

WIOA STATE PLAN FOR  
THE STATE OF MONTANA

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## OVERVIEW

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

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## OPTIONS FOR SUBMITTING A STATE PLAN

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

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

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

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

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

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## HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

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

- The **Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth.
- The **Operational Planning Elements** section identifies the State's efforts to support the State's strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:
  - State Strategy Implementation,
  - State Operating Systems and Policies,
  - Assurances, and
  - Program-Specific Requirements for the Core Programs, and
  - Program-Specific Requirements for the Combined State Plan partner programs.

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.\* While discussion of and strategies for every target population is not expected, States must address as many as are applicable to their State's population and look beyond strategies for the general population.

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

## I. WIOA STATE PLAN TYPE

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

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

**Combined State Plan.** This plan includes the Adult Worker Program, Dislocated Worker Program, Youth Program, Wagner-Peyser 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.    Yes



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## COMBINED PLAN PARTNER PROGRAM(S)

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

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

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

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

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

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

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

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

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

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

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

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

## II. STRATEGIC ELEMENTS

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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. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs.

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

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

## 1. ECONOMIC AND WORKFORCE ANALYSIS

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### A. ECONOMIC ANALYSIS

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

This must include-

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

With unemployment rates at low levels for the last several years, and the aging Montana population retiring with not enough young workers to replace them, Montana businesses have been clamoring for more workers. Workers are needed in all occupations and industries.

That being said, there are some industries growing faster than others, thus requiring more workers, and occupations that require workers who require longer training periods. Montana has been experiencing faster employment growth in the knowledge-based jobs over the last several years, with rapid growth in the professional services. The development of industries requiring knowledge in computer programming, legal services, engineering, and other professional services is a positive development in Montana's economy, adding jobs at higher wage rates and increasing the educational requirement of Montana's overall job mix.

However, this growth has not been without some worker training challenges. Although the IT and professional workers rarely make the list of occupations with the most job openings, these professions still have the most critical workforce training needs due to a short supply. A recent report by the Montana Department of Labor and Industry compared the supply of graduates exiting Montana's public and private schools to the demand from employers. This report recommended the expansion of computer and information technology programs in the state to meet the growing demand for IT workers. Graduates with bachelor's degrees in computer science earn median income of \$53,184 five years after graduation, higher than the median income across all bachelor's degree graduation of roughly \$40,000 annually.<sup>1</sup>

Although professional services was the fastest growing industry in 2016, construction, agriculture & forestry, and accommodations have been the fastest growing industries in the past five years, with compounding average rates of growth of 3.6%, 4% and 2.9% respectively. Construction is expected to continue to be one of Montana's fastest growing industries in the next ten years, although both agriculture and accommodations are expected to moderate their growth. In the next ten years, there are expected to be 220 openings per year for carpenters, and 189 workers per year needed in maintenance and repair workers, general. Plumbers and electricians continue to be in high demand, and continue to be the two most popular registered apprenticeship programs in Montana. In the first year after graduation, plumbers and electricians earn average wages of roughly \$56,000 per year, over \$15,000 higher than the statewide average wage.<sup>2</sup>

In terms of number of jobs added, the healthcare industry has added over 2,100 jobs in 2016, and is expected to continue to add jobs in the future at about 1,300 per year. As the largest private employing industry in Montana, healthcare's strong and steady employment growth leads to a lot of jobs. The occupation of Registered Nurses is expected to require more workers than any other occupation among those that require at least a high school diploma or equivalency, with 450 expected openings per year. Nursing Assistants have the third highest worker needs among occupations requiring at least a high school diploma. Healthcare also offers wages that are higher than the state average, with an average wage of \$45,540 in the industry compared to \$40,735 for the

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<sup>1</sup> Watson, Amy et al. 2017. "Meeting State Worker Demand: A Report on the Labor Market Outcomes for Montana Colleges" Montana Department of Labor & Industry. Available at <http://lmi.mt.gov/Publications>.

<sup>2</sup> Klungtvedt, Emily. 2017. "Registered Apprenticeship Program Data Report" Montana Department of Labor & Industry. Available at <http://lmi.mt.gov/Publications>.

state.<sup>3</sup>

Construction is the industry with the next highest number of jobs being added in future years at an expected 830 jobs per year, then accommodation and food services at an expected 570 jobs per year. Construction includes many high-paying jobs that make excellent targets for worker training, but the accommodation and food service industry typically pays below average wages. However, these jobs can be critical for building work soft skills for inexperienced workers, or to provide part-time work for students, retirees, or others who can't commit to full time work.

Mining has experienced significant job loss in recent years, losing over 1,200 jobs in 2016. Slower job growth in the next ten years is expected for both oil and gas mining and coal mining. Both industries face unique challenges in retraining workers. Both oil and gas and coal mining are concentrated in the rural eastern region of Montana where job opportunities are less common. In addition, both industries pay fairly high wage earnings, making it difficult for workers to find jobs that offer replacement income.

## II. EMERGING INDUSTRY SECTORS AND OCCUPATION

Identified emerging industry sectors in Montana include research and technology clustering in the Bozeman area, manufacturing, breweries, and entrepreneurialism more generally. There has also been significant growth in breweries and distilling in Montana. Finally, Montana's manufacturing sector has the fastest growing GDP among all states, led by an expansion in petroleum refining.

Overall, Montana's manufacturing sector has been growing rapidly over the last ten years, with the fastest growing GDP in manufacturing among all states.<sup>4</sup> Cookie and cracker manufacturing has quadrupled employment levels in the last five years, but employment levels less than 20 employees. Plastics manufacturing has posted significant employment growth in the last five years, adding roughly 100 employees, with total employment levels at 424 in 2016. Other small manufacturing industries with large employment growth include clay products, primary metal manufacturing, aerospace products and parts manufacturing, electric motor vehicle parts manufacturing, surgical and medical instrument manufacturing, computer and electronic product manufacturing, fabricated metal manufacturing, and other nonmetallic mineral product manufacturing. Employment in nonmetallic mineral product manufacturing has increased by over 400 workers in the last five years for roughly 60% growth. Fabricated metal product manufacturing has added over 750 jobs over the last five years. With the growth in the manufacturing sector, wholesale trade employment has also increased.

Montana has seen a boom in the craft brewing industry, with employment in the manufacturing of beer, wine, or spirits nearly tripling in the last five years and increasing by over 650% over the last ten years. Employment within these three beverage manufacturing industries exceeded 2,100 workers in 2016. Most of the employment is within the brewing industry.

Montana is also diversifying into more knowledge-based industries, with computer system design services moving from less than ten employees ten years ago to over 100 now. Scientific research and development services has also increase dramatically over the last ten years, adding about 200 jobs over the last decade. Professional and technical services has been increasing by 2.6% per year over the last five years. Employment in the private education sector for computer training has also grown substantially, although this niche has less than 100 employees.

In general, Montana has high levels of entrepreneurialism, with the highest rate of business ownership among households in the nation. Kaufman has ranked Montana as among the top states in entrepreneurialism for each of the last five years. Over 50,000 Montanans work for businesses that did not exist five years ago. Montana also has the 4<sup>th</sup> highest rate of net business creation among

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<sup>3</sup> Montana Quarterly Census of Employment and Wages (QCEW). 2016. Montana Department of Labor & Industry and Bureau of Labor Statistics. Available at [lmi.mt.gov](http://lmi.mt.gov).

<sup>4</sup> Wagner, Barbara et al. 2017. "2017 Labor Day Report" by the Montana Department of Labor & Industry. Available at [lmi.mt.gov/publications](http://lmi.mt.gov/publications).

employing businesses.<sup>5</sup>

### III. EMPLOYERS' EMPLOYMENT NEEDS

As stated above, all Montana businesses are experiencing worker shortages, with entry level jobs having high recruitment needs due to high turnover, which is expected given Montana's tight labor markets. Montana's working age population is not expected to expand for the next ten years, making labor markets increasingly tight.<sup>6</sup> While tight labor markets are difficult to mitigate for employers, workers benefit from rapidly rising wages and ample opportunities for advancement.

With all areas of the state and economy in need of trained workers, the workforce training system must prioritize workforce dollars into areas where labor market frictions exist, and where the shortage of workers affects the greatest number of people. As such, the healthcare sector receives significant attention from workforce training professionals. The healthcare sector is large and growing steadily, creating a very large demand for trained workers. In addition, most health care jobs require at least one year of training, making it difficult to quickly expand supply. With the help of the HealthCARE Montana Grant, Montana has just recently hit the point where the supply of graduates trained as Registered Nurses is sufficient to fill annual job openings in Registered Nursing. However, most of the nursing supply have ASNs rather than the recommended BSNs. Further, other nursing occupations remain undersupplied, underscoring the need for continued work under the HealthCARE Montana grant to provide training and apprenticeships for nursing occupations. The Registered Apprenticeship Program 161 nursing apprenticeships, a great start to a program that was established in 2016. The HealthCARE MT grant has reached 6,754 clients within the three years of the grant.<sup>7</sup> Nurses typically need to be licensed through the state.

The knowledge required in nursing jobs include medicine and dentistry, customer and personal service, psychology, English language, therapy and counseling, public safety and security, and education and training. The skills required in many nursing jobs include active listening, social perceptiveness, service orientation, speaking, monitoring, and coordination. The abilities required in many nursing positions include oral comprehension, oral expression, near vision, speech recognition, problem sensitivity, deductive reasoning, and inductive reasoning.<sup>8</sup>

The Department has also conducted supply and demand analysis into the occupations where the college system is not producing sufficient graduates to meet the worker needs of employers'. The report found that our higher education system is not providing sufficient workers in social work, automotive service, computer and information science, and some healthcare jobs. Too many workers are graduating with a general studies degree when compared to the available jobs. More specifically, the report found that employers are not having worker needs met in the following educational programs:

- Finance
- Administrative Assistant
- Health Tech/ Assistant
- Medical Administrative Assistant
- HIT and Medical Coding
- Transportation and Material Moving
- Automotive Technology
- Mechanic Repair Tech
- Construction

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<sup>5</sup> Wagner, 2017.

<sup>6</sup> Wagner, 2017.

<sup>7</sup> Montana Annual Performance Review for HealthCARE Montana grant. 2017.

<sup>8</sup> O\*Net Online, 2017. Sponsored by the U.S. Department of Labor. Onetonline.org.

- Geography
- Social Science
- Social Work
- Public Administration
- Human Services
- Public Safety
- Physics
- Chemistry
- Legal Support
- Construction Engineering Technology
- Industrial Engineering
- Environmental Engineering
- Secondary Education
- School Counselor
- Parks & Recreation
- Personal & Culinary Services
- Computer Science
- Information Technology
- Computer/ Info Science, Other
- Public Relations
- Mass Communication
- Plant Science
- Animal Science
- Agriculture

Of these programs, computer science, information technology, computer/info science, other, secondary education, social workers, and automotive technology were those highlighted as the largest areas of worker training. These fields rely on workers graduating with specific degrees, rather than being able to fill the position with a worker in a different field. For example, finance jobs can be filled with workers graduating with degrees in business, accounting, economics, finance, or other fields. However, social work positions often require certain certifications and licensing that require on the coursework in the social work degree. In addition, these jobs were highlighted because wage and employment outcomes confirm the results of the projections analysis, helping to make the findings more robust.<sup>9</sup>

The knowledge required of computer science, information technology, and computer/info science other type jobs include computers and electronics, English language, mathematics, customer service, engineering and technology, and administration and management. The skills required for these jobs include programming, judgement and decision making, systems analysis, reading comprehension, complex problem solving, critical thinking, and active listening. The abilities of these jobs include written comprehension, problem sensitivity, information ordering, near vision, oral comprehension, inductive reasoning, and deductive reasoning.<sup>10</sup>

## B. WORKFORCE ANALYSIS

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA. \* This population must include individuals with disabilities among other groups\*\* in the State and across regions identified by the State. This includes: Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care

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<sup>9</sup> Watson et al, 2017.

<sup>10</sup> O\*Net Online, 2017.

system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals. \*\* Veterans, unemployed workers, and youth, and others that the State may identify.

## I. EMPLOYMENT AND UNEMPLOYMENT

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

We provide the following infographic to the public to promote understanding of Montana's workforce. Montana's labor force participation rate is 63.4%, with 60.7% of our population employed in 2016. The state's labor force participation rate and employment to population ratio are both higher than the national average. However, certain demographics have lower than average labor force participation, including the disabled (rate of 46.9%), veterans (49.6%), American Indians (57.2%), and women (59.3%). American Indians comprise 5% of Montana's labor force. Women comprised the majority of the employed in Montana in 2016. Those not working are most likely to be not working because they are disabled or ill, taking care of house or family, or in school.<sup>11</sup>

Veterans are an important part of the Montana workforce, with over 50,000 veterans employed. Montana has the 2<sup>nd</sup> highest rate of veterans among states, 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.

Montana has a high rate of labor force participation among older Montanans and teenagers, compared to the national average. Among those 65 to 74 years, over 27% of Montanans are in the labor force compared to only 25.5% nationally. Among the 75 and older population, 7% of Montanans are in the labor force compared to 6.3% nationally.<sup>12</sup> The higher labor force participation rate and slightly older population contribute to Montana having an older workforce than the national average. Roughly ¼ of Montana's labor force is 55 or older compared to only 21% nationally.

In fact, Montana has above average labor force participation rates at every age group except for those aged 25 to 29 years of age, where labor force participation is statistically equal with the U.S. However, labor force participation among younger workers is much higher than the nation. Those aged 16 to 19 years have a participation rate of 45.7% in Montana compared to only 37.6% nationally. Those aged 20 to 24 years have a participation rate of 78.3% in Montana compared to 74.0% nationally. The causes for significantly higher rates of labor force participation among younger workers in Montana is not clear, but likely is due to lower average household incomes, competitive wages for jobs requiring low levels of education, and a longer duration of low unemployment rates, along with cultural factors.

Roughly 1,418 individuals were homeless in Montana in 2016. Among the homeless, 165 were veterans and most were in families with children.<sup>13</sup> Labor force participation data on the homeless is not available for Montana.

Among women who have had a birth in the past 12 months, 61.5% are in the labor force in Montana, roughly equal to the U.S. rates. Labor force participation rates are the same for married and single new mothers in Montana. Women who have not given birth in the last 12 months have higher labor force

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<sup>11</sup> Wagner et al. 2017.

<sup>12</sup> 2016 American Community Survey 5-year Estimates, U.S. Census Bureau. Differences are statistically significant.

<sup>13</sup> Henry et al. 2017. U.S. Department of Housing and Urban Development, Office of Community Planning and Development. "The 2016 Annual Homeless Assessment Report to Congress" Available at <https://www.hudexchange.info/resources/documents/2016-AHAR-Part-1.pdf>.



participation at 75.8% in Montana. Among single parents of children under 18 years, women have labor force participation rates of roughly 83%, while male single parents have labor force participation of 92%.

Statistical data is not available in Montana for the following worker groups: displaced homemakers; low-income individuals; ex-offenders; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers; individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; and long-term unemployed individuals.

## The Montana Worker By the Numbers

### The Montana Labor Force



Montana Population 2016:	1,042,000
Population over 16:	840,000
Civilian, Non-Institutionalized	
Population over 16:	823,000
In the Labor Force:	522,000
Employed:	500,000
Unemployed:	22,000

**63.4%**

of Montanans over 16  
are in the labor force.

**60.7%** are employed.

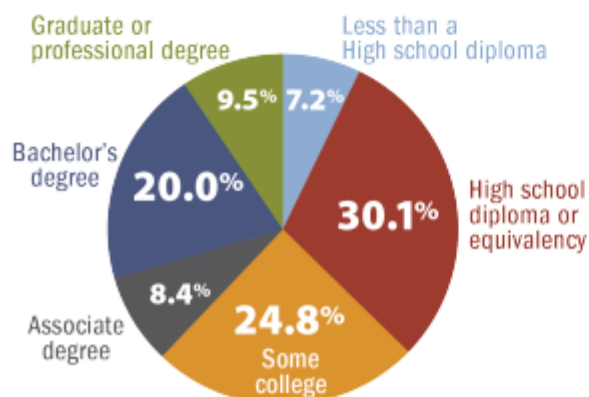
Both rates are above the national average.

The Montana Labor Force is



### Population Educational Attainment

#### Educational Attainment of Montanans 25 and Older



Montana ranks highest  
in the nation for high  
school-level education.

**93%** of Montanans  
25 and over have a  
high school diploma  
or equivalency.

Yet, the state ranks  
only 20th for bachelor's  
degree attainment.



## The Montana Worker By the Numbers

### Montana Workers by Age



### Population by Veteran Status

**11.4% of Montanans are veterans.**

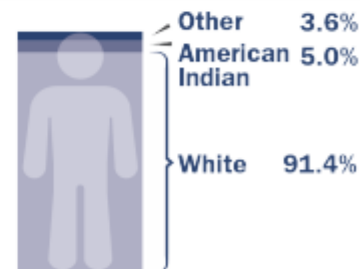


Montana has the 2nd highest proportion of veterans in the nation, but Montana veterans have lower labor force participation compared to non-veterans and veterans nationally.



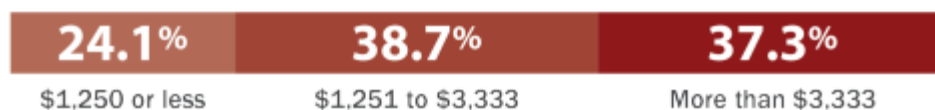
**29.6%** of Montana veterans have a disability.

### Labor Force by Race



### Employed by Earnings

Montana Workers by Monthly Earnings in Primary Job (using home location)



## II. LABOR MARKET TRENDS

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

Montana's labor market trends are all related to the worker shortage. Montana's low unemployment rates are expected to decline further as the baby boomer population retires without enough young workers to replace them. Due to a large number of retirements and the relatively small size of the

younger generation entering the workforce, Montana is expected to only add 4,500 workers per year to our labor force, which is insufficient to fill the expected job growth of 5,500 jobs per year, pushing unemployment rates to new lows.

Low unemployment rates generally increase labor force participation as new workers respond to plentiful job opportunities and higher wages by entering the labor force. These economic responses are expected to continue, particularly among prime and working-age adults aged 25 to 54. Increases in migration from other states or counties will also add workers. Yet, even with these positive influences, growth in the labor force will still be slow due to the age composition of the population. To put the change into context, Montana's labor force aged 16 to 24 is only projected to grow by about 130 people per year through 2026, while the labor force over 55 is growing by nearly 4,000 people per year.

