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

\*\* No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

\*\*\* Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

### **Certification 3 Footnotes**

\* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

\*\* Applicable regulations, in part, include the citations in \*\*\* under Certification 2 footnotes

<b>Additional Comments on the Certifications from the State</b>
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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.



## STATE OF MONTANA WIOA COMBINED STATE PLAN

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

<b>Certification Regarding Lobbying — Vocational Rehabilitation</b>
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Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

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

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

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

<b>Statement for Loan Guarantees and Loan Insurance</b>
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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

## STATE OF MONTANA WIOA COMBINED STATE PLAN

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

Applicant's Organization     **Disability Employment and Transitions Division**

Full Name of Authorized Representative:     **Chanda Hermanson**

Title of Authorized Representative:     **Administrator Disability and Transitions Division**

[SF LLL Form – Disclosure of Lobbying Activities](#) (only if applicable)  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable, please print, sign, and email to [MAT\\_OCTAE@ed.gov](mailto:MAT_OCTAE@ed.gov)

<b>Certification Regarding Lobbying — Supported Employment</b>
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Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

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

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

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

<b>Statement for Loan Guarantees and Loan Insurance</b>
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## STATE OF MONTANA WIOA COMBINED STATE PLAN

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

Applicant's Organization     **Disability Employment and Transitions Division**

Full Name of Authorized Representative:     **Chanda Hermanson**

Title of Authorized Representative:     **Administrator Disability Employment and Transitions Division**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>).

<b>Assurances</b>
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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:**

<b>1. Public Comment on Policies and Procedures:</b>
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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.

<b>2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement:</b>
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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.

## STATE OF MONTANA WIOA COMBINED STATE PLAN

### 3. Administration of the VR services portion of the Unified or Combined State Plan:

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

- a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.
- b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.

The designated State agency or designated State unit, as applicable

(B) has established a State Rehabilitation Council

- c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.
- d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).
- e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.

The designated State agency allows for the local administration of VR funds     **No**

- f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.

The designated State agency allows for the shared funding and administration of joint programs:     **No**

- g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan.     **No**

- h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.
- i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act .

## STATE OF MONTANA WIOA COMBINED STATE PLAN

- j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
- k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.
- l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities.
- m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act.
- 4. Administration of the Provision of VR Services:  
The designated State agency, or designated State unit, as appropriate, assures that it will:
  - a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act.
  - b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.
  - c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act?

Agency will provide the full range of services described above      **No due to Order of Selection**

- d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
- e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.
- f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act.
- g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the

## STATE OF MONTANA WIOA COMBINED STATE PLAN

	<p>State, in accordance with section 101(a)(13) of the Rehabilitation Act.</p> <p>h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act.</p> <p>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</p> <p>j. With respect to students with disabilities, the State,</p>
i. Has developed and will implement,	<p>Strategies to address the needs identified in the assessments; and</p> <p><u>A.B.</u> 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</p>
ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).	<p>5. Program Administration for the Supported Employment Title VI Supplement:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>6. Financial Administration of the Supported Employment Program:</p> <p>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</p>

## STATE OF MONTANA WIOA COMBINED STATE PLAN

provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act.

b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.

7. Provision of Supported Employment Services:

a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.

b. The designated State agency assures that:

iii. 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

iv. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.

Additional Comments on the Assurances from the State

### Vocational Rehabilitation Public Comment

The Vocational Rehabilitation section of the Combined WIOA State Plan has a separate public comment timeline and review through the State Rehabilitation Council. It is submitted to the governor for review as part of the annual Vocational Rehabilitation and Blind Services Report to the governor.

## 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, DW Program, Youth Program, WP Act Program, AEFLA Program, and the VR Program – and also submit relevant information for any of the 11 partner programs it includes in its Combined State Plan.



## STATE OF MONTANA WIOA COMBINED STATE PLAN

When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II and III of this document, where specified, as well as the program-specific requirements for that program.

The requirements that a State must address for any of the Combined State Plan partner programs it includes in its Combined State Plan are available in a separate supplemental document, *Supplement to the Workforce and Innovation Act (WIOA) Unified and Combined State Plan Requirements*. The Departments are not seeking comments on these program-specific requirements, which exist under separate OMB control numbers.

### 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

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## STATE OF MONTANA WIOA COMBINED STATE PLAN

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

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## STATE OF MONTANA WIOA COMBINED STATE PLAN

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.

<u>Performance Indicators</u>	<u>PY 2022 Expected Level</u>	<u>PY 2022 Negotiated Level</u>	<u>PY 2023 Expected Level</u>	<u>PY 2023 Negotiated Level</u>
<u>Employment (Second Quarter After Exit)</u>	57.9%	Baseline	57.9%	Baseline
<u>Employment (Fourth Quarter After Exit)</u>	45.5%	Baseline	45.5%	Baseline
<u>Median Earnings (Second Quarter After Exit)</u>	\$3529.21	Baseline	\$3529.21	Baseline
<u>Credential Attainment Rate</u>	38.9%	Baseline	38.9%	Baseline
<u>Measurable Skill Gains</u>	36.3%	n/a	36.3%	n/a
<u>Effectiveness in Serving Employers</u>	Not Applicable 1	Not Applicable 1	Not Applicable 1	Not Applicable 1

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## STATE OF MONTANA WIOA COMBINED STATE PLAN

### TRADE ADJUSTMENT ACT

The Trade Adjustment Act (TAA) program is a Federal program that offers a variety of benefits and services to workers whose employment has been adversely impacted by foreign trade. Through a number of benefits and services, the TAA program provides trade-affected workers with opportunities to obtain the support, resources, skills, and credentials they need to return to the workforce in a good job. These include employment and case management services, training, job search allowances, relocation allowances, reemployment and alternative TAA wage subsidies for older workers, and income support in the form of Trade Readjustment Allowances (TRA).

There are not program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Has the state incorporated TAA into the sections indicated above? **YES**

### TAA PROGRAM ASSURANCES

The TAA program is a Required Partner in the one-stop system, established under Section 121 of WIOA. However, to receive TAA program funds, States must adhere to the signed Governor-Secretary Agreement, in addition to the terms and conditions provided in the TAA Annual CFA and the UI Annual Funding Agreement, executed each fiscal year between the State and ETA.

The CFA, which is incorporated by reference into the Governor-Secretary agreement, explains program requirements, limitations on the use of funds, assurances and other important grant provisions that States must follow to receive TAA program funding for Training and Other Activities (which includes training, employment and case management services, and allowances for job search and relocation and State administration of these benefits and services).

At the beginning of each fiscal year, ETA provides each Cooperating State Agency (CSA) with the CFA for that year, which the CSA is required to execute and submit to ETA's Office of Grants Management. The UI Annual Funding Agreement is the mechanism for funding the State administration of TRA and older worker wage subsidies through the State agency that administers the UI laws for the State.

#### THE STATE PLAN MUST INCLUDE ASSURANCES THAT:

- (1) On an annual basis, the CSA will execute TAA CFAs and UI Funding Agreements for each fiscal year during the four-year State planning cycle.

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### JOBS FOR VETERANS STATE GRANTS

The Jobs for Veterans State Grants (JVSG) are mandatory, formula-based staffing grants provided by DOL to states. 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 (US DOL Veterans Employment & Training Service (VETS)-200 Series Reports quarterly (using four “rolling quarters”) on a Program Year basis (as with ETA-9002 Series). Currently, VETS JVSG operates on a five-year (FY 2015-2019), 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 DVOP specialists and 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.**

Veterans and eligible persons receive employment, training and job placement services at the Montana Job Service Centers like other Montana Job Service Center customers. However, veterans and eligible persons will receive priority of service over non-veterans when it comes to receiving employment, training, and job placement services.