As labor markets tighten, several other trends will materialize. First, wage growth will increase as businesses try to recruit and retain their workforce through higher compensation. The wage growth will be most rapid among low-wage, low-skill jobs because jobs at higher skill levels will still be able to recruit workers from lower rungs on the career ladder by offering career advancement. However, jobs at the low end of the career ladder simply do not have workers at lower skill levels to advance. Therefore, filling open positions can only be done through recruitment, not by growing your own workforce. For employers that can fill positions through developing their own workforce, worker training, mentoring, and scheduled advancements will likely become more common as a means of retention. Workplaces will also likely become more friendly and open to workers who require accommodations or flexible scheduling. Many employers currently regard the costs of offering flexible work environments to be greater than the benefits of recruiting these workers. However, this perspective will change as workers become harder to find.

### III. EDUCATION AND SKILL LEVELS OF THE WORKFORCE

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

The Montana workforce is well-educated compared to the nation, at least for education levels of bachelor's degrees and below. Montana has the highest rate of attainment for high school diploma or equivalency in the nation, with 93% of Montanans over 25 holding a diploma. The state ranks 20<sup>th</sup> in the nation for bachelor's degree attainment, then falls to below average for graduate or professional degree attainment.

### IV. SKILL GAPS

Describe apparent 'skill gaps'.

Montana's worker challenges are primarily in finding sufficient workers, not just specific skill gaps. As such, many of the commonly heard complaints from employers include However, as described above, structural worker shortages occur in some fields where the worker supply is insufficient to meet worker demand. Those fields are described above.

In general, Montana's job mix includes a large share of jobs that do not require post-secondary education or training. Roughly 2/3rds of Montana's jobs do not require education past high school. Although the educational requirements of Montana jobs are changing towards requiring greater education levels, this change is slow. The percentage of jobs not requiring post-secondary education is expected to decline by only 0.1% over the next ten years.

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

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

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

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

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

Montana's workforce development activities are coordinated through the following state agencies: the Montana Department of Labor and Industry (DLI), Montana Office of Public Instruction (OPI), and Montana Department of Public Health and Human Services (DPHHS). These agencies are responsible for all the core and non-core programs included in the combined state plan.

Agency	Core Program	Non-Core Program
DLI	Adult (Title I), Dislocated Worker (Title I), Youth (Title I), Wagner-Peyser (Wagner-Peyser Act, as amended by Title III), Senior Community Service Employment Program (Title V Older American Act)	Trade Adjustment Assistance for Worker Program (Chapter 2, Title II Tract Act) Jobs for Veterans State Grants (Title 38, Chapter 41) Migrant and Seasonal Farmworker Program (Title I)
OPI	Adult Education and Family Literacy (WIOA Title II)	
DPHHS	Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV) as of July 1, 2016, Temporary Assistance for Needy Families (TANF) Program (42 U.S.C.)	

The SWIB is the governing body charged with the continuous improvement of the workforce system and oversight of WIOA funds and programs. SWIB ensures that the state workforce activities are aligned with the efforts of economic development, education, workforce development, government, and business stakeholders at the local and state levels. This

multifaceted alignment of public and private stakeholders creates a workforce system that is demand-driven, flexible and responsive to the needs of Montanans.

Montana is a single workforce area. The SWIB strategically directs the workforce activities at the community level and providing local guidance for implementation of workforce programs. With local guidance, workforce activities are often customized to fit the needs of individual customers -both businesses and jobseekers alike. The partnerships and atmosphere of collaboration guided by the state agencies and SWIB funnel the fully integrated workforce system of not only core and non-core program partners, but community stakeholders that facilitate a system design to provide impactful services and activities throughout the state.

The Montana Workforce Centers are at the forefront of the workforce activities, and represent Montana's version of the American Jobs Center. There are 16 workforce centers spread across the state providing access to services. The Montana Workforce Centers are overseen at the state level by the SWIB, and are managed locally by the one-stop operator.

The SWIB is tasked with procuring a one-stop operator for the daily operation of the centers in accordance with WIOA 121(d). The SWIB carries out workforce activities by partnering locally through Memorandums of Understanding (MOU) to implement core, non-core, and other partner programs. Montana Workforce Centers are fully integrated with WIOA, Wagner-Peyser, Jobs for Veterans State Grant (JVSG), and Trade Adjustment Assistance (TAA); local partnerships and integration also exist in many areas with TANF, Adult Education and Family Literacy, Vocational Rehabilitation, and others.

Typical customers entering the center are engaged by an intake process that is designed to identify the needs of the individual by gathering information and then utilizing the appropriate resources for those needs. In some cases, the resources are initiated by a referral to a partner program. Customers are given solutions and next steps to their questions, barriers, and issues by connecting directly with the appropriate workforce system partner as part of this philosophy. Because Montana Workforce Centers are fully integrated and operate in close partnership with other workforce agencies, co-enrollment in multiple programs is commonplace. Co-enrollment provides the customer with the ideal service plan while allowing the system to utilize its resources in an efficient manner.

Communication is vital to coordinate and align workforce services statewide. This communication starts with the SWIB which has representation from the DLI, OPI, DPHHS, and Montana Department of Higher Education, which encompasses all the core, non-core, and partner programs providing workforce activities in the state.

MWorks is the case management, data collection, and reporting system utilized by all of the Workforce Centers. The system provides the ability for Workforce Centers and their partners to track all WIOA, TAA, Veteran, Wagner-Peyser, state programs, plus discretionary grants in one common database. All reports generated from this system are "up to the minute," thus allowing for better management of day-to-day activity and performance. Along with the federally-mandated reports, Montana has developed a variety of locally-requested reports that allow staff to track their caseloads, correct data entry errors, and analyze performance at the state, local, and case manager level. In addition, the system is agile enough to allow the as-needed addition of reports, and program and service codes that will track new statewide initiatives supporting the state's workforce strategies. Workforce partners may make use of this system through data sharing agreements with the state or the local workforce regions.

Montana Workforce Centers offer the full array of Career Services outlined in WIOA 134(c)(2) for unemployed and underemployed jobseekers.

<b>Montana Workforce Center Services</b>	
<b>Basic Career Services</b>	Determination of Eligibility Initial assessment, Labor Exchange Information, Labor Market Information, Unemployment Insurance

	Information, FAFSA Assistance Referral, Financial Literacy Referral
<b>Individualized Career Services</b>	Development of Individual Employment Plan, Group Counseling, Individual Counseling, Comprehensive and Specialized Assessments, Career Planning, Short-Term Pre-Vocational Services (soft skills such as communication, punctuality, and personal maintenance skills), Workforce Preparation Activities
<b>Follow-Up Career Services</b>	12 months of follow-up

Career services available at the centers vary because of local area inflexion and needs of particular communities. Basic career services are available at all locations throughout Montana. Each center has computers, printers and copiers, printed resources, and staff to assist jobseekers.

Many of the services, including MWorks and Montana Career Information System (MCIS), can be accessed virtually though the internet via computer, smart phone, or tablet. MWorks is the state job matching system and is the virtual one-stop-shop where Montanans can centralize all their career search activities. It allows jobseekers to self-enter his/her resume(s) and job search 24/7. MCIS also provides access to a tool box of job search assistance links that has been customized for each workforce area. Links include direct access to the area's web page, career exploration, training resources, self-marketing tools, and additional job banks. MCIS allows jobseekers to make informed data-driven career decisions. This labor market system provides a wide variety of regional labor market services, such as labor trends, statistics, economic, demographic, salary, and employer data. It allows jobseekers to set up a personal page for their career exploration data to be readily accessible.

Basic Career services also extend beyond the virtual world. After the initial assessment, clients—as appropriate—may be provided with direct linkages to additional workforce activities, including multiple education and training opportunities, across the workforce system though partner referrals. Some of these partners are housed within the workforce center, making clients unaware that they are participating in multiple programs due to the integrated service delivery.

Individualized career services within the Montana Workforce Centers vary across the state, but all the offices offer a full line of activities to prepare jobseekers for the modern workforce. They address many of the soft skill and technical skill training Montana employers require such as: Complex Problem; Solving; Writing; Critical Thinking; Judgment and Decision Making; Deductive Reasoning; Information Ordering; Coordination; Interacting With Computers, and Analyzing Data or Information.

Service providers work with employers to identify these needs and systematically create programs to provide the education and training needed. These types of services begin with the development of an individual employment plan to address the unique requirements of each customer. Professional staff in the workforce system work with the customer to create and implement their plan. Staff provide the customer with labor market information including in-demand occupations, wage data, and employer requirements. The plan may include activities such as:

- Workshops - Job Search, Application, Resume Writing, Interviewing, Financial Literacy, etc.;
- Short-Term Pre-Vocational Services - Career Readiness that includes soft skill training;
- Career Exploration Inventories - MCIS; and
- Comprehensive Assessments - MCIS, eSkill, Test of Adult Basic Education, etc.

Career services are not always enough to enable job seekers to obtain self-sufficient employment. In some instances, formal training is required. Colorado Workforce Centers offer multiple trainings services such as: Occupational skills training; On-the job training (OJT); Apprenticeships; Incumbent worker training; Skill upgrading and retaining; Entrepreneurial training, and Adult education and family literacy activities.

Training services are funded through WIOA programs, Pell Grants, partner programs, and state and local grants. The SWIB is responsible for establishing and implementing local policies for eligibility,

Individual Training Account (ITA) limits, and the identification of in-demand sectors or occupations. Through multiple initiatives and projects, Montana has focused training and career development activities on sector strategies/partnerships and career pathway development.

To assist job seekers in obtaining or retaining employment through career or training services, Montana Workforce Centers offer a variety of supportive services. The SWIB is responsible for establishing supportive service policy that outlines types, eligibility, limits, etc. Examples of supportive services include transportation, needs-related payments, tools and equipment, uniforms, and other clothing. In addition to WIOA-funded supportive services, service providers have developed relationships with community partners that assist with utility payments, food, shelter, and other basic needs.

The focal point of all workforce system activities is business and industry. The workforce system created a statewide Business Service Committee consisting of eight members across the state. The team established core services to present to employers. These activities are taking place statewide and include:

- **Business Expansion and Retention Program (BEAR)** – Information on or referral to BEAR or attended BEAR meeting.
- **Business Start-Up Entrepreneur** – Business start-up information and resources
- **Community Group Presentation** – General presentation
- **Economic Development** – Economic development activities and outreach
- **Employer Information** – Education about the range of services available through the One-Stop System
- **Employment Law** – Employment and labor law information and resources
- **Financial Assistance** – Information about financial resources, tax credits, state and federal incentives, Federal Bonding Program, WOTC
- **Human Resources** – Consulted on human resource services and topics
- **Incumbent Worker Training** – Explain IWT program and eligibility
- **Labor Market Information** – LMI for business, sector, industry or cluster referred to MCIS
- **Layoff Aversion** – Explain layoff aversion strategies
- **Outreach** – Outreach to business regarding youth, veterans, individuals with disabilities, older workers, ex-offenders, partnerships with high schools or other education programs to improve skill levels
- **Posters** – Explain labor law poster requirements
- **Rapid Response** – Rapid Response activities including planning layoff response
- **Recruitment** – Support business search for qualified applicants, secure information on job requirements, pre-employment testing, providing employers with a space for interviewing or screening, job analysis services
- **Recruitment Events** – Organizing, conducting, and or participation in job fairs
- **Retention** – Strategies for retaining employees and minimizing employee turnover
- **Training** – presentations for specific needs of a business or information about training grants and resources
- **Work Based Learning** – Apprenticeship, OJT, WEX and internship information

This collaboration statewide is reinforced at the annual Business Service Summit where Business Services Representatives from across the state work to ensure activities and strategies align system wide.

Montana has three Job Corps locations. Job Corps is a federally-funded program under WIOA that provides free education and training to young adults (16-24 years old). Eligible youth can earn a high school diploma or high school equivalency diploma and receive life, soft, and occupation skills training. The Job Corps partnership with Montana's workforce system is statewide and comprehensive. Job Corps regularly participates in local youth job and career fairs. The strong relationship between the Montana Workforce Centers and Job Corps is solidified by MOUs to provide Job Corps and their contracted vendor with access to MWorks. JobCorps youth register with MWorks to search for jobs once they have completed their coursework and are transitioning back to the community. They benefit by posting a résumé, applying for a specific job, or completing a self-



directed job search. A formalized process for referring Job Corps clients to local WIOA youth programs is in place with each workforce center and provides youth with access to more career services that they may need to meet their educational and employment goals.

YouthBuild is an education, career-training, and leadership program for young adults without a high school diploma or equivalent. The program provides skill building and preparation for clients to obtain their diploma while simultaneously providing work and learn programming in a variety of in-demand occupations. Students are exposed to soft skill training throughout the program and build the foundational career skills needed to succeed in the modern workplace. Upon completion of the program, students are assisted with career or post-secondary education placement and receive 12 months of follow-up services. With one active grantee in Montana, YouthBuild program information and referrals are available through the workforce centers nearest the grantee.

DLI administers the Migrant and Seasonal Farm Workers Program (MSFW), ensures that program information is available at all workforce centers, and that eligible clients receive proper referrals. Each workforce center administers an outreach program to ensure that equitable services are provided to all MSFW clientele, including:

- Job search assistance and placement registration assistance
- Assistance with Unemployment Insurance
- Testing
- Counseling
- Training opportunities
- Referral to supportive services
- Job development
- Referrals to other organizations that serve migrant and seasonal farm workers
- Complaint resolution, and
- Farm worker rights and labor law information

MSFW programs coordinate with Montana Workforce Centers and many times customers are co-enrolled, which allows them to access the full array of workforce system programs.

Montana's Temporary Assistance for Needy Families (TANF) is known as Pathways and is administered at the state level by the Montana Department of Public Health and Human Services (DPHHS), and is locally administered by a combination of workforce centers and non-profit organizations. All applicants for Pathways are given an assessment within 30 days of application that focuses on identifying what services and assistance will best support the family in achieving economic stability. Often times, these assessments lead to referral(s) to WIOA and other workforce partner services as a priority population. In many counties, workforce development activities associated with Pathways are administered through the workforce center via a local level agreement or contract for services. Clients may engage in a variety of employment-oriented activities through the Pathways program, including:

- English Language Acquisition
- Adult Education and Family Literacy
- Post-secondary and Vocational Education
- Work Experience/Internships
- Community Service
- WIOA - Funded Programs
- Job Readiness Training
- Employment

Office of Public Instruction (OPI) administers the federally-funded Adult Education and Family Literacy Act (AEFLA) grant program under Title II of WIOA, as well as the state-funded Adult Education and Literacy Act of 2014 grant program. OPI provides oversight for programs across the state, and services are provided locally by sub-grant recipients. As a combined plan core partner, and consistent with the focus of WIOA, adult education and family literacy services are essential to the workforce system. In many cases, meeting adult education and family literacy needs is the first step in a job



seeker's career pathway. Adult education and family literacy services include adult basic and secondary education and English language acquisition focused on career pathways and family literacy to promote stronger educational advancement of children, helping break cycles of poverty, and building stronger local areas within Montana.

Senior Community Service Employment Program (SCSEP) is administered by DLI. SCSEP promotes useful, part-time employment opportunities in community service activities for persons with low incomes who are 55 years of age or older and have multiple barriers to employment. Priority is given to individuals who are: veterans, age 65 plus, live with a disability, have limited English proficiency and/or low literacy skills. The program is designed to foster individual economic self-sufficiency and increase the number of people in unsubsidized employment. SCSEP clients are placed in non-profit or government agencies called, "Host Agencies." Host agencies agree to provide employment training through community service activities, upgrading the clients' employability skills. Clients are provided minimum wage, skill enhancement or acquisition of skills, personal and employment counseling, and assistance in obtaining un-subsidized employment.

Vocational Rehabilitation Programs fall under the authority of DPHHS through the Vocational Rehabilitation and Blind and Low Vision Services Division (VRBS). The VRBS mission is to assist persons with disabilities to succeed at work and to live independently. VRBS accomplishes this mission with a variety of employment and training activities including:

- Evaluation and diagnostic services provided to determine eligibility and the services needed for the individual to become employed;
- Vocational rehabilitation counseling and guidance provided directly by a vocational rehabilitation counselor during the individual's plan of services;
- Physical and mental restoration services which may be provided to correct or substantially modify an individual's physical or mental condition;
- Training services, when necessary to become employed, including vocational training, academic training, personal and vocational adjustment training, job coaching, on-the-job training, job-seeking skills training, and books, tools, and other training materials;
- Specialized services for individuals who are blind, deaf, and deaf-blind, including interpreter services, note-taking services, and reader services;
- Rehabilitation technology services, including assistive technology devices, assistive technology services, and rehabilitation engineering services to address barriers encountered by an individual in attaining or retaining employment;
- Placement services provided to assist an individual with a disability to find adequate and suitable employment in his/her chosen career; and
- Supportive services, such as maintenance, transportation, personal assistance services, and services to family members may also be provided if necessary for the individual to utilize the services identified above.
- Post-employment services may be provided to previously rehabilitated individuals when needed to maintain or regain suitable employment.
- Pre-employment transition services provided to students with disabilities, including: job exploration and counseling, work-based learning experiences, counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education, workplace readiness training to develop social skills and independent living, and instruction in self-advocacy.
- Technical assistance, training, outreach and other supportive services provided to public and private employers of all sizes, including Federal and Federal contracting employers for the purpose of increasing employment opportunities for job seekers with disabilities.

Trade Adjustment Assistance is overseen by DLI and is part of the integrated services team in the Montana Workforce Centers. TAA provides enhanced reemployment benefits designed to help workers adversely affected by foreign trade obtain suitable employment. Benefits include occupational training, job search and relocation allowances, Reemployment Trade Adjustment Assistance (RTAA), reemployment case management services, Trade Readjustment Allowance (TRA), and extended unemployment insurance benefits. TAA customers are co-enrolled into Title I-B programs and are referred to other workforce system activities as needed.

Jobs for Veterans State Grant (JVSG) programs are administered by DLI, and are co-located and fully integrated within the Montana Workforce Centers. JVSG funds six positions: Disabled Veterans Outreach Specialist (DVOP) a Veteran Intensive Service Coordinator. Customers entering the career center are screened for eligibility and referred to JVSG staff as appropriate. In most cases, JVSG clients are co-enrolled in Title I-B programs. DVOPs are charged with providing case management and 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: 1) 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, 2) 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. 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 Workforce Centers.

Unemployment Insurance Division (UI) programs are operated by DLI and work Montana Workforce Center staff. UI provides benefits to qualified dislocated workers to assist them with their financial needs during their work search. UI staff have partnered with system leaders to cross train workforce staff on the UI benefits systems, which allows for better distribution of information to jobseekers. In addition, UI operates the Reemployment Services and Eligibility Assessment (RESEA) and Links to Reemployment which focuses on engaging UI claimants within the first 5 weeks of their first UI Benefit payment by getting them physically into the workforce centers. This proactive strategy provides earlier workforce engagement and increased services to help expedite workforce reentry.

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

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

Montana's workforce system has many strengths. Montana is transforming its workforce system into a business and industry driven model. The services and activities to unemployed, underemployed, and businesses outlined above are designed with the intent to meet local and statewide industry demands. Through initiatives including sector partnerships, career pathway development, data analysis, system collaboration, and work and learn programing, the workforce system is embracing the key principles of WIOA. Montana has aligned business services though the statewide business services team and maintained a customer-centric approach for both jobseekers and businesses. The vital element to this success is the understanding that workforce development is truly a multi-faceted approach harnessing workforce, education, economic development, and business. Examples of statewide and local collaboration among partners exist throughout Montana. Alignment of resources and locally-specific co-location of services have allowed Montana to have a flexible and proactive approach to workforce development by being able to create programs from the bottom up.

Throughout Montana there are numerous examples of best practices that are shared through partnerships. Examples include:

- Partnerships with K-12 education to assist schools with career exploration and providing information to the next generation of the workforce, enabling them to make educated and informed career decisions based on data and workforce demand;
- Creating the platform of a data sharing warehouse;
- Creating a demand-driven workforce system matching Montana's talent pool to upcoming needs of businesses; and
- Establishing Healthcare IT industry apprenticeship programs.

There is room for improvement in all things and the workforce system in Montana is no different. Through stakeholder engagement, opportunities for enhancement were identified. These opportunities provide a platform for future initiatives and strategies. Opportunities include:

- Data Sharing – the data sharing warehouse that has been created is ready for partners to build into it however, this is yet to take place.
- Professional Development - Workforce system staff need continuous professional development to be educated on current market conditions, as well as the latest initiatives and strategies. In addition, cross agency staff training would allow for increased knowledge of partner programs, creating a more holistic system.
- Consistency in Service Delivery -There are opportunities to establish more consistency around elements of the service delivery strategies, so customers can more easily navigate services within the system.

### C. STATE WORKFORCE DEVELOPMENT CAPACITY

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

To ensure workforce system effectiveness, Montana has organized a State Agency Management (SAM) Team for Workforce Development. Meetings are held on a quarterly. SAM Team meetings are facilitated and agenda-based. Required team members include lead state agency officials representing WIOA core programs from: DLI (WIOA and Wagner-Peyser), Office of Public Instruction (Adult Basic Education), and the Department of Public Health and Human Services (Vocational Rehabilitation and TANF). Additional membership includes representatives from all state agencies involved in the administration of workforce development programs, including – but not limited to – the Department of Commerce, the Office of the Commissioner of Higher Education, and the Governor's Office of Economic Development.

Team members are expected to share information regarding workforce development programs and efforts within their agencies. Other expectations are that team members will: support Job Service offices and the One-Stop certification process; act as an advisory group to each member's SWIB representative; act as advisors to each other's workforce development-related programs to ensure that efforts are coordinated and not conflicting; and coordinate economic development strategies with the Office of the Governor and other state agencies. The SAM Team is working to develop a Continuous Improvement Plan (CIP) for measuring and evaluating the success and effectiveness of the workforce system across the state. This CIP is presented to the SWIB annually for review and approval. In addition, requests for data and statistics relevant to the workforce system partner programs are made available to the SWIB by the SAM Team and an annual update is provided to the SWIB regarding system measurements under the CIP. DLI, in cooperation with the SWIB and other WIOA partners, use information gleaned from the business engagement described above, in conjunction with labor market data and trends, to define and develop a list of targeted and demand occupations that are used as the basis for determining client training, employment planning and career development. This list of occupations is updated annually.

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## B. STATE STRATEGIC VISION AND GOALS

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

## 1. VISION

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

Montana's vision for its workforce system is one in which workforce development occurs via innovation through partner collaboration, integrated service delivery, data analysis and ongoing evaluation and improvement. Vocational Rehabilitation and Blind Services (VRBS) and Adult Basic Education (ABE) will align with other workforce programs. And partners will better understand industry training needs in the state's local economies and will increase promotion of training services available to businesses through Job Service offices including Incumbent Worker Training, Apprenticeship, OJT and soft skills training.

## 2. GOALS

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

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

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

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

Montana's workforce system goals include: Continuing to tap what have historically been considered non-traditional labor pools; Streamlining duties of local service providers to allow holistic focus on the goals of WIOA; Devising an business engagement strategy that includes all partners including local workforce organizations that operate outside the State's Workforce Development System; Understanding customer needs and expectations and acknowledging that while employment is the goal, our value to customers cannot always and only be measured in those terms; Ensuring that career planning is a central piece of our integrated service delivery model; Automating ongoing customer intake to better evaluate customer data and help drive more effective and consistent service delivery; Performing better data analysis to evaluate customer needs and system efforts, set better expectations, and increase overall situational understanding; Gain better understanding of local workforce needs and initiatives through local workforce organizations that operate outside the State's Workforce Development System; and Help direct resources to local workforce initiatives and organizations that are business focused and collaborative which operate the State's Workforce Development System.

Montana's workforce system will generally achieve these goals by engaging with and empowering: The State Workforce Innovation Board which brings together private businesses and workforce service and education & training providers; State government leadership; A State Agency Management team made up of state agency core program managers and other workforce partners; Local partner management teams that include Community Management Teams, Job Service Employer Committees, Business Expansion And Retention committees, Chambers of Commerce, Economic Development Corporations, Small Business Development Councils, Tribal Councils, and Local one stop delivery teams that ensure service delivery staff are properly trained, adequately equipped, and able to effectively engage customers to provide proper and just-in-time workforce solutions; and Local workforce organizations that operate outside the State's Workforce Development System through cooperative agreements or a memorandum of understanding (MOU).

### 3. PERFORMANCE GOALS

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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.)

Please see Appendix 1.

#### 4. ASSESSMENT

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

To ensure workforce system effectiveness, Montana will organize a State Agency Management (SAM) Team for Workforce Development. Meetings will be held on a quarterly basis, or more frequently if needed. SAM Team meetings will be facilitated and agenda-based. Required team members will include lead state agency officials representing WIOA core programs from: DLI (WIOA and Wagner-Peyser), Office of Public Instruction (Adult Basic Education), and the Department of Public Health and Human Services (Vocational Rehabilitation and TANF). Additional membership will include representatives from all state agencies involved in the administration of workforce development programs, including – but not limited to – the Department of Commerce, the Office of the Commissioner of Higher Education, and the Governor's Office of Economic Development. Additional members will be invited to join the team as necessary and relevant. Team members will be expected to share information regarding workforce development programs and efforts within their agencies. Other expectations are that team members will: support Job Service offices and the One-Stop certification process; act as an advisory group to each member's SWIB representative; act as advisors to each other's workforce development-related programs to ensure that efforts are coordinated and not conflicting; and coordinate economic development strategies with the Office of the Governor and other state agencies. The SAM Team will develop a Continuous Improvement Plan (CIP) for measuring and evaluating the success and effectiveness of the workforce system across the state. This CIP will be presented to the SWIB annually for review and approval. In addition, requests for data and statistics relevant to the workforce system partner programs will be made available to the SWIB by the SAM Team and an annual update will be provided to the SWIB regarding system measurements under the CIP.



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## C. STATE STRATEGY

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

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

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The mission of the Montana State Workforce Innovation Board (SWIB) is to advise the Governor on statewide workforce development strategies that maximize the state's education, training and business 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. The SWIB will accomplish this through the following actions: Making policy recommendations for 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; and Ensuring a quality workforce system by evaluating results and supporting high standards and continuous improvement. The State will look to organizations outside its Workforce Development System for opportunities to support local, business engaged, innovative workforce programs.

The SWIB is primarily comprised of business leaders in the State of Montana, who are stakeholders in attaining quality outcomes for workforce and economic development initiatives. These private industry representatives, along with public and workforce representatives, play a vital role in ensuring that businesses have access to a prepared workforce and that job seekers can access services, resources, and training that will enable them to obtain employment. The standing committees of the State Workforce Innovation Board include: The Executive Committee, WIOA Committee, Recruitment and Retention Committee and the Education and Training Committee. These committees conduct business 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.

To address sector strategies, DLI, in cooperation with the SWIB and other WIOA partner's, will use information gleaned from the business engagement described above, in conjunction with labor market data and trends to define and develop a list of targeted and demand occupations that will be used as the basis for determining client training, employment planning and career development. This list of occupations will be updated annually.

2. DESCRIBE THE STRATEGIES THE STATE WILL USE TO ALIGN THE CORE PROGRAMS, ANY COMBINED STATE PLAN PARTNER PROGRAMS INCLUDED IN THIS PLAN, REQUIRED AND OPTIONAL ONE-STOP PARTNER PROGRAMS, AND

ANY OTHER RESOURCES AVAILABLE TO THE STATE TO ACHIEVE FULLY INTEGRATED CUSTOMER SERVICES CONSISTENT WITH THE STRATEGIC VISION AND GOALS DESCRIBED ABOVE. ALSO DESCRIBE STRATEGIES TO STRENGTHEN WORKFORCE DEVELOPMENT ACTIVITIES IN REGARD TO WEAKNESSES IDENTIFIED IN SECTION II(A)(2).

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As implementation of WIOA continues, Montana's core partners will continue to strengthen relationships that benefit mutual customers, identify customers (across programs) whose skills sets match businesses' workforce needs, and align resources to promote efficiency and economy of scale. Montana's Job Service offices, community based organizations, Adult Basic Education (ABE), and Vocational Rehabilitation and Blind Services (VRBS) will align services and work together to serve businesses. Given its small population, Montana's federal formula funding levels are limited. The state has sought – and received – a number of discretionary and competitive grants that permit partners to expand services and promote alignment. One example is the Health CARE Montana TAACCCT grant. Montana was awarded \$14.9 million to create access to health care training in rural areas. Three full-time positions were established within the state's Registered Apprenticeship program to develop and expand health care apprenticeship training. Montana's first Certified Nursing Assistant (CNA) apprenticeship program was established in the fall of 2015; efforts are currently underway to develop apprenticeship programs for the phlebotomy and pharmacy technician occupations. The TAACCCT grant supports infrastructure and curriculum development at the community colleges, as well as allowing increased career pathway opportunities and attainment of credentials and certificates.

The Temporary Assistance for Needy Families (TANF) and Supplemental Nutrition Assistance Program (SNAP) also partner with the workforce system at the state and local levels and work together to promote integrated services for mutual customers. The core partners, along with TANF, SNAP, Career and Technical Education, Economic Development, Job Corps and other youth programs and various statewide and targeted community programs have developed an asset matrix. This document informs all partners of their respective customer bases, fund sources and performance metrics. The matrix serves as an important first step for partners to examine program gaps, overlaps and opportunities for further alignment. Additionally, partners serve on Community Management Teams (CMTs) that have been established for each one stop system. The role of CMTs is discussed further later in the plan. Continuing the focus on coordination among partners enhances services to individuals by reducing duplication and promoting integrated service strategies for individual customers. All partners – and their customers – benefit from aligning and leveraging services whenever possible. An example of the value of service alignment is the strong partnership of VRBS and DLI. These partners work closely together to ensure that VRBS customers whose disabilities are less severe and do not meet the VR Order of Selection receive individualized workforce services at Job Service offices or community based organizations that support their employment goals. Partners are also working together to strengthen the coordination of services to business customers. The Job Service often takes the lead and partners educate businesses on the value of hiring diverse populations and discuss work-based opportunities, including Registered Apprenticeship and on-the-job training. Additionally, DLI works closely with the Governor's Office of Economic Development, the Montana Department of Commerce and the Montana Economic Developers Association to provide the Business Expansion and Retention (BEAR) program available statewide. The BEAR program is operated by the Economic Developers Association and is supported by local community partners that provide resources and expertise for businesses to improve their operations and profitability. Upon request, businesses may receive assessments and technical assistance to help them sustain and expand their companies.

The Job Service's Business Services Program performance is enhanced, through stronger

awareness by staff of the need for outreach businesses, staff training, development of tools and resources, and enhancement of the database used to record services to business customers.

Alignment with Education Montana partners have several initiatives that involve educational institutions, both secondary and post-secondary, as described below.

**Big Sky Pathways** – Office of Public Instruction specialists and post-secondary staff from across the state that work with industries and secondary and post-secondary educational partners to increase student, parent and community awareness of career opportunities aligned with local and regional employment needs. The strategy involves community and school events, targeted school advising and professional development opportunities.

**Adult Pathways** – Adult Pathways is a strategy designed to prepare adult students for success by assisting them to acquire the academic and career information they need to gain access to a career pathway or to pursue post-secondary education. An adult pathway consists of activities to overcome workforce barriers by bringing together industries, community services, government agencies, post-secondary education to identify, enroll and prepare career-limited adults for high-demand career opportunities. Since Spring 2015, the Big Sky Pathways coordinators and Adult Basic Education (ABE) directors have been meeting together to coordinate smooth customer transitions from ABE to post-secondary training. In addition, the Carl Perkins Program Manager and ABE Director co-chair the Moving Pathways Career Pathways Forward Interagency State Team Project. When the request for proposals for ABE providers is released in 2017, all post-secondary institutions will be encouraged to apply.

**Dual Enrollment** – High school students can enroll in college courses that may count for both high school and college credits. Dual enrollment courses are offered at 50% off regular rates at Montana's colleges, and mandatory fees are waived. In some cases, the courses are free for high school students.

**Carl Perkins** – Through the resources available through Perkins, in addition to the state and local funding for career and technical education leveraged through the federal funds, the state is updating career and technical education services and providing more options for students wishing to pursue post-secondary studies. At the post-secondary level, career and technical education (CTE) programs help young adults preparing for first-time careers and adults who are changing careers or upskilling within a career field to quickly gain the skills and experience directly related to workplace success. Effective CTE programs at the two-year post-secondary institutions are characterized by their close relationship with businesses and smooth transitions of program clients into the workforce at higher levels of income and employment success.

**Montana's Efforts to Enhance Job Seekers' Ability to Attain Post-Secondary Credentials** Montana has several initiatives in place to promote attainment of post-secondary credentials, as described below.

**Complete College Montana** is a statewide initiative that focuses on increasing the number of Montanans who earn college degrees and certificates. The initiative is focused on increasing the percentage of the population with a college credential from 40% to 60%. This will require colleges and universities in the state to increase their annual production of degrees and certificates. As a member of Complete College America, the initiative has a common set of progress and outcome metrics and a dashboard to compare states and campuses. Other goals of Complete College Montana include implementing new funding models (tying college funding to outcomes); reducing the time to attaining a degree, creating incentives for full-time enrollment and utilizing incentive-based financial aid; transforming remediation by clarifying what constitutes college readiness and establishing a statewide approach; and restructuring academic delivery to meet the needs of today's students, including year-round attendance models.

**Prior Learning Assessment** is a tool for the Montana University System to increase access and promote college completion in a shortened timeframe for new and returning adult learners.

**HealthCARE Montana** discretionary grant is a multi-partner initiative that is strengthening the two-year college system in the health care fields by improving training opportunities and developing relevant curriculum in the field and promoting successful health care employment for students, with attention to adult learners (especially in rural areas) and to veterans.

Alignment of Education, Workforce and Economic Development Montana is committed to supporting efficient, effective and responsive delivery of educational programs that are designed to meet the needs of businesses. Several models are already in place; future plans to promote success through alignment include: Developing and implementing a statewide policy framework to align programs serving the needs of training providers, educational institutions and businesses; Supporting the

Montana University System's efforts to win federal and private grants aimed at enhancing coordination between businesses and the educational system; Providing a continuum of training and credential opportunities that promote career advancement; and Meeting local and unique training needs of high-demand industries, including health care, energy and technology. The State will look to organizations outside its Workforce Development System for opportunities to support local, business engaged, innovative workforce programs. The state also seeks to promote community colleges, two-year colleges and tribal colleges as essential local and regional suppliers of Montana's trained workforce. This will be accomplished through increasing the involvement of businesses in formal curriculum development and supporting continued expansion of comprehensive two-year education, with a focus on workforce development, access and academic progression. Job Service staff throughout the state are closely aligned with economic development entities through a variety of shared initiatives, promotion of new businesses and encouragement of entrepreneurship in industries that support existing businesses. An important example of this work is the alignment of the Governor's Office of Economic Development, Montana Department of Commerce, Montana Economic Developers Association and DLI to provide a statewide Business Expansion and Retention program. The program involves volunteer community assessment teams that address the needs of local businesses, upon request.

To address Montana's current weakness in data sharing the state will continue to work to find resources to help enable our partner programs that are not currently built into system become a user and contributor to the data warehouse platform that has been established by DLI.

Montana is a vast state that is no exception to shrinking budgets. Professional Development is often one of the first items to be reduced when resources are thin. Montana is committed to workforce system staff needing continuous professional development to be educated on current market conditions, as well as the latest initiatives and strategies. In today's world, Professional Development needs to be provided and delivered in new ways. The state is continually improving its capacity to give and receive training through recorded, virtual, or live Skype platforms.

As Montana strives to deliver services that are relevant and tailored to their local communities, it has shown to also cause a lack in consistency in service delivery across the state. Montana recognizes that there are opportunities to establish more consistency around elements of the service delivery strategies, so customers can more easily navigate services within the system.

### III. OPERATIONAL PLANNING ELEMENTS

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

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## A. STATE STRATEGY IMPLEMENTATION

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The Unified or Combined State Plan must include—

## 1. STATE BOARD FUNCTIONS

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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 the Montana 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. Committees include the executive committee and the WIOA committee, which works on policy and WIOA implementation in Montana. In addition, the board will convene ad hoc committee to work on topic-specific issue recommendations from the Governor and established priorities of the SWIB. The board conducts at minimum 2 in-person meetings per year, typically taking place in the fall and spring. Additional meetings may be convened as deemed appropriate by the chair in consultation with the Director of the SWIB and the Commissioner of Labor and Industry to address special issues. Committee and task force meetings makes use of electronic communication. Meeting notes are posted on the State Workforce Innovation Board website ([swib.mt.gov](http://swib.mt.gov)).

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

- Making policy recommendations for 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
- The State will look to 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:

- Reconfiguration of SWIB's standing committees to better carry out its duties and responsibilities. The new subcommittees are as follows:
  - 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.
  - 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.

## 2. IMPLEMENTATION OF STATE STRATEGY

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

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

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

The Research and Analysis Bureau of the 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 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. State Program and State Board Oversight As noted earlier, the State Workforce Innovation Board (SWIB) provides active support for the Governor's and key state agencies' goals and initiatives. The SWIB membership roster is included in Appendix 2. SWIB Staff Involvement in the Workforce System, the SWIB Director and staff are employed within the Montana Department of Labor and Industry (DLI), through a Memorandum of Understanding.