All veterans, spouses, and caregivers who enter a Job Service Center that house a Disabled Veteran Outreach Program (DVOP) Specialist are screened for eligibility to determine if the veteran and other eligible persons qualify for DVOP services.

DVOPs work one on one with eligible veterans and eligible persons to provide training in job placement and employment skills to include, but not limited to, resume writing and review, interview concepts and skills, and searching for employment.

- (a) 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.**

DVOPs are charged with providing case management and individualized careers services to young veterans aged 18-24, eligible spouses, and veterans with Significant Barriers to Employment (SBEs) as outlined in Veterans Program Letter most current guidance, which include:

- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C § 4211(1) and (3); special disabled and disabled veterans are those 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
  - were discharged or released from active duty because of a service-connected disability;

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- A homeless person, 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;
- A recently separated service member, as defined in 38 U.S.C § 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months;
- An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;
- A veteran lacking a high school diploma or equivalent certificate; or
- A low-income individual (as defined by WIOA Section 3 (36)).

DVOPs provide a range of services including career planning and counseling, comprehensive assessments, individual employment plan development, short-term pre-vocational services, and other career services within the Montana Job Service Centers. These services include but are not limited to:

- Outreach to locate veterans in need of intensive services;
- Comprehensive Assessment, including a documented plan of service (IEP);
- Counseling and career/vocational guidance;
- Referral of veterans to supportive or remedial services;
- Promoting Vocational Rehab and WIOA services;
- Referral of veterans to job focused and outcome-driven training or certification;
- Job development;
- Development of VA funded Special Incentive and OJT;
- Review all open case files of current participants with an SBE in a priority category and perform case management duties; and
- Referral of veterans to employment opportunities.

**(c) The manner in which DVOP specialists and LVER staff are integrated into the State's employment service delivery system or one-stop delivery system partner network.**

Jobs for Veterans State Grant (JVSG) programs are administered by the Montana Department of Labor & Industry (DLI) and are co-located, fully integrated, and managed by the Montana Job Service Operations Bureau, which also serves as the state's One-Stop Operator. JVSG funds 6.5 FTE including:

- Disabled Veterans Outreach Specialists (DVOP);
- A Veteran Intensive Service Coordinator who also serves as the program manager; and
- A combined position that serves as a DVOP and Local Veterans Employment Representative (LVER).

Customers entering the Job Service Centers are screened for eligibility and referred to JVSG staff as appropriate. In most cases, JVSG clients are co-enrolled in Title I-B programs.

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Other one-stop partners are aware of the services available from a DVOP through outreach. Partners are invited to Community Management Team (CMT) meetings to learn about and directly see the services available.

**(d) The Incentive Award program implemented using the 1% grant allocation set aside for this purpose, as applicable.**

The Performance Incentive Award Program will be operated in accordance with VPL 02-07. The total amount of funds available for Performance Incentive Awards will total one percent of the total JVSG awarded to the state.

Eligible recipients of the JVSG Employee Performance Incentive Awards are as follows: Disabled Veterans' Outreach Program Specialists (DVOPs), Local Veterans Employment Representatives (LVERs) staff, and any other employee who provides services to veterans through employment service delivery programs. Recipients of Performance Incentive Awards can be individuals or a team (such as a local office).

The performance awards will be presented to deserving individuals and to teams during the last quarter of the Federal Fiscal Year. A detailed report of the Performance Award obligated funds will be provided with the fourth quarter report. These awards recognize eligible employees for excellence in the provision of services or for making demonstrable improvements in the provision of services to veterans through the American Job Center System. The award amount will be dependent on the number of nominations for both individual and team awards. All awards will be based on performance or activities that occurred during the program year for which the award is given. In accordance with VPL 02-07, incentive award funds will be obligated by September 30 and expended by December 31 of each FY.

**(e) The populations of veterans to be served, including any additional populations designated by the Secretary as eligible for services, and any additional populations specifically targeted by the SWA for services from the one-stop delivery system partners (e.g., Native American veterans, veterans in remote rural counties or parishes).**

Veterans are an important part of the Montana workforce, with over 50,000 veterans employed. Montana has a large population of veterans, but the labor force participation rate of Montana veterans is lower than the national average. Roughly 30% of Montanan's veterans have a disability, which contributes to lower-than-average labor force participation rates.

DVOPs are charged with providing case management and individualized careers services to young veterans aged 18-24, eligible spouses, and veterans with Significant Barriers to Employment (SBEs) as outlined in Veterans Program Letter (VPL) 03-14 and 04-14, which include:

- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C § 4211(1) and (3); special disabled and disabled veterans are those who:

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- 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,
- were discharged or released from active duty because of a service-connected disability;
- A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a) and (b)), as amended;
- A recently separated service member, as defined in 38 U.S.C § 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months;
- An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;
- A veteran lacking a high school diploma or equivalent certificate; or
- A low-income individual (as defined by WIOA Section 3 (36)).

<b>(f) How the State implements and monitors the administration of priority of service to covered persons.</b>
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All Montana service providers, including the Job Service Centers offer priority of service to all covered persons who access the workforce system. Covered persons are identified at point of entry to allow them to take full advantage of priority of service. Regardless of the service provider, or point of entry for a veteran, services and referrals are made to best meet their needs.

Customers entering a Job Service Center are queried in the customer reception area (point of entry) to ascertain covered person status. A customer that self-attests to be a veteran or spouse of an eligible veteran (covered person) are offered the opportunity to step to the front of the line and receive services before a non-covered customer. At that time, the covered person will be made aware of their entitlement to priority of service, employment and training services available and eligibility requirements for available employment and training services.

Montana Job Service Center staff conduct a screening for each veteran/eligible spouse at point of entry to a Job Service Center. Throughout the intake process, veterans who disclose or self-attest to meeting one or more of the criteria for DVOP services will be referred to a DVOP. If a DVOP is not available when a referral is necessary, the Veteran/Eligible Spouse may choose to be served on a priority basis by another staff member.

Veterans not meeting the criteria for DVOP services are to be referred to appropriate non-JVSG staff to receive core, intensive, and/or training services on a priority of service basis. Job Service will monitor priority of service to veterans/eligible persons to ensure that all staff follow the statutory and regulatory requirements regarding all Department of Labor programs. Priority of service will be monitored through analysis of data found in the Employment and Training Administration's Federal Reports, from observations annotated in the Manager's Quarterly Report on Services to Veterans and from reports completed by Job Service Systems Management Staff. These reports are

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reviewed by the State Veterans' Program Manager. Process improvement plans are recommended for those offices needing improvement.