Organizationally, they are part of the Workforce Initiatives Section in the DLI Workforce Services Division. SWIB staff: provide administrative activities for the board; consult with business, educational institutions and related entities to facilitate workforce development opportunities; disseminate information regarding program efforts; perform research and analysis of new education and training initiatives; and build support and cooperation for program initiatives. The State Workforce Plan was thoroughly vetted before submission. The SWIB solicited input and suggestions from State Board members, appropriate state agency personnel, including the following partners, as well as members of the public and other interested parties.

DLI's Workforce Services Division  
Department of Public Health and Human Services  
Department of Commerce  
Governor's Office  
Office of Public Instruction

SWIB members attended state plan development meetings with agency partners, as well as formally reviewed draft pieces of the plan throughout the development and writing processes. The plan, both sections and in its entirety, was featured on several SWIB meeting agendas. The SWIB acted to formally approve the Montana Combined State Workforce Plan on February 23, 2016. The 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 Farmworker  
Senior Community Services Employment Program  
Foreign Labor Certification  
Federal Bonding  
National Emergency Grants Montana's  
State Incumbent Worker Program  
Jobs for Montana's Graduates Labor Market Information

The Job Service Operations Bureau along with community-based organizations coordinate and guide 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. Vocational Rehabilitation (VR) programs fall under the direction of the Montana Department of Public Health and Human Services (DPHHS). This agency is represented on the SWIB and on the SWIB's AOC Committee. In addition to service to the SWIB, DPHHS is also a signatory partner of the state One-Stop Delivery System's Memorandum of Understanding and Consortium Agreement, whereby the parties agree to support all Job Service offices in Montana. In addition to supporting the efforts of the Job Service offices, a member of the SWIB is also designated to serve on the State Board Vocational Rehabilitation Advisory Council to ensure systemic alignment of shared priorities. VR provides training to their partners on their services, in addition to actively sharing their expertise to ensure all customers are served effectively – including veterans, customers with disabilities and Montana's American Indian population. Adult Basic Education (ABE) programs fall under the direction of the Montana Office of Public Instruction. This agency is represented on the SWIB and on the SWIB's AOC Committee. In addition to service 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 all Job Service offices in Montana. Additionally, ABE coordinates the Interagency Career Pathways group. Members of this group include, but are not limited to, representatives from various workforce partners such as ABE, DPHHS, DLI, SWIB staff, the Governor's Office and the Montana University System.

## B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

Describe how the activities identified in (A) will be aligned with programs and activities provided by required one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.

The SWIB serves as the convener of all partner agencies that compose the Workforce System in Montana. Regardless of a program's status regarding this combined plan, all entities are invited to strategic conversation on implementation through the WIOA Committee as well as through the SWIB meetings. Specific initiatives are in place to support partnerships and career pathways. The events and committee meetings are open to all interested parties.

As the activities detailed above are implemented, all partners are invited to the table and efforts are coordinated with existing initiatives and meeting schedules to ensure that a fair opportunity has been created for the involvement of other agencies. As discussed above, all one-stop partner programs are invited to participate in the effort to focus on coordination and duplication reduction efforts.

## C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services to individuals including those populations identified in section II(a)(1)(B). The activities described shall conform to the statutory requirements of each program.

As implementation of WIOA continues, Montana's core partners will continue to strengthen relationships that benefit mutual customers, identify customers (across programs) whose skills sets match businesses' workforce needs, and align resources to promote efficiency and economy of scale.

Through integrated partnerships with business, education, community leaders and workforce programs, Montana has formed Community Management Teams (CMTs), which serve as the state's local workforce organizations. CMTs were originally developed as a group of One-Stop partners, community members, local businesses, economic development representatives and other interested parties. The groups have elected officers and meet on a monthly or quarterly basis, as determined by each CMT. The CMTs identify their community's needs and work together to plan needed workforce development and other partner services. CMTs are organized around each of Montana's One-Stop Centers to address the needs of the population within Montana's vast geographic expanse.

Montana's Job Service offices, community based—organizations, Adult Basic Education (ABE), and Vocational Rehabilitation and Blind Services (VRBS) will align services and work together to serve businesses. Given its small population, Montana's federal formula funding levels are limited. The state has sought – and received – several discretionary and competitive grants that permit partners to expand services and promote alignment. One example is the Health CARE Montana TAACCCT grant. Montana was awarded \$14.9 million to create access to health care training in rural areas. Three full-time positions were established within the state's Registered Apprenticeship program to develop and expand health care apprenticeship training. Montana's first Certified Nursing Assistant (CNA) apprenticeship program was established in the fall of 2015; efforts are currently underway to develop apprenticeship programs for the phlebotomy and pharmacy technician occupations. The TAACCCT grant supports infrastructure and curriculum development at the community colleges, as well as allowing increased career pathway opportunities and attainment of credentials and certificates.

The Temporary Assistance for Needy Families (TANF) and Supplemental Nutrition Assistance Program (SNAP) also partner with the workforce system at the state and local levels and work together to promote integrated services for mutual customers. The core partners, along with TANF, SNAP, Career and Technical Education, Economic Development, Job Corps and other youth programs and various statewide and targeted community programs have developed an asset matrix. This document informs all partners of their respective customer bases, fund sources and performance metrics. The matrix serves as an important first step for partners to examine program gaps, overlaps and opportunities for further alignment. Additionally, partners serve on Community Management Teams (CMTs) that have been established for each one stop system. The role of CMTs is discussed further later in the plan.

Continuing the focus on coordination among partners enhances services to individuals by reducing duplication and promoting integrated service strategies for individual customers. All partners – and their customers – benefit from aligning and leveraging services whenever possible. An example of the value of service alignment is the strong partnership of VRBS and DLI. These partners work closely together to ensure that VRBS customers whose disabilities are less severe and do not meet the VR Order of Selection receive individualized workforce

services at Job Service offices or community based organizations that support their employment goals.

### Alignment with Education

Montana partners have several initiatives that involve educational institutions, both secondary and post-secondary, as described below.

- **Montana Career Pathways** – Office of Public Instruction specialists and post-secondary staff from across the state that work with industries and secondary and post-secondary educational partners to increase student, parent and community awareness of career opportunities aligned with local and regional employment needs. The strategy involves community and school events, targeted school advising and professional development opportunities.
- **Adult Pathways** – Adult Pathways is a strategy designed to prepare adult students for success by assisting them to acquire the academic and career information they need to gain access to a career pathway or to pursue post-secondary education. An adult pathway consists of activities to overcome workforce barriers by bringing together industries, community services, government agencies, post-secondary education to identify, enroll and prepare career-limited adults for high-demand career opportunities.

Since Spring 2015, the Big Sky Pathways coordinators and Adult Basic Education (ABE) directors have been meeting together to coordinate smooth customer transitions from ABE to post-secondary training. In addition, the Carl Perkins Program Manager and ABE Director co-chair the **Moving Pathways Career Pathways Forward Interagency State Team Project**. When the request for proposals for ABE providers is released in 2017, all post-secondary institutions will be encouraged to apply.

- **Dual Enrollment** – High school students can enroll in college courses that may count for both high school and college credits. Dual enrollment courses are offered at reduced rates at Montana's colleges, and mandatory fees are waived. In some cases, the courses are free for high school students.
- **Carl Perkins** – Through the resources available through Perkins, in addition to the state and local funding for career and technical education leveraged through the federal funds, the state is updating career and technical education services and providing more options for students wishing to pursue post-secondary studies.

At the post-secondary level, career and technical education (CTE) programs help young adults preparing for first-time careers and adults who are changing careers or upskilling within a career field to quickly gain the skills and experience directly related to workplace success. Effective CTE programs at the two-year post-secondary institutions are characterized by their close relationship with businesses and smooth transitions of program clients into the workforce at higher levels of income and employment success.

### Montana's Efforts to Enhance Job Seekers' Ability to Attain Post-Secondary Credentials

Montana has several initiatives in place to promote attainment of post-secondary credentials, as described below.

- **Complete College Montana** is a statewide initiative that focuses on increasing the number of Montanans who earn college degrees and certificates. The initiative is focused on increasing the percentage of the population with a college credential from 40% to 60%. This will require colleges and universities in the state to increase their

annual production of degrees and certificates. As a member of Complete College America, the initiative has a common set of progress and outcome metrics and a dashboard to compare states and campuses.

Other goals of Complete College Montana include implementing new funding models (tying college funding to outcomes); reducing the time to attaining a degree, creating incentives for full-time enrollment and utilizing incentive-based financial aid; transforming remediation by clarifying what constitutes college readiness and establishing a statewide approach; and restructuring academic delivery to meet the needs of today's students, including year-round attendance models.

- **Prior Learning Assessment** is a tool for the Montana University System to increase access and promote college completion in a shortened timeframe for new and returning adult learners.
- **HealthCARE Montana** discretionary grant is another multi-partner initiative that is strengthening the two-year college system in the health care fields by improving training opportunities and developing relevant curriculum in the field and promoting successful health care employment for students, with attention to adult learners (especially in rural areas) and to veterans.

#### D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

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

Partners are working together to strengthen the coordination of services to business customers. The Job Service often takes the lead and partners educate businesses on the value of hiring diverse populations and discuss work-based opportunities, including Registered Apprenticeship and on-the-job training. Additionally, DLI works closely with the Governor's Office of Economic Development, the Montana Department of Commerce and the Montana Economic Developers Association to provide the Business Expansion and Retention (BEAR) program available statewide. The BEAR program is operated by the Economic Developers Association and is supported by local community partners that provide resources and expertise for businesses to improve their operations and profitability. Upon request, businesses may receive assessments and technical assistance to help them sustain and expand their companies.

##### Alignment of Education, Workforce and Economic Development

Montana is committed to supporting efficient, effective and responsive delivery of educational programs that are designed to meet the needs of businesses. Several models are already in place; plans to promote success through alignment include:

- Developing and implementing a statewide policy framework to align programs serving the needs of training providers, educational institutions and businesses

- Supporting the Montana University System's efforts to win federal and private grants aimed at enhancing coordination between businesses and the educational system;
- Providing a continuum of training and credential opportunities that promote career advancement;
- Meeting local and unique training needs of high-demand industries, including health care, energy and technology; and
- The State will look to organizations outside its Workforce Development System for opportunities to support local, business engaged, innovative workforce programs.

The state also seeks to promote community colleges, two-year colleges and tribal colleges as essential local and regional suppliers of Montana's trained workforce. This will be accomplished through increasing the involvement of businesses in formal curriculum development and supporting continued expansion of comprehensive two-year education, with a focus on workforce development, access and academic progression.

Job Service staff throughout the state are closely aligned with economic development entities through a variety of shared initiatives, promotion of new businesses and encouragement of entrepreneurship in industries that support existing businesses. An important example of this work is the alignment of the Governor's Office of Economic Development, Montana Department of Commerce, Montana Economic Developers Association and DLI to provide a statewide Business Expansion and Retention program. The program involves volunteer community assessment teams that address the needs of local businesses, upon request. These teams have evaluated grant requests for Montana's small business Incumbent Worker Training program and are now using a designated database to document their efforts, coordinate outreach and track results.

## 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).

Montana is committed to supporting efficient, effective and responsive delivery of educational programs that are designed to meet the needs of businesses. Several models are already in place; future plans to promote success through alignment include: Developing and implementing a statewide policy framework to align programs serving the needs of training providers, educational institutions and businesses; Supporting the Montana University System's efforts to win federal and private grants aimed at enhancing coordination between businesses and the educational system; Providing a continuum of training and credential opportunities that promote career advancement; and Meeting local and unique training needs of high-demand industries, including health care, energy and technology. The State will look to organizations outside its Workforce Development System for opportunities to support local, business engaged, innovative workforce programs. The state also seeks to promote community colleges, two-year colleges and tribal colleges as essential local and regional suppliers of Montana's trained workforce. This will be accomplished through increasing the involvement of businesses in formal curriculum development and supporting continued expansion of comprehensive two-year education, with a focus on workforce development,



access and academic progression. Job Service staff throughout the state are closely aligned with economic development entities through a variety of shared initiatives, promotion of new businesses and encouragement of entrepreneurship in industries that support existing businesses. An important example of this work is the alignment of the Governor's Office of Economic Development, Montana Department of Commerce, Montana Economic Developers Association and DLI to provide a statewide Business Expansion and Retention program. The program involves volunteer community assessment teams that address the needs of local businesses, upon request.

#### 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 will contract for education and trainings services 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 having data that shows successful student exit trends will be provided with funds for to prepare workshops and regional trainings to share instructional strategies and activities that are positively impacting student outcomes.

The state recognizes the importance of students' acquiring 21<sup>st</sup> century work place skills, so the state will provide technical assistance to eligible providers on an as needed basis. Technical assistance will be available for instructional improvement in reading, writing, mathematics, English language acquisition, speaking, as well as distance learning. Technical assistance will be offered in two ways: training with staff from other eligible providers who have demonstrated effectiveness or independent contractors. In either case, the individual contractor will be selected based on their ability to provided 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 may also be available for programs in the use of technology, including digital technology and technology for system efficiencies.

The state will work in collaboration with core partners to develop strategies for student retention and to help eligible providers in developing and implementing the objectives of WIOA, as learner education gains and enhancement of employability skills will increase the success of clients across all core programs. This collaboration may require use of permissible funds.

#### 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).



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

Braiding funds with other core partners for conferences and trainings focused on supporting career pathways will be the way leadership dollars will align with the work of our core partners. This collaboration across core partner agencies will evolve to meet the needs of WIOA implementation and sustainability. 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 needs 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. Thirdly, 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 related to the specific needs of adult learners. Leadership activities in the components of reading will be used to create the foundation for adults to develop the skills for reading from complex text in postsecondary education and employment. Instruction in the essential components of reading will be made available to all programs through various venues depending needs of the individual program staff. Student information system data will be used to determine instructional needs in reading. The state will contract with reading experts to bring job-embedded professional development. Teachers will be required to participate in reading professional development that blends face-to-face and technology.

The state will require each program to conduct monthly audits to evaluate students' pre-posttest 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 regularly scheduled on site 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.

## H. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

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

The state will fund local providers that can provide services to adults 16 years and older, not enrolled in secondary school, to include adult education and literacy services, peer tutoring, career pathways, and concurrent enrollment.

Providers must provide evidence of activities with other education institutions, local workforce partners, and agencies that support student career pathways. The MCIS/PEP Talk will be the common career planner used in adult education programs to share student career pathway information across agencies. The common career planning tool will be a resource for every partner.

Beyond assisting students for 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 (completing applications, writing resumes, scheduling campus visits, etc.) that can be barriers to success. Providers must be willing to cooperate with agency partners to provide the wrap-around services common clients will require.

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. Providers must be able to disclose their methodology for ensuring that business and labor market needs are helping drive their instructional practice.

Partnership with Register Apprenticeship has resulted in establishing training that results in post-secondary, industry recognized credentials, including those in pathways and stacked credential programs. In addition, Montana University System (MUS) and DLI have expanded alignment between the workforce system and higher education. This work is directly related to increased credentials, apprenticeship registrations, and IRCs.

## 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.

Job Service staff throughout the state are closely aligned with economic development entities through a variety of shared initiatives, promotion of new businesses and encouragement of entrepreneurship in industries that support existing businesses. An important example of this work is the alignment of the Governor's Office of Economic Development, Montana Department of Commerce, Montana Economic Developers Association and DLI to provide a statewide Business Expansion and Retention program. The program involves volunteer community assessment teams that address the needs of local businesses, upon request.

Montana has in the past and continues to operate as a single workforce area with one planning region and three workforce regions. 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, human services, education and economic development partners are working more closely together than ever to ensure that services are coordinated and aligned, including participation in partners' conferences and joint strategy-planning activities.

Through integrated partnerships with business, education, community leaders and workforce programs, Montana has formed Community Management Teams (CMTs), which serve as the state's local workforce organizations. CMTs were originally developed as a group of One-Stop partners, community members, local businesses, economic development representatives and other interested parties. The groups have elected officers and meet on a monthly or quarterly basis, as determined by each CMT. The CMTs identify their community's needs and work together to plan needed workforce development and other partner services.

Community service includes worksites in economic development. Economic development is part of the one-stop system and are often members of the Community Management Teams in several areas across the state including the more rural locations in Montana. SCSEP staff are also part of the Community Management Teams in these areas which presents them the opportunity to provide information to and recruit community service worksites through local economic development.

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## B. STATE OPERATING SYSTEMS AND POLICIES

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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–

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

The Research and Analysis Bureau of the DLI provides online access to current and up-to-date 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 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.

### B. DATA-COLLECTION AND REPORTING PROCESSES USED FOR ALL PROGRAMS AND ACTIVITIES, INCLUDING THOSE PRESENT IN ONE-STOP CENTERS\*.

WIOA programs under Titles I and III collect client intake and program activity data, including any information required for reporting, using the MontanaWorks system. WIOA programs under Title II collect client data using the MACS system and data under Title IV is collected using the CASES 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 has developed a new system for developing 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 PIRL, and other reporting documents.

- On a quarterly basis each program submits the necessary client data from each programs' respective data system to the 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 is 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 reporting 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 Unemployment Insurance wage records, FEDES, WRIS/WRIS2 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, DESCRIBE THE STATE'S PROCESS FOR DEVELOPING GUIDELINES FOR STATE-ADMINISTERED ONE-STOP PARTNER PROGRAMS' CONTRIBUTIONS TO A ONE-STOP DELIVERY SYSTEM, INCLUDING BENCHMARKS, AND ITS GUIDANCE TO ASSIST LOCAL BOARDS, CHIEF ELECTED OFFICIALS, AND LOCAL ONE-STOP PARTNERS IN DETERMINING EQUITABLE AND STABLE METHODS OF FUNDING INFRASTRUCTURE IN ACCORDANCE WITH S E C . 121(H)(1)(B). BEGINNING WITH THE STATE PLAN MODIFICATION IN 2018 AND FOR SUBSEQUENT STATE PLANS AND STATE PLAN MODIFICATIONS, THE STATE MUST ALSO INCLUDE SUCH GUIDELINES .

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DLI publishes and maintains WIOA policies that provide guidance regarding the operation and service delivery of WIOA programs in keeping with state and federal laws and regulations: [WSD Policy](#)

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

OPI maintains guidance on WIOA as it pertains to ABE programs:  
<http://opi.mt.gov/Programs/CTAE/ABE.html>.

As all core partners begin to operationalize WIOA we have agreed and will work to develop integrated guidance that speaks in one voice, on behalf of all partners, to all WIOA programs and services. However, given the enormity of program changes (particularly for VR) and the timeline of state plan submission, that effort is in concept-form.