- (g) How the State provides or intends to provide and measure, through both the DVOP and one-stop delivery system partner staff:**  
**(1) Job and job training individualized career services;**

Montana Department of Labor & Industry (DLI) and Jobs for Veterans State Grant (JVSG) supported staff are assigned to the local area workforce centers to most effectively assure receipt of all employment and training services and the prompt referral to appropriately needed job and job training individualized career services for veteran customers and their eligible spouses. The placement of the JVSG supported staff is determined by DLI based on veteran population in accordance with the Montana JVSG State plan. Within the local workforce centers the Disabled Veteran Outreach Program specialists are co-located and aligned with the WIOA staff. The reasoning behind this decision is to promote; (i) program co-enrollments, (ii) cross training between the WIOA and DVOP case managers and case management practices and (iii) promote the appearance of a seamless application process to veterans who apply for training in one or both programs. For training enrollment, the DVOP specialists follow the workforce center's enrollment protocol and work very closely with the WIOA case managers during the co-enrollment process. The tools in which we measure the services provided include but not limited to:

- Interviewing of Job Service Center staff
- Monitoring MWorks
- Review of program files and documentation
- Customer surveys
- Site visits
- Accompanying DVET during federal audits
- Quarterly Managers Report
- Regional Director meetings

**(2) Employment placement services; and**

Local Business Services Representatives work with employers to expand opportunities and build capacity for all veterans utilizing the workforce system. In addition, Business Services Representatives work closely with Disabled Veteran Outreach Program (DVOP) specialists, WIOA case managers and Wagner-Peyser staff to ensure that veterans deemed job ready are connected to employment opportunities through their own personal network of businesses and of those located within the state's labor exchange, MontanaWorks.gov. By doing so this provides the DVOP the opportunity to work with the Business Service Representatives and to participate in the planning and implementation of any employer focused initiative in which all veterans and eligible spouses may benefit. The DVOP and the Business Services Representative meet on a regular basis to discuss opportunities to help the veterans and eligible family members to become employed. The tools in which we measure the services provided include but not limited to:

- Interviewing of Job Service Center staff
- Monitoring MWorks



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- Review of program files and documentation
- Customer surveys
- Site visits
- Accompanying DVET during federal audits
- Quarterly Managers Report
- Regional Director meetings

### **(3) Job-driven training and subsequent placement service program for eligible veterans and eligible persons**

The JVSG and workforce center staff participates in state and local area training sessions and initiatives centered around sectors and career pathways. JVSG and workforce center staff utilize local labor market information as a tool when eligible veterans and persons are making job-driven training decisions. Through the complete training process, the DVOP specialists, WIOA and Wagner-Peyser staff will work in conjunction with the business service team to assist eligible veterans and persons to identify employment opportunities through the state labor exchange. The tools in which we measure the services provided include but not limited to:

- Interviewing of Job Service Center staff
- Monitoring MWorks
- Review of program files and documentation
- Customer surveys
- Site visits
- Accompanying DVET during federal audits
- Quarterly Managers Report
- Regional Director meetings

### **(h) The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff.**

Dan Altmaier DVOP - Hired in current position 9/30/13 training completed training 6/1/14, Billings Job Service 2121 Rosebud Drive, Stop B Billings, MT 59102

Eric Beal DVOP - Hired in current position 7/18/16 completed training 6/1/17  
Bozeman Job Service 121 N Wilson Bozeman, MT 59715

Open Position – currently recruiting  
Butte, Job Services 2201 White Blvd Butte, MT 59701

Justin Kendhammer DVOP - Hired 7/6/18 Completed training 2/22/2019, Helena Job Service 715 Front Street Helena, MT 59620

Ian Kerr DVOP - Hired 6/11/18 Completed training 11/11/2018, Polson Job Service 417 B Main Street Polson, MT 59860

Danny Williams LVER/DVOP - Hired 11/1/11 training completed 02/26/21, Great Falls Job Service 1018 7th Street South Great Falls, MT 59405

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James Graham DVOP- Hired 10/16/21 Training in progress. Flathead Job Service 427 First Ave East Kalispell, MT 59901

Shannon Noble DVOP - Hired 12/3/12 completed training 5/1/13, Missoula Job Service 539 S Third W Missoula, MT 59806

Nick Moschetti SVC- Hired 8/1/16 completed training 8/1/17, MT Department of Labor & Industry Central Office PO Box 1728 Helena, MT 59624

(i) Such additional information as the Secretary may require.

### JVSG PROGRAM

	PROGRAM YEAR 2021 EXPECTED LEVEL	PROGRAM YEAR 2021 NEGOTIATED LEVEL	PROGRAM YEAR 2022 EXPECTED LEVEL	PROGRAM YEAR 2022 NEGOTIATED LEVEL
EMPLOYMENT (SECOND QUARTER AFTER EXIT)	48%	48%	48%	48%
EMPLOYMENT (FOURTH QUARTER AFTER EXIT)	46.5%	46.5%	46.5%	46.5%
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	\$5,555	\$5,555	\$5,555	\$5,555

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### SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM

The Senior Community Service Employment Program (SCSEP) program, authorized by Title V of the Older Americans Act is the federally sponsored employment and training program targeted specifically to low-income older individuals who want to enter or re-enter the workforce.

(a) **ECONOMIC PROJECTIONS AND IMPACT:**

- (1) Discuss the 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))

According to data from the Quarterly Workforce Indicators (2018 data, U.S. Census Bureau's Center for Economic Studies), the healthcare and social assistance industry hires the most Montanans 55 and older, followed by retail trade and education services. In fact, research by the Department's Research & Analysis Bureau suggests Montana's nursing workforce is older than the national average, adding to the high levels of job demands for this occupation. (Watson, 2016, <https://lmi.mt.gov/docs/Publications/LMI-Pubs/Special-Reports-and-Studies/Nursing-Report.pdf>). Opportunities for healthcare employment are favorable, with expected new job growth of over 1,000 jobs per year in health care, with additional job openings expected from retirements and turnover. Nursing occupations, medical and dental assistance, health information technology specialist, pharmacy technicians, and home health care aides have consistently been among the top jobs for openings and worker needs in Montana for over a decade.

Retail jobs also provide unique opportunities for older workers who wish to remain active in the workforce while also enjoying a semi-retired status. Although labor force participation rates for Montanans over 75 is still relatively low compared to other age groups at 8.4%, Montana has the 5<sup>th</sup> highest labor force participation rate for this group of workers among 50 states (2017 American Community Survey, U.S. Census Bureau). Older workers remain an important component for Montana's overall worker supply.

- (1) 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))

Given the worker needs and current workforce in Montana's healthcare industry, the industry makes a good target for future employment of SCSEP participants. There are employment opportunities at every education level, and for workers with different skills and interests. Nursing positions are open at the lower skilled nursing assistant positions, at the mid-skill Licensed Practical Nurse (LPN) positions, and at the high skill Registered Nurse (RN) and Advanced Practiced Registered Nurse (APRN) positions.

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There are also open positions in nearly every community across the state, making nursing occupations an excellent target for worker training.

However, if the SCSEP participant has different interests and backgrounds than appropriate for nursing, there are several different occupations in healthcare requiring different skill training. Non-healthcare occupations within the healthcare field include personal care aides, medical secretaries, maids and housekeepers, receptionists and information clerks, billing clerks, cooks and food service, and social workers are also needed, with worker demand exceeding 150 workers per year, which has only increased since the onset of the COVID Pandemic.

**(2) 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))**

The current and projected employment opportunities for SCSEP participant are identified in (1) and (2). Generally, SCSEP participants have little or poor work history with very little skills, therefore the types of skills available among the eligible populations will have direct implications for recruiting host agencies; the types of training positions available at host agencies; skill training offerings that the grantees can locate or develop; and other training linkages. The focus is to prepare older workers for these jobs through community service placements as well as coordinating and co-enrolling, as appropriate, with WIOA Title I programs or other programs such as Vocational Rehabilitation to provide older workers the opportunity for the occupational skills training to help participants obtain the skills needed for these jobs. SCSEP participants also register at Job Service Workforce Centers where they can benefit from Wagner-Peyser job search and placement programs.

**(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))**

Montana's SCSEP grantee achieves integration of SCSEP with WIOA Title I Adult and Dislocated Worker Programs, Wagner-Peyser Programs, Montana's business community, and other partners by engagement and membership with Community Management Teams (CMT), which include core partners and community-based partners. In addition, the state SCSEP sub-grantee staff coordinate services through the one-stop system by serving clients in the one-stop's office space to ensure clients are able to receive additional services from WIOA and other co-located partners as appropriate.

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Specifically, the SCSEP grantee, Easterseals-Goodwill Northern Rocky Mountain (ESGW NRM) refers all clients to Wagner-Peyser for job search, client registration, and assessment. Once client intake is complete, the client is then referred to other WIOA Title I programs and partner programs for co-enrollment as appropriate. ESGW also partners with the Community Management Teams across the state and is coordinating with participating providers for referrals to and from their agencies. Additionally, ESGW is working with several of the economic development entities in the state to collaborate and leverage resources.

ESGW NRM have an Employment Specialist/Recruiter position in Montana, located in Kalispell, to perform recruitment duties across the State of Montana. ESGW NRM also have a Job Developer who is available to assist with job search, resumes, applications, interviewing skills, etc.

**(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))**

Montana's SCSEP grantee, through a contract with the State SCSEP sub-grantee, partners with and administers some of the following programs under OAA and USDOL to help older workers:

- AARP
- Adult Protective Services Transportation Advisory Councils
- Community-based health centers
- Community-based transportation providers
- Montana's Area Agencies on Aging
- Montana Department of Labor & Industry Programs
- Montana Independent Living Centers
- Private non-profit agencies providing employment services
- Veteran service providers
- County Extension offices
- Community-based organizations, including:
  - Easterseals Goodwill
  - Good Samaritan
  - St. Vincent DePaul
  - Salvation Army Ministries
  - Rocky Mountain Development Council
  - Human Resource Development Council
  - Habitat for Humanity
  - Local food banks
- Vocational Rehabilitation and Blind Services
- Montana's Native American tribes

Montana's SCSEP grantee coordinates activities with the groups listed above by partnering and attending conferences and job fairs offered and coordinate education opportunities about SCSEP. In addition, many of the community-based organizations also serve as host agencies for training of SCSEP participants. The SCSEP grantee will

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continue coordinating services across partner programs and looking for additional opportunities to partner throughout the state to best serve SCSEP participants. Planned activities with partners vary across the state based on the availability of services, population, and community need. Activities and coordination of services across partners, include, but aren't limited to:

- Job fairs;
- Conferences;
- Participation in community-based boards or councils designed to coordinate services across common populations, including seniors;
- Economic development boards or groups, like local Chambers of Commerce or other business groups.

**(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))**

Montana's SCSEP grantee coordinates with partner agencies focused on serving individuals with disabilities throughout the state. Some examples of partner agencies and programs include, but are not limited to:

- Vocational Rehabilitation and Blind Services administered through Montana's Department of Public Health and Human Services;
- Montana's Independent Living Project;
- Businesses and host agencies engaged in employment and training for participants;
- Workforce programs administered throughout the state;

In addition to the examples listed above, Montana's SCSEP grantee works with community-based organizations throughout the state to best serve individuals based on their location and specific needs.

Montana's SCSEP plans to coordinate with other partner agencies on job fairs, targeted outreach to potential clients, community-based education about the programs, client coordination for co-enrollments, and coordinating on local and community-based boards and councils to best serve shared populations.

**(D) Planned actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))**

SCSEP has not participated in planning processes to apply for DOL-funded industry training initiatives; however, ESGW, the SCSEP grantee, participates at the local and community level across the state as a part of the Community Management Team, and through economic development collaborations within regions throughout the state. ESGW has SCSEP offices located in Great Falls, Missoula, Kalispell, and Billings. Due to Montana's geographic size and industry mix, the Employment Specialists in the region work collaboratively with the area partners to identify industry sectors and workforce

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development opportunities and needs within the region. This enables SCSEP to work within the groups to ensure training opportunities are available for the older populations it serves, in occupations that are going to be valuable training grounds to prepare participants for employment.

**(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)**

To facilitate coordination through the one-stop system, Montana's SCSEP grantee participates at the community level by participating in Community Management Teams and other community-based workforce initiatives. The grantee's participation ensures that older workers are afforded the same opportunities as any other subgroup receiving services through workforce programs.

To ensure the program has a community presence, staff work with community-based partners outside the one-stop system to serve clients. Additional partners include public libraries, other social service agencies and private businesses who offer services and space in their facilities.

**(F) Efforts to work with local economic development offices in rural locations.**

The SCSEP grantee collaborates with economic development offices throughout the state in order to promote and educate economic development entities about the benefits of employing and working with older workers. In addition, economic development staff are represented on many Community Management Teams across the state. This provides additional opportunity for collaboration on SCSEP programs.

**(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.)**

Montana's SCSEP grantee coordinates with the state's One-Stop System to engage with employers and businesses throughout the state. Because employer recruitment is an important component to successfully place participants, it's a priority for the SCSEP program. Recruitment efforts include an education component designed to inform employers about the benefit and value of hiring older workers and making opportunities available to them. Employer and business engagement has strengthened relationships and resulted in increased placement of SCSEP participants in unsubsidized employment across Montana. The SCSEP grantee will continue engaging with employers, the business community, and the One-Stop System to ensure SCSEP participants are best served throughout the state and increase their employment opportunities. SCSEP Employment Specialists are reaching out to employers on a statewide basis to raise awareness of the program, and the benefits of hiring participants in unsubsidized employment.

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### (3) The State's long-term strategy for serving minority older individuals under SCSEP. (20 CFR 641.302 (c))

Montana's SCSEP grantee receives an annual minority report from the US Department of Labor about Montana's minority populations. This report is used to determine if the program is underserving minority populations and develops a plan about how to best serve minority populations across the state. The current demographic information for Montana's SCSEP grantee is below:

Minority Groups	U.S. Census	2019 Minority Report II	PY 2020-Q2 YTD MT
Overall	12.0%	23.3%	28%
Hispanic	1.8%	10.0%	10%
Black	4%	0%	2%
Asian	3.3%	0.0%	0%
American Indian	7.3%	15%	12%
Pacific Islander	0%	0%	0%

Montana's SCSEP grantee recruits minority participants by direct outreach to minority churches, organizations, community-based agencies that serve minority populations, and organizations that serve multi-cultural populations. SCSEP staff also give guest lectures and conduct workshops to recruit and educate groups about the program. In addition, SCSEP advertises in local newspapers, including tribal newspapers, and senior publications to promote the program.

The SCSEP grantee directly serves two of Montana's reservation communities and is active on the remaining four reservations to ensure services are available to potential program participants.

The long-term strategy for best serving and increase services and outcomes for minority populations throughout the state is to build on current relationships with community-based partners and increase awareness and provide training to all employees and partners on diversity issues. In addition, the Diversity and Inclusion committee, comprised of the organizations listed above, focuses on building relationships with minority organizations to foster a culturally sensitive workplace and measure the effectiveness of recruitment efforts. Outreach materials that encourage minorities to apply are distributed throughout the Montana SCSEP areas with all materials made available in Spanish and will be converted to other languages as requested.

Montana's grantees will continue to increase the efforts to serve minorities by providing field staff with an analysis and work with them when and wherever there are areas that have noted disparities to identify causes.

### (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



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location of those individuals most in need of community services and the groups working to meet their needs. (20 CFR 641.330)

When demographic and economic data is available Easterseals-Goodwill NRM works with other Montana agencies, including one-stop partners to serve populations most in need throughout the state.

SCSEP serves 49 of the 56 counties across Montana and the areas that most need the SCSEP program are the hardest to serve communities. These communities are often remote and rural with limited commerce and limited employment opportunity. Most Montana counties fall under a hard-to-serve designation and there is a variance in place for both the national and state SCSEP grantee reflecting this. Montana continues monitoring and analyzing community service needs across the state in an effort to better serve current and potential participants.

Throughout the state there is more demand for services provided under SCSEP than the program has the capacity to provide. In addition, the low population densities and large distances between clients in hard-to-serve counties makes service delivery particularly challenging. Additionally, rural areas often have limited opportunity for community service assignments, training and jobs for participants.