For ongoing, updated or new guidance, the WIOA core partner agencies and the State Workforce Innovation Board (SWIB) would be responsible for drafting, publishing and coordinating those, to include policy guidance, service delivery strategies, program and related measurements and funding.

MT has no local workforce areas so the responsibility for coordinating and communicating with CEO's, workforce program contractors, and other local workforce and economic development partners falls to state WIOA core partners and SWIB.

All state plan modifications will be, as was the case for the full original WIOA combined state plan, be routed through WIOA partners, SWIB, and the Governor for review, comment and approval.

The State and its one-stop partners, in conjunction with SWIB, has developed guidelines for State-administered program contributions to the one-stop system including guidelines that establish program benchmarks, processes to gauge that performance, cost-sharing methodologies and triggers, and joint policy development and distribution processes.

### 3. STATE PROGRAM AND STATE BOARD OVERVIEW

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#### 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 Program; Migrant and Seasonal Farmworker Program; Senior Community Services Employment Program; Foreign Labor Certification; Federal Bonding; National Dislocated Worker Grants; Montana’s Incumbent Worker Program; Jobs for Montana’s Graduates; and Labor Market Information. The Job Service Operations Bureau along with community-based organizations coordinate and guide 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. Workforce uses an automation system called MWorks to implement and track programs and services.

Vocational Rehabilitation Blind and Low Vision (VRBS) programs fall under the direction of the Montana Department of Public Health and Human Services (DPHHS). This agency is represented on the SWIB. In addition to service to the SWIB, DPHHS is also a signatory partner of the state One–Stop Delivery System’s Memorandum of Understanding and Consortium Agreement, whereby the parties agree to support all Job Service offices in Montana. VRBS provides training to their partners on their services, in addition to actively sharing their expertise to ensure all customers are served effectively – including veterans, customers with disabilities and Montana’s American Indian population. VRBS uses an automation system called MACS (and for other DPHHS programs, CHIMES) to implement and track programs and services.

Adult Basic Education (ABE) programs fall under the direction of the Montana Office of Public Instruction. This agency is represented on the SWIB. In addition to service 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 all Job Service offices in Montana. Additionally, ABE coordinates the Interagency Career Pathways group. Members of this group include, but are not limited to, representatives from various workforce partners such as ABE, DPHHS, DLI, SWIB staff, the Governor’s Office and the Montana University System. ABE uses an automation system called MABLE to implement and track programs and services.

MT has no local workforce areas, so all functional operations are as single area state coordinated locally via CMT’s and other cooperative groups.

The state workforce system is overseen by the State Workforce Innovation Board (SWIB). 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.



SWIB membership includes, among others, private sector businesses, Labor & Industry, Health & Human Services, and Public Instruction.

## B. STATE BOARD

Provide a description of the State Board, including—

The mission of the Montana 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 use resources beyond WIOA funding, while providing necessary system oversight. The SWIB accomplishes this through the following actions:

- Making policy recommendations for the Governor related to the establishment and maintenance of an efficient, integrated, statewide workforce development system to train the greatest 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;
- The State looks to organizations outside its Workforce Development System for opportunities to support local, business engaged, innovative workforce programs;

The SWIB is comprised of a majority of business leaders in the State of Montana, who are stakeholders in attaining quality outcomes for workforce and economic development initiatives. These private industry representatives, along with public and workforce representatives, play a vital role in ensuring that businesses have access to a prepared workforce and that job seekers can access services, resources and training that will enable them to obtain employment.

## 1. MEMBERSHIP ROSTER

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

- Casey Blumenthal, Montana Hospital Association
- Dean Bentley, NorthWestern Energy
- Commissioner Galen Hollenbaugh, Montana Department of Labor & Industry
- Vicky Byrd, Montana Nurses Association
- Barry Reddick, Collision Pro
- Al Ekblad, Montana AFL-CIO
- Grover Wallace, Stillwater Mining Company
- Karen Baumgart, BillingsWorks
- Jacquie Helt, SEIU Healthcare 775NW

- Superintendent Elsie Arntzen, Office of Public Instruction
- Jennifer Kobza, HDR Engineering, Inc.
- Miles McCarevel, Iron Workers Union Local 14
- Commissioner Mike McGinley, Beaverhead County
- Director Sheila Hogan, Montana Department of Public Health & Human Services
- Kevin Poulin, the Boeing Company
- Representative Vince Ricci, Montana State Legislature, House of Representatives
- Loren Rose, Pyramid Lumber
- Scott Trent, Montana Rail Link
- Commissioner Jane Weber, Cascade County
- Paul Hopfauf, Montana-Dakota Utilities

## 2. 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 and the WIOA committee. In addition, the board will convene ad hoc committee to work on topic-specific issue recommendations from the Governor and established priorities of the SWIB. All SWIB committees conduct business 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.

**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

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##### 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 consider local and regional planning goals.

Montana is a single workforce area and programs are contracted out directly to WIOA service providers for Title I and III programs by the Montana Department of the Labor and Industry.

Each service provider for Title I and III programs are monitored once every year 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. The program managers are housed in a separate bureau from the monitoring team. The program manager work with the local service providers to resolve monitoring findings and provide technical assistance.

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 PARTNER PROGRAMS

Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. Such state assessments should consider 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 one time per year and technical assistance is provided as needed. With the TAA program starting to be reported on the PIRL in PY18, we will have access to quarterly reports for the program which were not available through the old reporting system. This will give Montana another tool to 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 being met and provides technical assistance as necessary. Data validation is conducted for the SCSEP program each year 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.

Up until this point, the Montana Department of Labor and Industry has been focused on implementing WIOA and the changes that have occurred. The reporting change for WIOA moving to the PIRL was only implemented across the country in October 2017 so it is too early to provide any meaning full assessment of the effectiveness of the core programs based on current results.

Montana will use the SAM Team to continue to evaluate assessments that can be used to determine effectiveness of the core programs and strategize based on the outcomes.

Montana has implemented a data warehouse allowing the Department of Labor to collect data across core programs and is currently looking into the feasibility of a common case management system for all core programs to use. As the state continues to collect data, this will be used to implement assessments based on SAM Team recommendations.

#### 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 collected within our 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.

The Department of Labor & Industry also has active MOUs with the Departments of Corrections, the Office of the Commissioner of Higher Education, the Office of Public Instruction, 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

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

### A. FOR TITLE I PROGRAMS

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

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

Funds will be awarded to core program providers who can demonstrate their capacity to collaborate and coordinate with other core partner programs. WIOA Youth funding is distributed through a formula that has been approved by the SWIB. As a single workforce area, the funds are distributed using Montana Association of Counties (MACo) Districts. Youth services are contracted primarily to community-based organizations within the MACo districts. In the Northwest corner of the state, the DLI's Jobs for Montana's Graduates program provides WIOA youth services. Other non-Job Service entities, like community-based organizations, contract with the Department of Labor and Industry to provide youth services. Youth funding method: 1/3 unemployed in ASU; 1/3 excess unemployed (>4.5%); 1/3 total number of individuals in the state, aged 16–21, who are economically disadvantaged

Montana applies a 90% hold harmless provision to WIOA Youth funds. Our policy has been updated and can be found at: [WIOA Title I Youth Program Policy](#)

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

Adults: 1/3 unemployed in ASU 1/3 excess unemployed (>4.5%) 1/3 total number of individuals in the state, aged 22 – 72, who are economically disadvantaged

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

Dislocated Workers: Insured unemployed, using data for regular UI claims and UCFE claims Share of total individuals in the state who are economically disadvantaged (using Excess Poverty statistics and 70% of the Lower Living Standard Income Level, excluding college and military) for individuals aged 22–72 Excess unemployed (>4.5%) Declining employment (calculated using annual average employment) Agricultural unemployment Long-term unemployment

As members of the one stop system all Job Service Offices work closely with the Dislocated Worker clients. To reach the goal of employment the offices work with the clients to work on interview skills, assessments, career planning, assistance towards skills for self-sufficiency, suitable training services, and/or On the Job Training. The offices work on providing the services to help the client become self-sufficient. The Job Service offices policy is that local areas Dislocated Worker budgets stay within 90% of the prior two years allocation. This will be done by reviewing local office budgets for the past two years and comparing them to draft budget of the current year. If any of the local offices show more than a 10% decrease from

the prior years, adjustments will be to keep them with in the 90%.

As members of the one stop system, all Job Service Offices work closely with the Dislocated Worker clients. To reach the goal of employment the offices work with the clients to work on interview skills, assessments, career planning, assistance towards skills for self- sufficiency, suitable training services, and/or On the Job Training. The offices work on providing the services to help the client become self-sufficient.

State policy for distribution of dislocated worker funds to local areas has been updated to reflect that a "hold harmless" clause is in place so that each local area is guaranteed to receive an allocation percentage for a year that is no less than 90% of the average allocation percentage for that the local area for the prior two years. This is accomplished by reviewing local office budgets for the past two years and comparing them to a draft budget for the current year.

## B. FOR TITLE II:

### 1. MULTI-YEAR GRANTS OR CONTRACTS

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

The 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 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 can provide adult education, a consortium or coalition of entities listed, a partnership between a business and an entity listed. The initial grant announcement was sent out in late April 2017 and allocations were announced in June 2017. The competitive process began with a legal notice posted. This was followed by the grant release, a bidder's conference to provide technical assistance, application review, and a list of accepted applicants with follow-up budget and program negotiations with each accepted applicant.

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 will use the same grant application process. Grantees receiving funds under the initial competition will be required to submit annual extension plans each year until such time the state determines it is necessary to issue a new competition for the state or a specific region.

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 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.



## 2. 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.

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 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 can provide adult education, a consortium or coalition of entities listed, a partnership between a business and an entity listed.

## 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 our client benefits system. Since VRBS is a combined general and blind services agency, the funds are not distributed separately.



## 6. PROGRAM DATA

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### A. DATA ALIGNMENT AND INTEGRATION

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

#### 1. 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.

Montana is still in the development phase with an Integrated Workforce Registration (IWR) and a Workforce Integrated Profile Page (WIPP). The first phase, was completed in March 2016, which set up a single sign-on where customers register once, with a limited number of data points, and then have an account created in both MontanaWorks and the UI data system. Customers can add more detailed information pertinent to the services they access beyond initial registration. In phase two, DLI will build the WIPP landing page, which will provide real-time information from both MontanaWorks and the UI system on a single page. ABE and VR data will be included in WIOA performance reporting, but not included in MontanaWorks. Currently, Montana has no common reporting system between all programs to produce reports required by WIOA. Until such a system is created, each individual program will provide program data to Montana's DLI Research and Analysis Bureau (R&A), where analysts will produce the reports required for WIOA. R&A has experience matching client records with state Unemployment Insurance wage records, higher education enrollment and completion records, as well as occupational licensing data. These matches will provide enhanced data for the programs while upgrades to case management systems are made to allow data collection that meets reporting requirements. Along with completing the administrative records-matching, R&A will compile the data into the PIRL format and calculate the performance measures for the final reports based on the performance report template. Using R&A as a centralized hub for generating performance reports will provide consistency in reporting across programs and allow for the interchange of demographic and background data between programs. This process will allow for the most descriptive and consistent data to be used in producing the required performance reports.

#### 2. DESCRIBE THE STATE'S PLANS TO INTEGRATE DATA SYSTEMS TO FACILITATE STREAMLINED INTAKE AND SERVICE DELIVERY TO TRACK PARTICIPATION ACROSS ALL PROGRAMS INCLUDED IN THIS PLAN.

The DLI Research and Analysis (R&A) staff's experience with administrative records-matching as a method of program evaluation will be leveraged under WIOA. Quarterly wage records provide an opportunity to observe the change in clients' wage histories over time and evaluate the impact program participation has on a customer's wages. In the past, R&A has performed analyses like these to evaluate outcomes from participation in

Registered Apprenticeship programs and Unemployment Insurance programs to highlight the program impacts on an individual's wages. More recently, R&A has begun collaborating with Montana's Office of the Commissioner of Higher Education (OCHE) to share data on enrollment and outcomes in higher education programs throughout Montana. This data sharing allows for a more holistic evaluation that looks beyond an individual's short-term gains in wages and accounts for educational gains that lead to long-term and otherwise unobserved improvements in an individual's wage potential. Currently, R&A and OCHE are working together to develop college report cards that will detail outcomes for Montana's colleges, in terms of degrees awarded, projected available jobs in various programs' occupational training, and wages of graduates. Results of the report cards will be used for planning purposes and to help program staff make informed decisions in supporting customers. Plans for Data Integration Montana is in the development phase with an Integrated Workforce Registration (IWR) and a Workforce Integrated Profile Page (WIPP). The first phase, was completed in March 2016, which set up a single sign-on where customers register once, with a limited number of data points, and then have an account created in both MontanaWorks and the UI data system. Customers can add more detailed information pertinent to the services they access beyond initial registration. In phase two, DLI will build the WIPP landing page, which will provide real-time information from both MontanaWorks and the UI system on a single page. ABE and VR data will be included in WIOA performance reporting, but not included in MontanaWorks. The SWIB assists the Governor in aligning technology and data systems across core programs through a review of program implementation and the steps underway for system coordination. The board receives regular updates on the status of alignment efforts and will make alignment recommendations to the core partners, as appropriate. Alignment of technology and data systems will allow programs to realize true one-stop service delivery, through identification of common customers and providing suitable referrals based on data. Additionally, alignment of technology and customer data allow programs to leverage resources, eliminate duplication and provide new opportunities for innovative cross-program solutions. Technology and data system alignment also improves customers' service experience. To align technology across core partners, an assessment of the processes, eligibility, enrollment, reporting and business needs of each of the core partners will be conducted. After the assessment is complete, research will be conducted to determine if there is technology available to meet those needs or if current technology systems could be upgraded to achieve one, integrated system.

Currently, Montana has no common reporting system between all programs to produce reports required by WIOA. Until such a system is created, each individual program will provide program data to Montana's DLI Research and Analysis Bureau (R&A), where analysts will produce the reports required for WIOA. R&A has experience matching client records with state Unemployment Insurance wage records, higher education enrollment and completion records, as well as occupational licensing data. These matches will provide enhanced data for the programs while upgrades to case management systems are made to allow data collection that meets reporting requirements. Along with completing the administrative records-matching, R&A will compile the data into the PIRL format and calculate the performance measures for the final reports based on the performance report template. Using R&A as a centralized hub for generating performance reports will provide consistency in reporting across programs and allow for the interchange of demographic and background data between programs. This process will allow for the most descriptive and consistent data to be used in producing the required performance reports.

Currently, Montana can capture information to assess the progress of clients exiting core programs to enter and complete post-secondary education or enter and remain in employment. This can be accomplished through R&A. R&A has access to several databases that can help provide information on progress of clients for these key milestones. R&A will compile data for each of the lead agencies for assessment of

progress. Montana will be working toward consolidation of data in a data warehouse or combined reporting system. When that system is in place, lead agencies will be able to assess progress through use of queries.

Montana's quarterly UI wage records will form the foundations of program evaluation and measurement of performance outcomes for the WIOA core programs. R&A staff are experienced in matching state UI wage record files to program clients to ensure that performance outcomes can be produced quickly and consistently. As noted earlier in this section, R&A staff will use the UI wage record data to support system-wide analyses of customer outcomes and for staff to guide customers in selecting jobs and training opportunities that are likely to result in quality career paths.

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 MontanaWorks automated system have been replaced with client identification numbers. Social Security Numbers have been removed from printouts in MontanaWorks 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.

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

The SWIB assists the Governor in aligning technology and data systems across core programs through a review of program implementation and the steps underway for 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. Alignment of technology and data systems will allow programs to realize 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. Technology and data system alignment will also improve customers' service experience. To align technology across core partners, an assessment of the processes, eligibility, enrollment, reporting and business needs of each of the core partners will be conducted. After the assessment is complete, research will be conducted to determine if there is technology available to meet those needs or if current technology systems could be upgraded to achieve one, integrated system.

### 4. 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 and Industry operates Titles I and III of WIOA, Montana Department of Public Health and Human Services operates Title IV of WIOA, and Montana Office of Public Instruction operates Title II of WIOA.

Montana Department of Labor and 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.

Montana has built a data warehouse that will be able to house all WIOA data from each state agency and reports will be generated out of that system combining the three state agencies. The warehouse will be able to provide wage information appropriately to our core partners. Currently, the warehouse has been developed and we are working toward being able to utilize the system.

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

## B. ASSESSMENT OF PARTICIPANTS' POST-PROGRAM SUCCESS

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

Currently, Montana can capture information to assess the progress of clients exiting core programs to enter and complete post-secondary education or enter and remain in employment. This can be accomplished through the Department of Labor and Industry's Research and Analysis Bureau (R&A). R&A has access to several databases that can help provide information on progress of clients for these key milestones. R&A will compile data for each of the lead agencies for assessment of progress. Montana is working toward consolidation of data in a data warehouse or combined reporting system. When that system is in place lead agencies will be able to assess progress through use of queries.

The three Core programs are all conducting Post-program success differently. Title 1 conducts quarterly Follow-Up calls to Adult and Dislocated Worker clients who have exited to employment. These clients are contacted at least once a quarter to see if they need assistance in job retention, wage gains and career progress. Appropriate follow-up services may vary among clients, for example clients with multiple employment barriers and limited work histories may need significant follow-up services to ensure long-term success in the labor market including program funded supportive services. Others may identify an area of weakness in WIOA training that may affect their ability to progress further in their occupation or to retain employment. Follow-up services for WIOA Adult and Dislocated Workers could include additional career planning and counseling, contact with the client's business, 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. Title 1 Youth clients must receive some form of follow-up services for a minimum duration of 12 months. Follow-up services are critical services that are provided following a youth's exit from the program to help 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 client's business, 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 clients in employment

and/or post-secondary education. Adult Education and Vocational Rehabilitation programs follow clients after exit through performance outcomes.

### C. USE OF UNEMPLOYMENT INSURANCE (UI) WAGE RECORD DATA

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

The state will utilize 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 MISTICS system. Queries are also made to FEDES and WRIS2 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 FEDES and WRIS2 records when appropriate, are a fundamental piece of Montana's program evaluation goals. As part of administration of Montana's U.S. Bureau of Labor Statistics (BLS) programs, Montana's DLI R&A Bureau receive 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 standards of the BLS 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 utilize the statistical software SAS to match WIOA clients with their wage records using SSNs as the primary key to link records.