Senior populations that benefit from community service work are those with time and energy, seniors over 65, ex-convicts, retired people (especially farmers and ranchers), all age groups if capable of physical work, the unemployed, and economically disadvantaged older persons.

Common local community service needs in Montana include:

- Janitors, cooks, librarians, teacher aides, or mentoring in schools
- Working in prisons
- Jobs in tourist areas
- Cleaning road ditches and doing flower enhancements along streets or in parks
- Providing office support services for nonprofits, municipal, county, state, and federal agencies
- Making signs
- Serving as job developers
- Advising local businesses
- Cleaning rest areas
- Providing after-school programs and childcare for children
- Gift-shop attendants
- Service attendants for food pantries and clothing give-away programs

(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))

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Easterseals-Goodwill NRM is focused on serving eligible clients by providing training opportunities to improve or build skill levels for jobs available in communities. Long-term, the program's goal is to assure that job matching is appropriate for both the employer and older worker so that the relationship will be retained to the benefit of the employer, the older worker and the state's economy.

SCSEP is committed to growing and sustaining partnerships with nonprofits, public agencies, and community partners throughout the state to ensure the program is able to adequately serve Montana's older workers and meet its negotiated goals.

To ensure Montana's SCSEP participants obtain the skills necessary to compete in the modern workforce, the program is doing the following:

- Help SCSEP participants attain the skills (such as computer and healthcare-related skills) to better fill the employment needs in the state; to this end, 15 iPads ESGW NRM purchased from a grant that ESGW NRM applied for, and those iPads are being distributed to our offices across the state, to check out to participants. This will enable participants to gain skills in working on a computer, as ESGW NRM will provide them a convenient link to training materials of all types.
- Work with and expand on the nonprofit agencies to provide meaningful community service assignments that fill a current need within the community; ESGW NRM are reaching out to previously untapped agencies, to engage them in our program.
- Work with businesses and nonprofit agencies to develop good training assignments where skills are learned on-the-job and unsubsidized employment will be the end result in more situations; this has been a successful model, many of our participants are hired by their host agency when training is complete.
- Assist the business community in finding ways to attract and employ the older worker
- Educate businesses about the value of hiring older workers; ESGW NRM continue to provide professional marketing materials to educate and engage host agencies and employers.
- Continue coordinating and partnering with Montana's One-Stop System
- Target services to American Indians by working more closely the WIOA 166 grantees
- Expand Area Agencies on Aging referrals
- Develop and sustain partnerships with groups that advocate and provide services to people with disabilities, minority populations, and veterans
- Expand coordination with the state of Montana's Aging and Disability Resource Center (ADRC) program
- Expand business relationships with Montana Chambers of Commerce.

**(6) The State's strategy for continuous improvements 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))**

ESGW has developed the following strategies for continuous improvements:

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- **Targeting Jobs:** SCSEP has been successful in placing participants in unsubsidized employment with community service agencies and host agency training sites. A significant portion of SCSEP's unsubsidized placement occurs when the community service training site hires SCSEP participants that trained on-site.
- **Partnership with Montana's One-Stop System:** SCSEP monitors information on job opening and trends, through partnerships with the One-Stop System, that identify current and future regional job opportunities.
- **Workforce Partnerships:** SCSEP has established relationships with the following workforce partners:
  - o Job Service, which administers WIOA Title I Adult and Dislocated Worker programs, the Wagner-Peyser program, and other workforce programs;
  - o Vocational Rehabilitation Services;
  - o Adult Services and Aging programs;
  - o Adult Education programs; and
  - o Local economic development and business associations.
- **Upgrading and maintaining participant skills:** Participant training is key to successful program performance. Older workers often have employability skills that employer's value; however, older workers often lack technical skills to succeed in the modern workforce. SCSEP participants are more often successful in the workforce because of training provided through the program and employer engagement.
- **Ongoing Assessments of Skills:**

SCSEP participants are assessed utilizing a variety of tools, some through the American Job Centers, as well as through consultation with their Employment Specialist. An Individual Employment Plan is created, and an assignment in either a host agency, or to job readiness skills is made. Training on-line through GFCGlobal.org is available to those that have internet/computer access at home, as well as it being available in our offices. Training courses can result in certification of skills following successful testing of the subject matter. Many participants take advantage of this training as it can be done at any time from any computer. Each potential applicant is assessed to determine their interests and current skill level. In addition, participants are assessed for their physical abilities and offered a general physical to ensure participants are trained and placed in appropriate employment settings. Assessment is ongoing for participants based on their Individual Employment Plan, and throughout their participation in the program.

- **Expanding and maintaining partnerships with the business community:** SCSEP continues to work with the business community to gather input from the business community on the workforce needs. In addition, SCSEP works closely with business partners to ensure participants placed within an organization are adequately trained to meet the job requirements. Input received from the business community enables SCSEP grantees and the workforce community to provide more meaningful training opportunities for older workers and find opportunities for unsubsidized job placement with a higher degree of retention.

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In addition to the strategies for continuous improvement listed above, ESGW provides a quarterly report that is reviewed, and technical assistance is provided in areas needing improvement if needed.

**(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))

ESGW serves clients statewide, and Montana is geographically large and highly rural which creates challenges for serving clients throughout the state. The SCSEP grantee works with a number of partners and agencies to overcome those challenges. Partners include the following:

- AARP
- Adult Protective Services Transportation Advisory Councils;
- Community-based health centers;
- Community-based transportation providers;
- Montana's Area Agencies on Aging;
- Montana Department of Labor & Industry Programs;
- Montana Independent Living Centers;
- Private non-profit agencies providing employment services;
- Veteran service providers;
- County Extension offices;
- Community-based organizations, including:
  - Easterseals-Goodwill;
  - Good Samaritan;
  - St. Vincent DePaul;
  - Salvation Army Ministries;
  - Rocky Mountain Development Council;
  - Human Resource Development Council;
  - Habitat for Humanity;
  - Local food banks; and
  - A relationship with state-wide correctional facilities and Probation and Parole offices has also been established to recruit more participants in need/
- Vocational Rehabilitation and Blind Services; and
- Montana's Native American tribes.

Service delivery in rural counties like Custer, Fallon, Fergus, Jefferson and Judith Basin are more challenging due to the remote or economically depressed conditions that exist. In addition, barriers that exist limit opportunities for community service assignments, training, and jobs. The most populated counties in the state like Flathead, Lewis & Clark, Gallatin, and Yellowstone have the majority of hard-to-serve seniors.

The state collects, monitors, and analyzes community service needs throughout the state on an ongoing basis. ESGW uses information collected by the state, including labor

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market information, economic reports, and other information provided through the state of Montana's Research and Analysis Bureau to understand the state's workforce and economic picture and target training and outreach based on data provided.

Community service needs are identified across the state and consistently, SCSEP participants need assistance with the following:

- Utilities
- Food
- Clothing
- Weatherization
- Household items
- Transportation
- Legal assistance
- Language learning and tutoring
- Disability services
- Literacy

**(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.**

County	Cities	PY'20 State Grantee AP	PY'20 National Grantee AP	PY'21 State Grantee AP	PY'21 National Grantee AP
Beaverhead	Dillon	0	3	0	2
Big Horn	Pryor, Harden, Lodge Grass	2	2	2	1
Blaine	Chinook	0	2	0	2
Broadwater	Townsend	0	2	0	2
Carbon	Red Lodge	0	4	0	3
Carter		0	0	0	0
Cascade	Great Falls, Cascade, Belt	5	15	5	13
Chouteau	Fort Benton	0	1	0	2
Custer	Miles City, Lame Deer, Ashland	1	3	1	2
Daniels		0	0	0	1
Dawson	Glendive	0	2	0	1
Deer Lodge	Anaconda	0	3	0	4
Fallon		0	0	0	1
Fergus	Lewistown	0	4	0	3
Flathead	Kalispell, Whitefish, West Glacier, Big Fork, Coram	8	15	8	14

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Gallatin	Bozeman, Belgrade	4	7	4	8
Garfield		0	0	0	0
Glacier	Cut Bank, Browning	0	5	0	6
Golden Valley		0	0	0	0
Granite		0	0	0	1
Hill	Havre	0	4	0	3
Jefferson	Boulder	0	3	0	2
Judith Basin		0	0	0	1
Lake	Polson, Elmo, Ronan, Pablo	6	5	5	4
Lewis and Clark	Helena, East Helena, Augusta, Lincoln	5	6	6	8
Liberty		0	0	0	1
Lincoln	Libby	0	9	0	10
Madison	Virginia City	0	3	0	3
McCone		0	0	0	1
Meagher	White Sulphur Springs	0	1	0	1
Mineral	Superior	0	2	0	2
Missoula	Missoula, East Missoula, Frenchtown	7	13	7	14
Musselshell	Roundup	0	2	0	2
Park	Livingston	0	5	0	5
Petroleum		0	0	0	0
Phillips	Malta	0	2	0	2
Pondera	Conrad	0	2	0	2
Powder River	Broadus	0	1	0	1
Powell	Deer Lodge	0	2	0	1
Prairie	Terry	0	1	0	0
Ravalli	Hamilton, Stevensville, Corvallis, Darby	5	12	5	11
Richland	Sidney	0	2	0	3
Roosevelt	Wolf Point	0	3	0	3
Rosebud	Forsyth	0	3	0	3
Sanders	Thompson Falls	0	5	0	5
Sheridan	Plentywood	0	1	0	1
Silver Bow	Butte	0	11	0	11
Stillwater	Columbus	0	3	0	2
Sweet Grass	Big Timber	0	1	0	1
Teton	Chouteau	0	2	0	2
Toole	Shelby	0	1	0	2

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Treasure		0	0	0	0
Valley	Glasgow	0	2	0	3
Wheatland	Harlowton	0	1	0	1
Wibaux	Wibaux	0	1	0	0
Yellowstone	Billings, Park City, Ballantine, Laurel	9	22	9	24
TOTAL AP		52	199	52	201

Counties not served by  
State Grantee

Counties not served by  
SCSEP

### (3) Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.

The U.S. Department of Labor at their website SCSEPED.org provides quarterly data that shows the number of authorized positions, the number of current enrollments at the end of the last quarter, and the variances in each county. The Montana Department of Labor and Industry and the sub-grantee uses this website and tool as a method to keep abreast and manage the slots to assure equitable distribution of positions. Montana had two major changes to SCSEP in 2020, partially due to Covid-19 restrictions and concerns and Montana losing its National Grantee and state subgrantee.

Montana National Grantee is Goodwill Industries International (GII) and the state subgrantee is Easter-Seals Goodwill (ESGW), Northern Rocky Mountain Inc. ESGW is also the subgrantee for GII which is favorable for a positive partnership between both the State and National Grantee.

Montana is currently being underserved due in part to host agencies closing their doors because of Covid; and the reluctance of participants in doing any community services activities (CSA). The subgrantee will focus on: (1) recruitment in the currently underserved counties through increased coordination efforts with WIOA, Older Americans Act programs, private and public entities, and local economic development offices; and (2) continue to work with participants to find explore alternative methods for training including remote training.

The SCSEP grantee continues to work toward equitable distribution in each county. There are no counties that are significantly over-served or under-served with a variance of 1-5 of their equitable share based on U. S. Census **2010** data.

### (4) The State's long-term strategy for achieving an equitable distribution of SCSEP positions within the State that:

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#### (B) Moves positions from over-served to underserved locations within the State in compliance with 20 CFR 641.365.

ESGW has been aggressively promoting the SCSEP throughout the state. Participants are asked to actively recruit friends, family, and any seniors that may be interested in the program. Employment Specialists have dropped off and mailed our professionally done marketing materials, posters with tear tabs, etc., to our partners and anywhere seniors may frequent. This same activity is taking place throughout the state with libraries, senior centers, quick stop convenience stores, veteran's centers, agencies on aging, food pantries and distribution centers, subsidized housing facilities, service organizations, correctional facilities and probation and parole offices, and others who commonly or regularly come in contact with our age demographic.

ESGW works regularly with Montana One-Stop Service Centers and Employment Specialists have established working relationships with them for referral purposes. ESGW NRM have a Job Developer who has connections all across the areas our organization serves and assists participants to search for and find appropriate job openings for our qualified, job-ready participants. The Job Developer also assists with resume preparation, applications, and interviewing skills. Employment Specialists regularly connect with current participants and ask them if any of their friends, neighbors, or acquaintances might benefit from the SCSEP job-training program.

The common goal for both SCSEP grantees is to distribute the workers served by the program in accordance with the equitable distribution of positions per county. The SCSEP grantees are consistently working toward equitable distribution in each county. There are no counties that are significantly over-served or under-served based on U. S. Census 2010 data. Under-enrollment in some counties may be due to the large, rural, and sparsely populated rural areas that also have a higher unemployment rate than the state's average unemployment rate. Over-enrollment in some counties may be due to those counties being more urban in nature with one of them being the largest city in the state. The concentrated population in these counties generally leads to a push to enroll more participants because they provide the most opportunities for outreach to potential enrollees and employers. SCSEP grantees work closely to coordinate recruitment and enrollment efforts and to determine the potential to move authorized positions at some point. If positions become vacant through attrition, the position will be filled from the current waiting list. This will ensure Montana's counties are served appropriately so that authorized positions in the counties more closely align with equitable distribution.

There have not been any significant large increases of eligible persons in any of our Montana counties.

#### (C) Equitably serves rural and urban areas.

The SCSEP grantees are consistently working toward equitable distribution in each county. As stated earlier there are no counties that are significantly over-served or under-served based on U.S. Census 2010 data.



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Under-enrollment in some counties may be due to the large, rural, and sparsely populated areas that also have a higher unemployment rate than the state's average. Over-enrollment in some counties may be due to those counties being more urban in nature. The concentrated population in these counties generally leads to a push to enroll more participants because they provide the most opportunities for outreach to potential enrollees and employers.

SCSEP grantees work closely to coordinate recruitment and enrollment efforts and determine the potential to move authorized positions at some point. If positions become vacant through attrition, the position will be filled from the current waiting list. This will ensure Montana's counties are served appropriately so that authorized positions in the counties more closely align with equitable distribution.

The national SCSEP grantee has authorized positions in forty-nine counties out of the total fifty-six counties in Montana. Ten of these counties also have state-designated positions. Even with population shifts each year that cause some counties to be over-served and some to be under-served, the authorized numbers meet the Census figures.

(D)Serves individuals afforded priority for service under 20 CFR 641.520. (20 CFR 641.302(a), 641.365, 641.520)
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Montana state SCSEP priority for service is provided to eligible individuals who meet one or more of the following criteria:

- Aged 65 years or older
- Have a disability
- Have limited English proficiency or low literacy skills
- Reside in a rural area
- Are veterans or their spouses who meet the requirements of the Jobs for Veterans Act
- Have low employment prospects
- Have failed to find employment after using services provided through the one-stop delivery system
- Are homeless or at risk of homelessness
- Was formerly incarcerated or under supervision from release from prison or jail within five (5) years of the date of initial eligibility determination.

Montana's SCSEP goal is to serve these populations at least in proportion to their percentage of the total population. Program activities are provided to ensure successful participation of these groups. Each applicant's eligibility is determined by an interview and documented on an intake form.