Following this match, SAS 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 demonstrating the employment and wage benefits of apprenticeship programs in general, as well as apprenticeships for specific high performing occupations.
- A report on 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 on 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. The report 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. Plans are in place to evaluate the MontanaWay program, a partner program to RESEA for UI claimants, using a randomized evaluation model. The goal of the MontanaWay evaluation is to measure the effectiveness of the program as well as demonstrate the ability to use random evaluation methods for future projects. 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 two years, the Department has established MOUs for the sharing of PII 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. These relationships have allowed the Department to provide better research on our workforce system. The Department is also working on establishing a MOU with the K-12 system, which also requires the establishment of a MOU with the Department of Justice to obtain driver's licensing records due to the absence of SSNs on the K-12 system database. The Department hopes to have these MOUs in place by the end of 2018, with potential research projects starting in 2019.

#### D. PRIVACY SAFEGUARDS

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

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 MontanaWorks automated system have been replaced with client identification numbers. Social Security Numbers have been removed from printouts in MontanaWorks and staff have been trained to protect PII in paper form and in the transfer of PII across programs.



## 7. PRIORITY OF SERVICE FOR VETERANS

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

Montana's Jobs for Veterans State Grant funds nine Disabled Veterans Outreach Program (DVOP) Specialists and one Veterans Intensive Service Coordinator. Priority of service is given at all Job Service 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; and A family member (parent, spouse, child, step-family member or other that live with but are not a member of the family) that provides personal care services to an eligible veteran.

Priority of Service for Veterans has been implemented through training of the staff in the local 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 is accomplished by the completion of the intake form when a Veteran or eligible spouse is identified upon entry into the Job Service. The intake form will not be completed by the DVOP. If a Veteran or eligible spouse is determined to have a qualifying Significant Barrier to Employment (SBE) they will be referred to the DVOP.

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

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

The State of Montana offers services to individuals with disabilities through the Job Service offices across the state. The workforce system is continually developing new and fostering ongoing partnerships to achieve seamless, comprehensive and integrated access to services and expanding the system's capacity to serve customers and businesses with disabilities. Disability Resource Coordinators (DRCs) are funded through Wagner-Peyser and are located at each Job Service office. These coordinators assist individuals with barriers with a variety of employment-related services, and serve as a resource to the workforce community. The DRCs also develop linkages with and collaborate on an ongoing basis with businesses to facilitate job placement for persons with barriers to employment. The DRCs assist anyone that encounters additional barriers to securing employment, such as individuals with physical or mental disabilities, learning disabilities, ex-felons, the aging workforce, youth at risk and veterans. Disability Resource Coordinators work with partner agencies routinely to garner mutual support and share information through Community Management Teams, interagency and community organizations. The DRCs identify gaps in service and create working groups to recognize individuals who may benefit from their services. The DRCs, in collaboration with service providers, organize Resource Fairs, provide training opportunities to customers and the business community, grow relationships with public and private schools to assist with continual learning opportunities. DRCs also attend training annually to receive new information and collaborate on the best ways to support their targeted populations. This training has been done in conjunction with Vocational Rehabilitation and Blind Services and the Developmental Disabilities Bureau. Montana is a single-area workforce system. Montana is a single workforce area state, therefore the state of Montana designed its one-stop system to best meet the workforce needs of the state. As part of the one-stop certification, the SWIB certified the comprehensive one-stop and the affiliate centers. Part of the criteria for system certification was that the comprehensive one-stop and all its affiliate centers delivered services in an integrated and accessible way to ensure that all sites can serve all customers, regardless of ability.

Montana's one-stop service delivery system will comply with provisions of the American's with Disabilities Act (ADA) of 1990 regarding the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. As part of Montana's one-stop operator application process, it will request that all applicants submit information on its facility's ADA accessibility to better assess barriers to services and better serve persons with disabilities.



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

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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 state of Montana provides LEP accessibility in the One–Stop System. Through Montana state government, three telephone–based language interpreting services are available in 250+ languages and dialects, 24 hours a day and 365 days a year. To comply with federal Wagner Peyser monitoring requirements all One–Stop Centers display EEO and Minimum Wage posters in Spanish along with all other required state and federal posters in English. The state ABE will operate Integrated English Literacy and Civics programs and serve all students in need of English language acquisition and civics education through eligible providers. VRBS requires that rehabilitation counselors who are hired specifically to work with deaf and hard of hearing consumers have fluent sign language skills. Sign language interpreters for the deaf or hard of hearing are also provided when necessary. Other accommodations, such as documentation in alternative formats, are routinely made by VRBS. The policy of VRBS is to consult with the consumer to determine the most appropriate mode of communication. Montana has a relay system for telephone communication with consumers who are deaf or hard of hearing and all offices are equipped with Ubi–Duos. Three offices (with the highest numbers of deaf/hard of hearing clients) have video phones for enhanced communication. The Montana Telecommunications Access Program is housed in the Disability Employment and Transitions Division and lends tremendous technical support to the staff of VRBS working with sensory impaired consumers. BLVS has also developed a full time Assistive Technology Specialist position. VRBS purchases interpreter services as needed by consumers. The issue of consumers whose primary language is not English is a very rare issue in Montana. The issue is most likely to occur with American Indian consumers who are the largest minority group in Montana. Even with this group, it is quite rare to have a consumer whose primary language is not English. Montana is fortunate to have six American Indian Vocational Rehabilitation Services programs (funded through section 121 of the Rehabilitation Act) located in Montana. The local offices have good working relationships with the American Indian Vocational Rehabilitation Services programs and they are an excellent resource for assisting American Indians who are not English speakers. The Billings region has the largest population of Spanish speaking consumers and they have utilized assistance from the local migrant council when working with consumers whose primary language is Spanish. In other very rare instances when working with consumers who speak other languages as their primary language, counselors have been able to utilize family members of the consumer to interpret.

#### IV. COORDINATION WITH STATE PLAN PROGRAMS

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

To ensure workforce system effectiveness, Montana has organized a State Agency Management (SAM) Team for Workforce Development. Meetings are held on a quarterly basis. SAM Team meetings are facilitated and agenda-based. Required team members include lead state agency officials representing WIOA core programs from: DLI (WIOA and Wagner–Peyser), Office of Public Instruction (Adult Basic Education), and the Department of Public Health and Human Services (Vocational Rehabilitation and TANF). Additional membership includes representatives from all state agencies involved in the administration of workforce development programs, including – but not limited to – the Department of Commerce, the Office of the Commissioner of Higher Education, and the Governor’s Office of Economic Development. Team members are expected to share information regarding workforce development programs and efforts within their agencies. Other expectations are that team members will: support Job Service offices and the One–Stop certification process; act as an advisory group to each member’s SWIB representative; act as advisors to each other’s workforce development–related programs to ensure that efforts are coordinated and not conflicting; and coordinate economic development strategies with the Office of the Governor and other state agencies. The SAM Team is developing a Continuous Improvement Plan (CIP) for measuring and evaluating the success and effectiveness of the workforce system across the state. This CIP is presented to the SWIB annually for review and approval. In addition, requests for data and statistics relevant to the workforce system partner programs are made available to the SWIB by the SAM Team and an annual update is provided to the SWIB regarding system measurements under the CIP. Montana, as a small state with limited workforce program funds and a significant small–business climate (97% of all private businesses have fewer than 50 employees), faces unique challenges and is committed to ensuring its workforce system meets the needs of the state’s businesses and workers, today and in the future. Such challenges demand that WIOA core and other partners effectively leverage partnerships and collaborate in service delivery efforts. These efforts allow the state to ensure that customer expectations and needs are understood; that service offerings and locations meet those needs without duplication; that data evaluation tools and processes are in place; and that the system continually evolves and improves on its own. To support these efforts, Montana continues to work together across provider and program lines to develop a seamless, demand–driven workforce service delivery system comprised of public and private organizations, businesses, local, state and federal employment and training programs, secondary, post–secondary and adult education programs, Vocational Rehabilitation and Blind Services, and other human capital support agencies. This system works to engage, support and enhance the economic health of Montana’s business community and ensure a well–trained and highly qualified workforce for years to come. Workforce System Vision and Goals Montana’s vision for its workforce system is one in which workforce development occurs via innovation through partner collaboration, integrated service delivery, data analysis and ongoing evaluation and improvement.

Vocational Rehabilitation and Blind Services (VRBS) and Adult Basic Education (ABE) are aligned with other workforce programs. Partners will better understand industry training needs in the state’s local economies and will increase promotion of training services available to businesses through Job Service offices including Incumbent Worker Training, Apprenticeship, OJT and soft skills training. Montana’s workforce system goals include: Continuing to tap what have historically been considered non–traditional labor pools; Streamlining duties of local service providers to allow holistic focus on the goals of WIOA; Devising a business engagement strategy that includes all partners including local workforce organizations that operate outside the State’s Workforce Development System, and is not

solely built on collecting job postings; Understanding customer needs and expectations and acknowledging that while employment is the goal, our value to customers cannot always and only be measured in those terms; Ensuring that career planning is a central piece of our integrated service delivery model; Automating ongoing customer intake to better evaluate customer data and help drive more effective and consistent service delivery; Performing better data analysis to evaluate customer needs and system efforts, set better expectations, and increase overall situational understanding; Gain better understanding of local workforce needs and initiatives through local workforce organizations that operate outside the State's Workforce Development System; and Help direct resources to local workforce initiatives and organizations that are business focused and collaborative which operate the State's Workforce Development System. Montana's workforce system will generally achieve these goals by engaging with and empowering:

- The State Workforce Innovation Board which brings together private businesses and workforce service and education & training providers;
- State government leadership;
- The SAM team made up of state agency core program managers and other workforce partners;
- Local partner management teams that include Community Management Teams, Job Service Employer Committees, Business Expansion and Retention committees, Chambers of Commerce, Economic Development Corporations, Small Business Development Councils, Tribal Councils and others;
- Local one stop delivery teams that ensure service delivery staff are properly trained, adequately equipped, and able to effectively engage customers to provide proper and just-in-time workforce solutions; and
- Local workforce organizations that operate outside the State's Workforce.

Several strategies are planned to align programs, including: The SWIB Apprenticeship, On-the-Job Training and Career Pathways Committee includes the leadership from Adult Basic Education. Through regular communication, partners will continue to align service strategies for job seekers with the workforce needs of Montana's businesses. On a regular basis, DLI invites the core partners to Job Service driven events such as Job Service Employer Committee meetings, meetings of Community Management Teams, Job Fairs and other events where the core partners can collaborate and leverage resources on behalf of their customers. DLI invites agency partners to provide training to Job Service staff and promote interagency staff training for coordinated service strategies. Agency partners are also invited to – and invited to present at – Job Service training events and conferences. This promotes shared information and knowledge. Montana's workforce system will continue to collaborate with economic development entities at the state level and local levels. Several examples of coordinated efforts are discussed throughout the plan.

Given its small population, Montana's federal formula funding levels are limited. The state has sought – and received – several discretionary and competitive grants that permit partners to expand services and promote alignment. One example is the Health CARE Montana TAACCCT grant. Montana was awarded \$14.9 million to create access to health care training in rural areas. Three full-time positions were established within the state's Registered Apprenticeship program to develop and expand health care apprenticeship training. Montana's first Certified Nursing Assistant (CNA) apprenticeship program was established in the fall of 2015; efforts are currently underway to develop apprenticeship programs for the phlebotomy and pharmacy technician occupations. The TAACCCT grant supports infrastructure and curriculum development at the community colleges, as well as allowing increased career pathway opportunities and attainment of credentials and certificates.

The Temporary Assistance for Needy Families (TANF) and Supplemental Nutrition Assistance Program (SNAP) also partner with the workforce system at the state and local levels and work together to promote integrated services for mutual customers. The core partners, along with TANF, SNAP, Career and Technical Education, Economic Development, Job Corps and other

youth programs and various statewide and targeted community programs have developed an asset matrix. This document informs all partners of their respective customer bases, fund sources and performance metrics. The matrix serves as an important first step for partners to examine program gaps, overlaps and opportunities for further alignment. Additionally, partners serve on Community Management Teams (CMTs) that have been established for each one stop system. The role of CMTs is discussed further later in the plan. Continuing the focus on coordination among partners enhances services to individuals by reducing duplication and promoting integrated service strategies for individual customers. All partners, and their customers, benefit from aligning and leveraging services whenever possible. An example of the value of service alignment is the strong partnership of VRBS and DLI. These partners work closely together to ensure that VRBS customers whose disabilities are less severe and do not meet the VR Order of Selection receive individualized workforce services at Job Service offices or community based organizations that support their employment goals. Partners are also working together to strengthen the coordination of services to business customers. The Job Service often takes the lead and partners educate businesses on the value of hiring diverse populations and discuss work-based opportunities, including Registered Apprenticeship and on-the-job training. Additionally, DLI works closely with the Governor's Office of Economic Development, the Montana Department of Commerce and the Montana Economic Developers Association to provide the Business Expansion and Retention (BEAR) program available statewide. The BEAR program is operated by the Economic Developers Association and is supported by local community partners that provide resources and expertise for businesses to improve their operations and profitability. Upon request, businesses may receive assessments and technical assistance to help them sustain and expand their companies

The Job Service's Business Services Program performance has been enhanced, through stronger awareness by staff of the need for outreach businesses, staff training, development of tools and resources, and enhancement of the database used to record services to business customers.

Alignment with Education Montana partners have several initiatives that involve educational institutions, both secondary and post-secondary, as described below.

- **Montana Career Pathways** – Office of Public Instruction specialists and post-secondary staff from across the state that work with industries and secondary and post-secondary educational partners to increase student, parent and community awareness of career opportunities aligned with local and regional employment needs. The strategy involves community and school events, targeted school advising and professional development opportunities.
- **Adult Pathways** – Adult Pathways is a strategy designed to prepare adult students for success by assisting them to acquire the academic and career information they need to gain access to a career pathway or to pursue post-secondary education. An adult pathway consists of activities to overcome workforce barriers by bringing together industries, community services, government agencies, post-secondary education to identify, enroll and prepare career-limited adults for high-demand career opportunities. Since Spring 2015, the Big Sky Pathways coordinators and Adult Basic Education (ABE) directors have been meeting together to coordinate smooth customer transitions from ABE to post-secondary training. In addition, the Carl Perkins Program Manager and ABE Director co-chair the Moving Pathways Career Pathways Forward Interagency State Team Project. When the request for proposals for ABE providers is released in 2017, all post-secondary institutions will be encouraged to apply.
- **Dual Enrollment** – High school students have the opportunity to enroll in college courses that may count for both high school and college credits. Dual enrollment courses are offered at reduced rates at Montana's colleges, and mandatory fees are waived. In some

cases, the courses are free for high school students.

- **Carl Perkins** – Through the resources available through Perkins, in addition to the state and local funding for career and technical education leveraged through the federal funds, the state is updating career and technical education services and providing more options for students wishing to pursue post-secondary studies. At the post-secondary level, career and technical education (CTE) programs help young adults preparing for first-time careers and adults who are changing careers or upskilling within a career field to quickly gain the skills and experience directly related to workplace success. Effective CTE programs at the two-year post-secondary institutions are characterized by their close relationship with businesses and smooth transitions of program clients into the workforce at higher levels of income and employment success.

Montana's Efforts to Enhance Job Seekers' Ability to Attain Post-Secondary Credentials Montana has several initiatives in place to promote attainment of post-secondary credentials.

- **Complete College Montana** - is a statewide initiative that focuses on increasing the number of Montanans who earn college degrees and certificates. The initiative is focused on increasing the percentage of the population with a college credential from 40% to 60%. This will require colleges and universities in the state to increase their annual production of degrees and certificates. As a member of Complete College America, the initiative has a common set of progress and outcome metrics and a dashboard to compare states and campuses. Other goals of Complete College Montana include implementing new funding models (tying college funding to outcomes); reducing the time to attaining a degree, creating incentives for full-time enrollment and utilizing incentive-based financial aid; transforming remediation by clarifying what constitutes college readiness and establishing a statewide approach; and restructuring academic delivery to meet the needs of today's students, including year-round attendance models.
- **Prior Learning Assessment** - is a tool for the Montana University System to increase access and promote college completion in a shortened timeframe for new and returning adult learners.
- **HealthCARE Montana** discretionary grant is another multi-partner initiative that is strengthening the two-year college system in the health care fields by improving training opportunities and developing relevant curriculum in the field and promoting successful health care employment for students, with particular attention to adult learners (especially in rural areas) and to veterans. **Alignment of Education, Workforce and Economic Development Montana** is committed to supporting efficient, effective and responsive delivery of educational programs that are designed to meet the needs of businesses. Several models are already in place; future plans to promote success through alignment include: Developing and implementing a statewide policy framework to align programs serving the needs of training providers, educational institutions and businesses; Supporting the Montana University System's efforts to win federal and private grants aimed at enhancing coordination between businesses and the educational system; Providing a continuum of training and credential opportunities that promote career advancement; Meeting local and unique training needs of high-demand industries, including health care, energy and technology.

The State will continue to look to organizations outside its Workforce Development System for opportunities to support local, business engaged, innovative workforce programs. The state also seeks to promote community colleges, two-year colleges and tribal colleges as essential local and regional suppliers of Montana's trained workforce. This will be accomplished through increasing the involvement of businesses in formal curriculum development and supporting continued expansion of comprehensive two-year education, with a focus on workforce development, access and academic progression. Job Service staff throughout the state are closely aligned with economic development entities through a variety of shared initiatives, promotion of new businesses and encouragement of entrepreneurship in industries that support

existing businesses. An important example of this work is the alignment of the Governor's Office of Economic Development, Montana Department of Commerce, Montana Economic Developers Association and DLI to provide a statewide Business Expansion and Retention program. The program involves volunteer community assessment teams that address the needs of local businesses, upon request.

Through integrated partnerships with business, education, community leaders and workforce programs, Montana has formed Community Management Teams (CMTs), which serve as the state's local workforce organizations. CMTs were originally developed as a group of One- Stop partners, community members, local businesses, economic development representatives and other interested parties. The groups have elected officers and meet on a monthly or quarterly basis, as determined by each CMT. The CMTs identify their community's needs and work together to plan needed workforce development and other partner services. CMTs are organized around each of Montana's certified One-Stop Centers to address the needs of the population within Montana's vast geographic expanse. Montana currently has CMTs in communities throughout the state. The CMTs will provide the local, community voice to the State Workforce Innovation Board (SWIB).

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

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The Unified or Combined State Plan must include assurances that—

1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;    Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State boards and local boards, such as data on board membership and minutes;    Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;    Yes
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administering the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;    Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;    Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);    Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;    Yes
8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;    Yes

9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;   Yes

10. The State has a One-Stop certification policy that ensures the physical and programmatic accessibility of all One-Stop centers with the Americans with Disabilities Act of 1990 (ADA);   Yes

11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and   Yes

12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.   Yes



## VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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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.

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

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

## A. GENERAL REQUIREMENTS

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### 1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

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

Montana has in the past and continues to operate as a single workforce area with one planning region. 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 more closely together than ever to ensure that services are coordinated and aligned, including participation in partners' conferences and joint strategy-planning activities.