The long-term strategy for increased services to these populations is through additional training, community-outreach, participation in job fairs or other community recruitment or education events, and increased partnerships with organizations serving any of the priority populations listed above.

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#### (5) The ratio of eligible individuals in each service area to the total eligible population in the State. (20 CFR 641.325(a))

Montana uses the most current Equitable Distribution Report to reflect the number of eligible individuals in each county to the total eligible population in the state. Montana is primarily rural in nature and according to the Montana 2010 Census there are three counties classified as urban areas:

- Cascade County whose total population 81,327 - 80.2% of the population considered as being in an urban cluster and 19.8% rural
- Missoula County, whose total population is 109,299 - 77.7% of the population considered as being in an urban cluster and 22.3% rural
- Yellowstone County, population 147,972 - 83.3% of the population considered as being in an urban cluster 16.7 of the population are rural

The remainder of Montana's counties are rural:

- Big Horn County; Population 13,242; 10% of Eligible Population; 2 Authorized Positions; Ratio 671:1
- Cascade County; Population 82,384; 45.4% of Eligible Population; 5 Authorized Positions; Ratio 7480:1
- Custer County; Population 11,951; 17.5% of Eligible Population: 1 Authorized Positions; Ratio 1045:1
- Flathead County; Population 93,068; 17.7% of Eligible Population; 8 Authorized Positions; Ratio 2059:1
- Gallatin County; Population 94,720; 9.5% of Eligible Population; 4 Authorized Positions; Ratio 2999:1
- Lake County; Population 29,017; 16.8% of Eligible Population; 5 Authorized Positions; Ratio 975:1
- Lewis and Clark County; Population 65,338; 13.8% of Eligible Population; 6 Authorized Positions; Ratio 1503:1
- Missoula County; Population 111,807; 11.4% of Eligible Population; 7 Authorized Positions; Ratio 1159:1
- Ravalli County; Population 40,823; 19.2% of Eligible Population; 5 Authorized Positions; Ratio 1567:1
- Yellowstone County; Population 154,162; 14.1% of Eligible Population; 9 Authorized Positions; Ratio 3,623:1

#### (6) The relative distribution of eligible individuals who: (A) Reside in urban and rural areas within the State

The SCSEP Equitable Distribution report is the primary means for providing the state with the data it needs to ensure that all eligible populations and target groups are properly served. The formula outlines the service level to individuals residing in urban and rural areas within the state, those that have the greatest economic need, minorities, individuals with limited English proficiency, and those who have the greatest social need.

Montana is a very large, rural state with ongoing challenges and barriers. Challenges and barriers include:

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- Shortages of quality host agencies that can provide the training that matches the employment goals for participants
- Shortages of employers that have a presence in the rural areas that are seeking new employees in general
- The economy in some of the counties is depressed
- Public transportation is available in the larger communities but is non-existent in the very rural areas

It is very difficult, in the most rural areas of Montana, to recruit both eligible participants and develop host agencies due to distance, language, transportation, etc. These challenges make it essential that both rural and urban areas are served equitably and that older workers living in rural areas have access to the same training and employment resources as those living in urban areas.

The SCSEP grantee makes every effort to accommodate enrollees whenever suitable arrangements can be made including flexibility in scheduling training. The SCSEP grantee coordinates and works with organizations within communities to:

- Address rural needs using small scale methods appropriate to the uniqueness of each community
- Identify the inequities in resources to equitably serve SCSEP participants in both rural and urban counties across the state
- Identify those inequities specific to rural areas that can be changed or addressed and promote the development of new training sites and employment opportunities for participants
- Identify tools and resources to rally communities to help with the needs of the eligible population

#### **(B) Have the greatest economic need**

Currently 90% of Montana's SCSEP participants are living in poverty and want or need to work to pay for necessities, including food, housing, healthcare, and transportation. Many SCSEP participants are below the age of 65 and may not receive Social Security benefits, therefore, they need to supplement their income through employment.

#### **(C) Are minorities**

In Montana American Indians are the main minority population and enrollment was at 11% of total enrollments. This minority population is underserved in SCSEP based on the number of the eligible population. Montana has seven reservations, three of which are in or near the most heavily populated counties. The SCSEP grantee works with local agencies and representatives in areas on or near the reservations to target recruitment activities. The total minority population within Montana's SCSEP is approximately 26% of the total enrollments. The following are minority statistics of participants pulled from the PY'20 year end performance report: American Indian 11% Asian/Native Hawaiian/Pacific Islander 0% Black or African American 4% Hispanic, Latino or Spanish Origin 9%. The SCSEP grantee is made aware of individuals who are new to communities and may be in need of SCSEP training opportunities through professional

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networks and Montana's One-Stop System. Statewide outreach by the SCSEP grantee allows for proactive identification of minority individuals in need of services.

### **(D) Are limited English proficient**

As of the PY'20 final quarter report 0% of participants served were limited English proficient. The SCSEP grantee uses the same recruitment techniques for individuals who are limited English proficient as the recruitment of other most-in-need populations. Recruitment efforts include recruitment through the one-stop system; advertisements; local organizations; and working closely with local community members of ethnic or cultural groups to identify limited-English speaking individuals.

### **(E) Have the greatest social need. (20 CFR 641.325(b))**

Many individuals served under SCSEP qualify as having a great social need because of the rural nature of Montana. Criteria for an individual with the greatest social need include participants with little or no employment history, no basic skills, no high school education or identified as a high school drop-out, English language deficient, disabled, homeless, or living in a socially or economically isolated area where there are limited employment opportunities.

There is currently no metric for social need outside of measuring individuals with disability. SCSEP's PY'20 final quarter end report showed that 71% of enrolled participants had some form of disability with 29% of those individuals having a severe disability.

### **(7) A description of the steps taken to avoid disruptions to the greatest extent possible, when positions are redistributed, as provided in 20 CFR 641.365; when new Census or other reliable data become available; or when there is over-enrollment for any other reason. (20 CFR 641.325(i), 641.302(b))**

Montana's SCSEP grantees will ensure that individuals who want to work have the opportunity to do so through the services SCSEP provides. The US Department of Labor provides the distribution factor based on current census data. The distribution factor is the current formula for defining the equitable share of SCSEP positions for each county based on the proportion of income and age-eligible population by county annually. The SCSEP grantees determine which counties are over or underserved and calculates the movement of positions in order to bring about equity. Montana's SCSEP grantees ensure there is either no or minimal disruption to participants and service delivery throughout the years due to redistribution of funds. The equitable distribution report is submitted to the US Department of Labor for approval annually.

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### PERFORMANCE INDICATOR APPENDIX

#### APPENDIX 1: PERFORMANCE GOALS FOR THE CORE PROGRAMS

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.