MT consulted with the SWIB and it was determined to use the existing single area planning region as had been established. Local elected officials are represented on the SWIB.

Additionally, as Montana worked to understand, engage on and ultimately resolve its CEP/BOS issues, letters were sent to and conversations were had with many CEO's regarding establishing new and/or maintaining current local area designations. Ultimately it was determined by all involved that existing boundaries would be retained. However, CEOs and other interested parties are aware of their rights and the process to request that new areas be considered, if they at any point so choose, per issuance of updated State policy in May 2016.

Finally, some local workforce activities are coordinated through the Montana Association of Counties (MACo) Districts (there are 12 MACo districts across the state, and lead local officials are encouraged to attend Community Management Team (CMT) meetings in their jurisdiction.

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

Montana has in the past and continues to operate as a single workforce area with one planning region.

DLI engaged with local chief elected officials via phone calls and written letters to understand their thoughts and determine the need and interest in continuing to operate a Concentrated Employment Program (CEP) local area and a Balance of State (BOS) local area. Per those discussions, all parties agreed that there was no interest in continuing that model at this time and that the state is best served by operating as a single workforce area. However, per WIOA regulations and state-issued workforce policy, the option to request establishment of a local area is available should that need, or desire arise in the future. Additionally, DLI continues to work with USDOL to fully and correctly understand, define and document its single workforce area structure.

**C. PROVIDE THE APPEALS PROCESS REFERRED TO IN SECTION 106(B)(5)  
OF WIOA RELATING TO DESIGNATION OF LOCAL A R E A S .**

WIOA formally reauthorized the expired Workforce Investment Act of 1998 and removed the Concentrated Employment Program provision of the law, automatically making Montana a single workforce area for the purposes of administering WIOA. WIOA Section 106 requires the state to provide notice of and the opportunity for entities to request initial or general designation as a local workforce area. At the time of submission of this plan, Montana had received no such requests or public comments speaking to this opportunity. As such, Montana will continue to operate as a single area planning state unless and until such a request is received. DLI is designated as the single administrative entity, grant recipient and fiscal agent for WIOA Title I funds. The SWIB provides oversight of the statewide system and has provided input into this statewide Combined WIOA Plan. DLI maintains the statewide management information and financial system for WIOA, to eliminate duplicative administrative costs and to promote the efficient use of resources within the workforce system.

Pending implementation of WIOA Final Rules, the State will issue updated guidance on the Appeals process for designation of local areas and determination of infrastructure funding. Montana continues to work with USDOL to understand and finalize terminology and definitions around it being a single area planning state.

**D. PROVIDE THE APPEALS PROCESS REFERRED TO IN SECTION  
121(H)(2)(E) OF WIOA RELATING TO DETERMINATIONS F O R  
INFRASTRUCTURE FUNDING.**

The appeals process established by Montana for infrastructure funding is as follows:

- a. 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.
  - i. Step 1: Notice of Failure to Reach Consensus Given to Governor: If the parties cannot reach consensus on methods of sufficiently funding an AJC’s infrastructure costs and the amounts to be contributed by each partner program, the SWIB (or designee) is required to notify the Governor.
  - ii. 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:
    - 1. The State Plan;
    - 2. The cost allocation methodology or methodologies proposed by the partners to be used in determining the proportionate share;
    - 3. The proposed amounts or budget to fund infrastructure costs;
    - 4. The amount of partner funds included;
    - 5. 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);

6. Any proposed or agreed on AJC budgets (for individual centers or a network of centers); and
7. 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.

iii. Step 3: Governor Determinations and Calculations: The Governor will:

1. Determine AJC infrastructure budget(s);
2. Establish cost allocation methodology(s);
3. Determine Partners' proportionate shares;
4. Calculate statewide cap;
5. Assess the aggregate total of infrastructure contributions as it relates to the statewide cap; and
6. 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.

iv. 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 OR GUIDANCE FOR THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM AND FOR USE OF STATE FUNDS FOR WORKFORCE INVESTMENT ACTIVITIES.

The state WIOA unit within DLI provides technical assistance and training to all WIOA case managers, including ongoing technical assistance and one formal, three-day training session each year. In 2015, staff from Adult Education, the Department of Public Health and Human Services, and two-year colleges participated in the training; it is anticipated that this approach of including partners in formal WIOA training will continue. The WIOA unit also hosts at least two new Case Manager training sessions in-person each year. This provides the opportunity to train new case managers on the programs and on the operation of the MontanaWorks data system. The Governor's set aside funds are used for overall program operations to enhance the quantity and quality of services to businesses and job seekers throughout the state. Set aside funds will also be used for oversight staff in the administration of the required activities, as described in WIOA Regulation 20CFR Part 682.200, including:

- Administering and monitoring the WIOA program
- Maintaining the Eligible Training Provider List, along with maintaining performance information and information on the cost of attendance (including tuition and fees)
- A list of eligible providers of youth activities
- Providing technical assistance in carrying out WIOA activities
- Operating a fiscal and management accountability information system, and
- Performance measure data collection

The set aside funding is also used for SWIB operations and board staff. There are currently no other allowable statewide employment activities underway at this time; however, the increase in the set aside funding will allow the SWIB and the Governor to explore options in providing new statewide employment and training opportunities. DLI's Job Service Operations Bureau receives Rapid Response funding to provide those services to businesses and the affected workers through the statewide network of 23 local Job Service offices. Local Job Service staff coordinate all the Rapid Response activities and, when

needed, bring a variety of state and local service providers together for interagency Rapid Response workshops. Layoff aversion assistance is provided through the Business Expansion and Retention (BEAR) program, which is available statewide through joint ventures between Job Service offices and local economic development entities. BEAR provides early identification of businesses at risk of layoffs and assessment of the needs and options available to them. In the event of a natural disaster, 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. In Montana, trade-impacted workers receive Trade Adjustment Assistance (TAA) information and services through our Rapid Response, Dislocated Worker and Wagner-Peyser programs. These programs are operated by the Job Service Operations Bureau through the statewide network of 23 local Job Service offices. Local staff coordinate all the 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 training. In addition to structured interviews, case manager's use a variety of formal assessment tools, including (but not limited to): the Test of Adult Basic Education, Montana Career Information System tools and Prove It proficiency tests.

**B. DESCRIBE HOW THE STATE INTENDS TO USE GOVERNOR'S SET ASIDE FUNDING. DESCRIBE HOW THE STATE WILL UTILIZE RAPID RESPONSE FUNDS TO RESPOND TO LAYOFFS AND PLANT CLOSINGS AND COORDINATE SERVICES TO QUICKLY AID COMPANIES AND THEIR AFFECTED WORKERS. STATES ALSO SHOULD DESCRIBE ANY LAYOFF AVERSION STRATEGIES THEY HAVE IMPLEMENTED TO ADDRESS AT RISK COMPANIES AND WORKERS**

The Governor's set aside funds are used for overall program operations to enhance the quantity and quality of services to businesses and job seekers throughout the state. Set aside funds will also be used for oversight staff in the administration of the required activities, as described in WIOA Regulation 20CFR Part 682.200, including: Administering and monitoring the WIOA program Maintaining the Eligible Training Provider List, along with maintaining performance information and information on the cost of attendance (including tuition and fees) A list of eligible providers of youth activities Providing technical assistance in carrying out WIOA activities Operating a fiscal and management accountability information system, and Performance measure data collection The set aside funding is also used for SWIB operations and board staff. There are currently no other allowable statewide employment activities underway at this time; however, the increase in the set aside funding will allow the SWIB and the Governor to explore options in providing new statewide employment and training opportunities. DLI's Job Service Operations Bureau receives Rapid Response funding to provide those services to businesses and the affected workers through the statewide network of 16 local Job Service offices. Local Job Service staff coordinate all the Rapid Response activities and, when needed, bring a variety of state and local service providers together for interagency Rapid Response workshops. Layoff aversion assistance is provided through the Business Expansion and Retention (BEAR) program, which is available statewide through joint ventures between Job Service offices and local economic development entities. BEAR provides early identification of businesses at risk of layoffs and assessment of the needs and options available to them. In the event of a natural disaster, 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. In Montana, trade-impacted workers receive Trade Adjustment Assistance (TAA) information and services through our Rapid Response, Dislocated Worker and Wagner-Peyser programs. These programs are operated by the Job Service Operations Bureau through the statewide

network of 16 local Job Service offices. Local staff coordinate all the 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 training. In addition to structured interviews, case manager's use a variety of formal assessment tools, including (but not limited to): the Test of Adult Basic Education, Montana Career Information System tools and Prove It proficiency tests

**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 natural disaster, 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. The process for the Rapid Response Team is in the event of the need to provide Rapid Response services the Job Service Operations Bureau and/or local office staff will coordinate with the Rapid Response team to provide the information and services to the impacted workers. Team members are adjusted to meet the community and individual needs of the impacted workers. For an example in the case of a natural disaster FEMA may include with the core group.

**D. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) TO WORKER GROUPS ON WHOSE BEHALF A TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED. (SECTION 134(A)(2)(A).) THIS DESCRIPTION MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE TRADE-AFFECTED WORKERS IN THE GROUPS IDENTIFIED IN THE TAA PETITIONS WITH AN ACCURATE UNDERSTANDING OF THE PROVISION OF TAA BENEFITS AND SERVICES IN SUCH A WAY THAT THEY ARE TRANSPARENT TO THE TRADE-AFFECTED DISLOCATED WORKER APPLYING FOR THEM (TRADE ACT SEC. 221(A)(2)(A) AND SEC. 225; GOVERNOR-SECRETARY AGREEMENT). DESCRIBE HOW THE STATE WILL USE FUNDS THAT HAVE BEEN RESERVED FOR RAPID RESPONSE TO PROVIDE SERVICES FOR EVERY WORKER GROUP THAT FILES A TAA PETITION.**

In Montana, trade-impacted workers receive Trade Adjustment Assistance (TAA) information and services through our Rapid Response, Dislocated Worker and Wagner-Peyser programs. These programs are operated by the Job Service Operations Bureau through the statewide network of 16 local Job Service offices. Local staff coordinate all the 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 training. In addition to structured interviews, case manager's use a variety of formal assessment tools, including (but not limited to): the Test of Adult Basic Education, Montana Career Information System tools and Prove It proficiency tests

Rapid Response services are provided to all work groups having layoffs. Once staff is aware of the TAA petition they will share the program information with the impacted workers by

providing a Rapid Response workshop. Staff will share standard Rapid Response information along with TAA program specific information. They provide the impacted workers with a TAA brochure along with discussing the program during the workshop. They will also mail the workers a letter after the workshop to remind them about what the TAA program has to offer and to contact our staff about participating in the program.



## B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS

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### 1. IF THE STATE IS UTILIZING WORK-BASED TRAINING MODELS (E.G. ON-THE-JOB TRAINING, INCUMBENT WORKER TRAINING, TRANSITIONAL JOBS, AND CUSTOMIZED TRAINING) AS PART OF ITS TRAINING STRATEGY AND THESE STRATEGIES ARE NOT ALREADY DISCUSSED IN OTHER SECTIONS OF THE PLAN, DESCRIBE THE STATE'S STRATEGIES FOR HOW THESE MODELS ENSURE HIGH QUALITY TRAINING FOR BOTH THE PARTICIPANT AND THE EMPLOYER.

Work-Based Training Models Training provided to Montanans using federal WIOA funds must be in high-wage/high-demand occupations, as determined by state labor market information. On-the-job training (OJT) contracts are developed at the local level. They are the result of the relationship between Job Service staff, other WIOA providers and the business. The business is screened prior to establishing the OJT contract, to ensure the job provides a wage that meets the client's needs and to ensure the business 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 client's current level of skill in that occupation. The assessment also evaluates whether the OJT job requires high-skills and will provide a living wage for the trainee. OJT contracts are not written for low-skilled jobs that do not provide additional career opportunities in the future. The Incumbent Worker Training Program is a competitive grant program that provides funding to help eligible Montana small businesses purchase training for their current (incumbent) workforce. The program also helps preserve existing jobs for Montana residents. Training can be customized to meet specific business 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 to remain competitive in their industry or the global economy.

### 2. DESCRIBE HOW THE STATE WILL INCORPORATE REGISTERED APPRENTICESHIP INTO ITS STRATEGY AND SERVICES.

Montana's Registered Apprenticeship (RA) program currently includes 67 occupations, 800 businesses and approximately 1,400 apprentices. The RA State Director works with Job Service staff and community-based organizations to ensure they are aware of apprenticeship opportunities in their area of the state and efforts are underway to develop linkages across the databases to further this communication. The State Director is also establishing connections with WIOA, and coordinates with the youth Jobs for Montana' Graduates program, as well as Youth Build and high school pre-apprenticeship programs.

Registered Apprenticeship, under the umbrella of Work Based Learning, is a cornerstone of Montana's workforce development and service delivery strategy and serves as the primary competency training model for all types and sizes of business. Montana is projecting a worker shortage in the coming years, but with plenty of jobs, competency and credential based trainings that enable businesses to truly develop a workforce is a key to success. In the next two years Montana plans to transform its Registered Apprenticeship (RA) unit into a Work Based Learning (WBL) unit that encompasses RA and supports local Job Service staff as they market RA and WBL as a workforce training solution for all levels and types of occupations.

### 3. PROVIDE THE PROCEDURE, ELIGIBILITY CRITERIA, AND INFORMATION REQUIREMENTS FOR DETERMINING TRAINING PROVIDER INITIAL AND CONTINUED ELIGIBILITY, INCLUDING REGISTERED APPRENTICESHIP PROGRAMS (WIOA SECTION 122).

Determining provider eligibility for the Eligible Training Provider (ETP) List is carried out at the state level. Training providers applying for initial program eligibility must provide the following information to be considered for Montana's ETP: 1. A description of each program of training services to be offered; Information on cost of attendance, including costs of tuition and fees; Whether the training program leads to an industry-recognized certificate or credential, including recognized post-secondary credentials; Whether the certificate or credential can be stacked with other credentials over time as part of a sequence to move an individual along a career pathway or up a career ladder; Whether the provider has developed the training in partnership with a business and if so, which business; Which in-demand industry sectors and occupations best fit with the training program; A description of the prerequisites or skills and knowledge required prior to the commencement of training; Once the application is submitted, the State will determine whether required information has been provided. If so, the Training Provider will be placed on Montana's Eligible Training Provider List. Training providers applying for continued eligibility will be required to apply after the first full fiscal year and every two years after that. Applications for continued eligibility must be submitted by December 1st for the year in which eligibility expires.

Applications for continued eligibility must show the training program is still authorized by the appropriate oversight agency to operate in Montana. The application must include the following (in addition to updating the information provided for initial eligibility): 2. The total number of clients enrolled in the program; The total number of clients completing the program; The total number of clients exiting the program; Information on recognized post-secondary credential received by program clients; Information on the completion rate for such clients; Description of how the provider will ensure access to training services throughout the State, including rural areas and through the use of technology; Description of how the providers provide training services to individuals who are employed and/or individuals with barriers to employment; Information reported to State agencies on Federal and State training programs other than programs within WIOA title 1-B; and Social Security Numbers for all clients for the two previous years, regardless of funding source, which will be used to calculate the performance measures for the ETP. The calculation of these measures will be done by the State. The state is working directly with these providers to answer questions and help them submit subsequent eligibility applications. State staff have developed a mechanism by which Registered Apprenticeship sponsors are offered the opportunity to be included on the ETP list.

"Registered apprenticeship programs are not subject to the eligibility criteria or application requirements." While registered apprenticeship programs are automatically eligible, not all registered apprenticeship sponsors may wish to be included on the list. Registered apprenticeship programs are being given the option of being on Montana's ETP list. The State has developed a letter that will be sent to all Registered Apprenticeship sponsors telling them about the opportunity to be on the ETPL. In that letter, it states the Apprenticeship Sponsor (if they want to) will be placed on the ETPL and will remain there for 12 months. Each year following, they will be asked to verify their status that they would like to remain on the ETPL as a provider. If a response is not received or the sponsor does not wish to be on the list, they will not be placed on it. When new sponsors are set up with the State Registered Apprenticeship Program, part of the process will be to inform them of the ETP availability.

**4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR THE PRIORITY FOR PUBLIC ASSISTANCE RECIPIENTS, OTHER LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT IN ACCORDANCE WITH THE REQUIREMENTS OF WIOA SEC. 134(C)(3)(E), WHICH APPLIES TO INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES FUNDING BY THE ADULT FORMULA PROGRAM.**

In accordance with WIOA Section 134(c)(3)(E), Montana implemented the additional adult priority of service for individuals who are basic skills deficient in July 2015. Individuals applying for enrollment in the adult program under the priority of service for public assistance or low-income individuals must provide documentation verifying receipt of public assistance or low-income status. Individuals applying for WIOA enrollment using the basic skills deficient priority of service must provide documentation to verify they are basic skills deficient. There are two acceptable ways to verify that the applicant is basic skills deficient: 3. An original or copy of the Test of Adult Basic Education (TABE) that shows the test score; or Documentation from an Adult Basic Education and Learning Center that verifies the applicant is enrolled in ABE and is working with them to improve their basic reading, writing and math skills. WIOA Unit staff have been monitoring verification of public assistance and low-income status since implementation of the Workforce Investment Act. Monitoring for the additional WIOA adult priority of service began on July 1, 2015.

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 looking at documentation in client files that shows the person fits the priority for public assistance, other low-income individuals and individuals who are basic skills deficient. Montana policy states that WIOA Adults who receive individualized career and training services must have documentation proving the priority. State policy outlines the Priority of Service for Title 1 Adults and the only way someone can receive individualized career or training services is through meeting one of the categories for priority of service. 100% of WIOA Title 1 Adult clients meet one of the priority of service categories.

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

**Transfer Between Adult and Dislocated Worker Funding Streams**

The SWIB may direct the transfer of up to and including 100 percent of a program year allocation for adult or dislocated worker employment and training activities between the two programs, upon approval of the Governor, and based on a local needs assessment and performance indicators.

## C. YOUTH PROGRAM REQUIREMENTS

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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. \*

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

Montana is a single workforce area state. DLI follows the Department of Administration Procurement Bureau's Request for Proposal (RFP) process. The SWIB's ad hoc Youth Council developed the criteria for the selection of youth providers for the Program Year 2012 WIA RFP. The SWIB will consider the following criteria (at a minimum) for awarding contracts to youth service providers in the next round of Request for Proposals: 1. Agency profile and experience in providing services to disconnected youth 2. Demonstrated effectiveness: includes performance measures and goals accountability 3. Financial systems: description of the offeror's financial systems in place for fiscal control and accounting procedures that are in accordance with generally accepted accounting principles 4. Work plan and method of providing activities and services 5. Description of how the provider will ensure that WIOA youth services are provided to youth who are: a. In-school (attending any school, including secondary or post-secondary school), age 14–21, are low-income and have one or more WIOA barriers; and b. Out-of-School youth (not attending any school), not younger than 16 or older than age 24 at the time of enrollment and has one or more WIOA barriers.