	TITLE I – ADULT PROGRAM			
	PROGRAM YEAR: 2021		PROGRAM YEAR: 2022	
	EXPECTED LEVEL	NEGOTIATED LEVEL	EXPECTED LEVEL	NEGOTIATED LEVEL
EMPLOYMENT (SECOND QUARTER AFTER EXIT)	<del>71.0%</del> 71.0%	71.0%	<del>71.0%</del> 71.0%	71.0%
EMPLOYMENT (FOURTH QUARTER AFTER EXIT)	<del>68.0%</del> 70.0%	70.0%	<del>68.0%</del> 70.0%	70.0%

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<b>MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)</b>	<del>\$6,159</del> <del>\$6,159</del>	<del>\$6,159</del>	<del>\$6,159</del> <del>\$6,159</del>	<del>\$6,159</del>
<b>CREDENTIAL ATTAINMENT RATE</b>	<del>53.0%</del> <del>53.0%</del>	<del>53.0%</del>	<del>53.0%</del> <del>53.0%</del>	<del>53.0%</del>
<b>MEASURABLE SKILL GAINS</b>	<del>55.0%</del> <del>58.0%</del>	<del>58.0%</del>	<del>55.0%</del> <del>58.0%</del>	<del>58.0%</del>

	TITLE I – DISLOCATED WORKER PROGRAM			
	PROGRAM YEAR: 2021		PROGRAM YEAR: 2022	
	EXPECTED LEVEL	NEGOTIATED LEVEL	EXPECTED LEVEL	NEGOTIATED LEVEL
<b>EMPLOYMENT (SECOND QUARTER AFTER EXIT)</b>	<del>71.0%</del> <del>71.0%</del>	<del>71.0%</del>	<del>71.0%</del> <del>71.0%</del>	<del>71.0%</del>
<b>EMPLOYMENT (FOURTH QUARTER AFTER EXIT)</b>	<del>70.0%</del> <del>70.0%</del>	<del>70.0%</del>	<del>70.0%</del> <del>70.0%</del>	<del>70.0%</del>
<b>MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)</b>	<del>\$7,000</del> <del>\$7,000</del>	<del>\$7,000</del>	<del>\$7,000</del> <del>\$7,000</del>	<del>\$7,000</del>
<b>CREDENTIAL ATTAINMENT RATE</b>	<del>53.0%</del> <del>53.0%</del>	<del>53.0%</del>	<del>53.0%</del> <del>53.0%</del>	<del>53.0%</del>
<b>MEASURABLE SKILL GAINS</b>	<del>56.0%</del> <del>56.0%</del>	<del>56.0%</del>	<del>56.0%</del> <del>56.0%</del>	<del>56.0%</del>

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	TITLE I – YOUTH PROGRAM			
	PROGRAM YEAR: 2021		PROGRAM YEAR: 2022	
	EXPECTED LEVEL	NEGOTIATED LEVEL	EXPECTED LEVEL	NEGOTIATED LEVEL
EMPLOYMENT (SECOND QUARTER AFTER EXIT)	<u>60.0%</u> <del>60.0%</del>	<del>60.0%</del>	<u>60.0%</u> <del>60.0%</del>	<del>60.0%</del>
EMPLOYMENT (FOURTH QUARTER AFTER EXIT)	<u>55.0%</u> <del>55.0%</del>	<del>55.0%</del>	<u>55.0%</u> <del>55.0%</del>	<del>55.0%</del>
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	<u>\$3,200</u> <del>\$3,200</del>	<del>\$3,200</del>	<u>\$3,200</u> <del>\$3,200</del>	<del>\$3,200</del>
CREDENTIAL ATTAINMENT RATE	<u>45.0%</u> <del>50.5%</del>	<del>50.5%</del>	<u>45.0%</u> <del>50.5%</del>	<del>50.5%</del>
MEASURABLE SKILL GAINS	<u>45.0%</u> <del>50.0%</del>	<del>50.0%</del>	<u>45.0%</u> <del>50.0%</del>	<del>50.0%</del>
	TITLE III – WAGNER-PEYSER ACT EMPLOYMENT SERVICE PROGRAM			
	PROGRAM YEAR: 2021		PROGRAM YEAR: 2022	
	EXPECTED LEVEL	NEGOTIATED LEVEL	EXPECTED LEVEL	NEGOTIATED LEVEL
EMPLOYMENT (SECOND QUARTER AFTER EXIT)	<u>67.0%</u> <del>67.0%</del>	<del>67.0%</del>	<u>67.0%</u> <del>67.0%</del>	<del>67.0%</del>
EMPLOYMENT (FOURTH QUARTER AFTER EXIT)	<u>65.0%</u> <del>65.0%</del>	<del>65.0%</del>	<u>65.0%</u> <del>65.0%</del>	<del>65.0%</del>
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	<u>\$5,600</u> <del>\$5,600</del>	<del>\$5,600</del>	<u>\$5,600</u> <del>\$5,600</del>	<del>\$5,600</del>
CREDENTIAL ATTAINMENT RATE	<u>Not Applicable</u> <del>Not Applicable</del>	<u>Not Applicable</u> <del>Not Applicable</del>	<u>Not Applicable</u> <del>Not Applicable</del>	<u>Not Applicable</u> <del>Not Applicable</del>
MEASURABLE SKILL GAINS	<u>Not Applicable</u> <del>Not Applicable</del>	<u>Not Applicable</u> <del>Not Applicable</del>	<u>Not Applicable</u> <del>Not Applicable</del>	<u>Not Applicable</u> <del>Not Applicable</del>

**STATE OF MONTANA**  
**WIOA COMBINED STATE PLAN**

	TITLE II – ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM			
	PROGRAM YEAR: 2021		PROGRAM YEAR: 2022	
	EXPECTED LEVEL	NEGOTIATED LEVEL	EXPECTED LEVEL	NEGOTIATED LEVEL
EMPLOYMENT (SECOND QUARTER AFTER EXIT)	<del>52.0%</del> 50%	Baseline	<del>52.0%</del> 51%	Baseline
EMPLOYMENT (FOURTH QUARTER AFTER EXIT)	<del>32.0%</del> 30%	Baseline	<del>32.0%</del> 31%	Baseline
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	<del>\$3,500</del> Not Applicable	Baseline	<del>\$3,500</del> Not Applicable	Baseline
CREDENTIAL ATTAINMENT RATE	<del>24.0%</del> 22%	Baseline	<del>24.0%</del> 23%	Baseline
MEASURABLE SKILL GAINS	<del>56.0%</del> 54%	Baseline	<del>56.0%</del> 55%	Baseline
	VOCATIONAL REHABILITATION PROGRAM			
	PROGRAM YEAR: 2021		PROGRAM YEAR: 2022	
	EXPECTED LEVEL	NEGOTIATED LEVEL	EXPECTED LEVEL	NEGOTIATED LEVEL
EMPLOYMENT (SECOND QUARTER AFTER EXIT)	<del>57.9%</del> Baseline	Baseline	<del>57.9%</del> Baseline	Baseline
EMPLOYMENT (FOURTH QUARTER AFTER EXIT)	<del>45.4%</del> Baseline	Baseline	<del>45.4%</del> Baseline	Baseline
MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)	<del>\$3,529.21</del> Baseline	Baseline	<del>\$3,529.21</del> Baseline	Baseline
CREDENTIAL ATTAINMENT RATE	<del>38.9%</del> Baseline	Baseline	<del>38.9%</del> Baseline	Baseline
MEASURABLE SKILL GAINS	<del>36.3%</del> 43%	Not Applicable	<del>36.3%</del> 44%	Not Applicable



**STATE OF MONTANA  
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	<b><u>JOBS FOR VETERANS STATE GRANTS PROGRAM</u></b>			
	<b><u>PROGRAM YEAR: 2021</u></b>		<b><u>PROGRAM YEAR: 2022</u></b>	
	<b><u>EXPECTED LEVEL</u></b>	<b><u>NEGOTIATED LEVEL</u></b>	<b><u>EXPECTED LEVEL</u></b>	<b><u>NEGOTIATED LEVEL</u></b>
<b><u>EMPLOYMENT (SECOND QUARTER AFTER EXIT)</u></b>	<u>48.0%</u>	<u>48.0%</u>	<u>48.0%</u>	<u>48.0%</u>
<b><u>EMPLOYMENT (FOURTH QUARTER AFTER EXIT)</u></b>	<u>46.5%</u>	<u>46.5%</u>	<u>46.5%</u>	<u>46.5%</u>
<b><u>MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)</u></b>	<u>\$5,555</u>	<u>\$5,555</u>	<u>\$5,555</u>	<u>\$5,555</u>