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 Adult Basic Education, Vocational –Rehabilitation, Job Service Offices, juvenile justice and probation, public assistance programs including SNAP and TANF and post-secondary education. These partners are also members of the Community Management Teams (CMTs) established across Montana.

When youth providers develop worksites, it will be with the intention of ensuring that the worksite is in line with the youth's career path, that the youth is receiving quality training and that the work experience may lead to permanent employment for that youth whether it's with the same business or for another in that occupation.

Typically, the majority of out-of-school youth enrolled in the WIOA youth program have dropped out of school and need their high school diploma equivalency. All out-of-school youth are assessed for reading and math and when they have a basic skills deficiency they are referred to the Adult Basic Education center in their area for remediation. The WIOA provider and the ABE center will coordinate to determine the best approach for the youth's remediation efforts and help the youth identify a career pathway.

WIOA youth providers work with the alternative schools to help youth re-enter high school and obtain their diploma. During the assessment process an Individual Service Strategy is developed, and youth providers discuss options with youth that have dropped out of school. If the youth expresses an interest in returning to school but not the "traditional" high school the youth provider will work to coordinate the youth's re-entry to school.

WIOA youth providers coordinate services with Vocational Rehabilitation whenever the opportunity is presented. Youth with disabilities have benefited from services provided through both programs. Now with the emphasis on career pathways and ultimately employment there is need for more collaboration and coordination between the WIOA youth program and Vocational-Rehabilitation to ensure youth are competitively seek and obtain jobs with real pay with livable wages

Strategies for improving outcomes including how we will leverage and align the core programs, required and optional one-stop partner programs and other resources: Montana's strategies for improving outcomes for out-of-school youth include 1) Ongoing partnership building with the six core partners and required one-stop partner programs such as TANF, SNAP, Career and technical education programs, and other resources. At the State level, a State Agency Management Team (SAM) is being developed where lead state agency officials representing the WIOA core programs and mandatory partner programs such as TANF will meet quarterly, or more frequently if needed. The SAM team will have an expectation to share information regarding program efforts and effects, ensuring that efforts are coordinated, and coordinate economic development strategies with the Office of the Governor and other State Agencies. The Youth Advisory Council of the State Workforce Innovation Board will also be focusing on out-of-school youth outcomes and helping to develop strategies to improve outcomes to this population. At the Local level, Community Management Teams are functioning and it is an expectation that all core partners as well as mandatory partners and other community resource programs meet once a quarter to talk about strategies to improve outcomes. It is expected that agencies come together to collaborate services for the benefit of each out-of-school youth client. 2) A collaborative agreement between all core partners on service delivery is being signed and given to case managers, teachers, and counselors in the workforce system. This agreement was developed at the State level between agencies to provide a framework for service delivery. Having this agreement in place will show to the people working in the field that at the very top level, Montana is committed to a coordinated service delivery strategy. This will help with outcomes for our out-of-school youth population because it is the expectation that partners come together for service delivery and collaborate on what is available to each youth served.

### **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. \***

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



Montana's WIOA youth funding goes to youth providers in each of the Montana's Association of Counties (MACo) Districts. Montana determined that going through the Request for Proposal process for youth providers instead of bidding out each youth element better served Montana's rural nature and population of youth. WIOA youth providers are responsible for ensuring that all elements are made available to youth clients; however, they have the discretion of determining what specific elements may be provided based on the youth's individual objective assessment and the Individual Service Strategy. Montana youth service providers coordinate with partners in their areas, whenever possible, to coordinate and leverage funds to ensure youth are receiving the services they need. In some instances, youth elements such as Financial Literacy are provided by area Chambers of Commerce and/or banking entities at no charge to the WIOA program. Dropout prevention is another element that is provided to in-school youth through the Jobs for Montana's Graduates' program (where the program is available) at no cost to the WIOA program. WIOA youth service providers describe the method in which the youth will receive the required elements, whether it will be directly from the youth service provider or through a contract between the youth service provider and another entity, in the Provider Agreement Scope of Services. Montana conducts annual monitoring of youth service providers. The monitoring consists of a desk review of youth records in the management information system (MWorks) used by WIOA providers. Monitors review case notes for documentation and the MWorks employment plan, to ensure that the youth is receiving the appropriate services (e.g. the 14 elements that are included as services in MWorks) as described in the youth's Individual Service Strategy. Following the desk review, an onsite review is conducted to review youth files for documentation verifying the youth is receiving one or more youth elements. Records are also reviewed throughout the year in conjunction with the quarterly reports submitted by providers. Program elements that will be made available to all youth include: 1. Tutoring, study skills training and instruction leading to secondary school completion, including dropout prevention strategies 2. Alternative secondary school offerings 3. Paid and unpaid work experiences that have academic and occupational education as a component of the work experience, such as: a. Summer employment opportunities and other employment opportunities available throughout the school year b. Pre-apprenticeship programs c. Internships and job shadowing; and d. On-the-job training opportunities 4. Occupational skill training with priority consideration for training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations 5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster 6. Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors 7. Supportive services 8. Adult mentoring for the duration of at least 12 months. This may be provided both during and after program participation. 9. Follow-up services for not less than 12 months after the completion of participation 10. Comprehensive guidance and counseling, including drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth 11. Financial literacy education 12. Entrepreneurial skills training 13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services 14. Activities that help youth prepare for and transition to post-secondary education and training

**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).

- An Out-of-School Youth (OSY) is defined as:
  - Youth who is not attending any school, including youth in home schools that are not registered with the county superintendent;
  - Not younger than 16 nor older than 24 at the time of enrollment. Because age eligibility is based on age at enrollment, clients may continue to receive services beyond the age of 24 once they are enrolled in the program; and
  - One or more of the following:
    - A school dropout;
    - A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. School year calendar quarter is based on how a local school district defines its school year quarters.
    - A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either basic skills deficient or an English language learner;
    - An individual who is subject to the juvenile or adult justice system;
    - A homeless individual aged 16 to 24 which may include a runaway youth;
    - Youth in foster care or has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption;
    - A youth who is pregnant or parenting;
    - An individual with a disability; or
    - 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
      - 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; youth 16 and over and not attending school is considered to be a “drop-out”.



6. IF NOT USING THE BASIC SKILLS DEFICIENT DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INCLUDE THE SPECIFIC STATE DEFINITION.

#### D. SINGLE-AREA STATE REQUIREMENTS

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In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must 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 DISBURSAL 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).)

WIOA formally reauthorized the expired Workforce Investment Act of 1998 and removed the Concentrated Employment Program provision of the law, automatically making Montana a single workforce area for the purposes of administering WIOA. WIOA Section 106 requires the state to provide notice of and the opportunity for entities to request initial or general designation as a local workforce area. At the time of submission of this plan, Montana had received no such requests or public comments speaking to this opportunity. As such, Montana will continue to operate as a single area planning state unless and until such a request is received. DLI is designated as the single administrative entity, grant recipient and fiscal agent for WIOA Title I funds. The SWIB provides oversight of the statewide system and has provided input into this statewide Combined WIOA Plan. DLI maintains the statewide management information and financial system for WIOA, to eliminate duplicative administrative costs and to promote the efficient use of resources within the workforce system.

## E. WAIVER REQUESTS (OPTIONAL)

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

1. IDENTIFIES THE STATUTORY OR REGULATORY REQUIREMENTS FOR WHICH A WAIVER IS REQUESTED AND THE GOALS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, INTENDS TO ACHIEVE AS A RESULT OF THE WAIVER AND HOW THOSE GOALS RELATE TO THE UNIFIED OR COMBINED STATE PLAN;
2. DESCRIBES THE ACTIONS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, HAS UNDERTAKEN TO REMOVE STATE OR LOCAL STATUTORY OR REGULATORY BARRIERS;
3. DESCRIBES THE GOALS OF THE WAIVER AND THE EXPECTED PROGRAMMATIC OUTCOMES IF THE REQUEST IS GRANTED;
4. DESCRIBES HOW THE WAIVER WILL ALIGN WITH THE DEPARTMENT'S POLICY PRIORITIES, SUCH AS:
  - A. SUPPORTING EMPLOYER ENGAGEMENT;
  - B. CONNECTING EDUCATION AND TRAINING STRATEGIES;
  - C. SUPPORTING WORK-BASED LEARNING;
  - D. IMPROVING JOB AND CAREER RESULTS, AND
  - E. OTHER GUIDANCE ISSUED BY THE DEPARTMENT.
5. DESCRIBES THE INDIVIDUALS AFFECTED BY THE WAIVER, INCLUDING HOW THE WAIVER WILL IMPACT SERVICES FOR DISADVANTAGED POPULATIONS OR INDIVIDUALS WITH MULTIPLE BARRIERS TO EMPLOYMENT; AND
6. DESCRIBES THE PROCESS USED TO:
  - F. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;
  - G. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;
  - H. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;
  - I. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.
  - J. COLLECT AND REPORT INFORMATION ABOUT WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT

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

## TITLE I-B ASSURANCES

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The State Plan must include assurances that:

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

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## PROGRAM-SPECIFIC REQUIREMENTS FOR WAGNER-PEYSER PROGRAM (EMPLOYMENT SERVICES)

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

## A. EMPLOYMENT SERVICE PROFESSIONAL STAFF DEVELOPMENT.

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### 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. DLI provides webinars on timely subjects as they arise. Wagner–Peyser Job Service staff are cross–trained on all Wagner–Peyser programs. This maximizes scarce resources and ensures that job seekers and businesses receive the best possible services. Each office has subject matter experts who train each other and conduct cross–training in staff meetings. All staff are required to be proficient in WIOA program eligibility criteria and how to make appropriate referrals to partner agencies. When training needs are identified, especially with hard–to–place clients or in new areas that staff may lack expertise, specialized training is organized and delivered – either statewide or by specific request, depending on the extent of need. UI staff provide training to local RESEA staff on basic UI eligibility requirements, issue identification, fact–finding tools and UI work search requirements. Staff are also empowered to attend training outside the agency when it enhances their skills and knowledge to better serve job seekers or businesses. Montana supports all businesses by providing customized business services and working with businesses on work–based learning opportunities, on–the–job training and incumbent worker training. Montana will continue to work with businesses in the labor community, including the Montana Registered Apprenticeship Program administered by Montana Department of Labor & Industry. By supporting talent development through Apprenticeship, businesses gain a pipeline of loyal skilled workers, increased productivity, and they improve the bottom line. Montana will continue to look at opportunities that will help businesses increase productivity, employee engagement, and training by implementing new programs and pilot projects.

### 2. DESCRIBE STRATEGIES DEVELOPED TO SUPPORT TRAINING AND AWARENESS ACROSS CORE PROGRAMS AND THE UNEMPLOYMENT INSURANCE PROGRAM, AND THE TRAINING PROVIDED FOR EMPLOYMENT SERVICES AND WIOA STAFF ON IDENTIFICATION OF UI ELIGIBILITY ISSUES AND REFERRAL TO UI STAFF FOR ADJUDICATION.

Workforce Consultants must complete a training video annually on UI Availability. This training covers basic availability and eligibility for benefits, documentation requirements for UI, job attached, and union attached claimants and removing barriers for claimants.

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.

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Workforce Consultants throughout the statewide network of workforce centers are trained to provide general assistance and information to customers who have questions about filing a claim for unemployment compensation. This includes assistance other general unemployment insurance questions. Questions that require specific UI expertise are referred to UI for responses. Montana provides direct phone line access to a UI representative in all workforce center offices across the state. Additionally, UI has developed a UI4U website allows claimant customers to receive a contact back from a UI representative based on the most convenient time and method. Workforce representatives complete this for and provide details about the claimant's question for the UI representative to be prepared to assist this customer in a timely and effective manner.

C. DESCRIBE THE STATE'S STRATEGY FOR PROVIDING REEMPLOYMENT ASSISTANCE TO UNEMPLOYMENT INSURANCE CLAIMANTS AND OTHER UNEMPLOYED INDIVIDUALS.

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Job Service staff work with all Unemployment Insurance (UI) claimants, except for job-attached claimants. Claimants (other than job-attached workers) must register with the Job Service, within 10 days of filing their claims, as a condition of continuing to receive UI. Claimants have the option of registering with the Job Service online or visiting a Job Service office. Montana serves claimants in declining industries, ex-military claimants and those at risk of becoming long-term unemployed through the Reemployment Services and Eligibility Assessment (RESEA) program. The program, available in the 23 Job Service offices throughout the state, includes: an orientation to services available at the office; an assessment of knowledge, skills, abilities and barriers; provision of labor market information; development of an Individualized Employment Plan to support returning to work as quickly as possible; and, where needed, referral to training. The RESEA program integrates and leverages aligned Unemployment Insurance and workforce service resources within the department. Staff focus on providing career services that relate to the specific needs of each participating claimant. The assessment and follow-on referrals to reemployment services focus on identifying high-demand jobs and training opportunities available locally or regionally, that can lead to higher-paying, long-term jobs for UI claimants. Statewide delivery of intensive, personalized reemployment services result in shorter UI benefits 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. Each RESEA appointment consists of a one-on-one assessment with a trained RESEA agent. Staff conduct a UI eligibility review with the claimant, provide relevant labor market and career information, ensure the claimant is registered with the Job Service, help the claimant develop a reemployment plan and refer the individual to at least one reemployment service, based on the individual's needs. The Workforce Services Division staff at the Job Service offices are trained to identify UI eligibility issues that may allow for early identification of improper unemployment payments and communicate those to UI staff. Additionally, staff assess each RESEA claimant's job readiness and barriers to reemployment. Case notes recorded in the Montana Works database document fact-finding on UI issues and are available to UI staff for further fact-finding and adjudication. All other claimants without job attachment or in agency-approved training receive a brief, one-on-one orientation to reemployment services to learn about the reemployment and training resources available to them. This is referred to as the "100% program," reflecting the fact that all claimants without a clear prospect of returning to work are supported in their job search efforts. The RESEA and 100% program activities focus on identification of local or regional jobs and high-demand training opportunities. Claimants may also receive comprehensive, specialized assessments and referral to Adult Basic Education, Job Corps, Apprenticeship programs or on-the-job training. Job Service staff interview claimants to probe for issues on their UI claims, to assess job readiness and to search for barriers to employment. Case notes recorded in MontanaWorks document fact-finding on issues.

These notes are available to UI staff for additional fact-finding and adjudication. Several self-service resources are available to job seekers online. The MontanaWorks system includes the RESEA Assessment Survey, a tool to develop an Individual Employment Plan, career information and job matching resources. Job seekers may also use the Montana Career Guide, mock interview activities, career planning activities and a pocket resume resource to help organize their information for job applications and interviews. The system is



designed for user–friendliness, with a drop-down menu of Services and Tasks from which customers can access the resources they need. Customers registered with MontanaWorks can view jobs and receive email notification of jobs that meet their skills and interest. Additionally, the Montana Career Information System (MCIS) provides many online assessments and resources for job seekers. MCIS 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, which helps job seekers quickly go through the career planning process to create an education and employment plan. Job Service, University, and community–based organization staff are trained to help clients navigate and interpret the results of their assessments. As noted earlier in the plan, DLI is working to develop an integrated work registration system. This will populate customer information across Employment Services and Unemployment Insurance databases and eliminate data duplication for customers and staff. DLI is also working continuously to improve workforce and UI program integration. In addition to those efforts reflected in the RESEA and 100% programs, 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 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 W-P FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN W-P AND UI, AS

APPROPRIATE, INCLUDING THE FOLLOWING:

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1. COORDINATION OF AND PROVISION OF LABOR EXCHANGE SERVICES FOR UI CLAIMANTS AS REQUIRED BY THE WAGNER-PEYSER ACT;

RESEA/100% appointments provide coordination and provision of labor exchange services through Job Service Montana offices.

W-P 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 businesses 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.

W-P funds will be used to administer the work test for the State unemployment compensation system; 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;

Montana requires in our State law that UI claimants register with their Job Service Offices. Job Service staff work with all Unemployment Insurance (UI) claimants, except for job-attached claimants. Claimants (other than job-attached workers) must register with the Job Service, within 10 days of filing their claims, as a condition of continuing to receive UI. Claimants have the option of registering with the Job Service online or visiting a Job Service office.

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

Montana serves claimants in declining industries, ex-military claimants and those at risk of becoming long-term unemployed through the Reemployment Services and Eligibility Assessment (RESEA) program. The program, available in the 16 Job Service offices throughout the state, includes: an orientation to services available at the office; an assessment of knowledge, skills, abilities and barriers; provision of labor market information; development of an Individualized Employment Plan to support returning to work as quickly as possible; and, where needed, referral to training. The RESEA program integrates and leverages aligned Unemployment Insurance and workforce service resources within the department. Staff focus on providing career services that relate to the specific needs of each participating claimant. The assessment and follow-on referrals to reemployment services focus on identifying high-demand jobs and training opportunities available locally or regionally, that can lead to higher-paying, long-

term jobs for UI claimants. Statewide delivery of intensive, personalized reemployment services result in shorter UI benefits 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 .

As noted earlier in the plan, DLI is working to develop an integrated work registration system. This will populate customer information across Employment Services and Unemployment Insurance databases and eliminate data duplication for customers and staff. DLI is also working continuously to improve workforce and UI program integration. In addition to those efforts reflected in the RESEA and 100% programs, 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 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.

Specific assessment protocols are in place in each local Job Service office that provide:

- \* guidance to local Job Service office staff as to the barriers and needs of the individual
- \* insight into the employment and career goals of the individual
- \* a basis for referral(s) to appropriate One Stop partners including WIOA education and training programs

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--

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1. ASSESSMENT OF NEED

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

The Value of Agricultural Production In 2014 agriculture generated \$4.4 billion in income on 27,800 farms and ranches in Montana, making it Montana's largest industry. A comparison of selected Montana industries shows agriculture continues to outpace all other industry sectors. The 2014 value of crop production decreased to \$2.2 billion, a decrease of \$360.4 million or 14% below 2013. The value of livestock increased in 2014 to \$2.2 billion, up \$487.2 million from 2013. When comparing major industrial sectors in Montana, receipts were mixed compared to a year ago. Agriculture showed a 1% decrease, down \$43.1 million from 2013. In 2014 crop production accounted for 50.3% of total agricultural production in Montana. By commodity group, food grains were valued at \$1.25 billion in 2014, which is 56% of the total value of the state's crop production. Feed crops were valued at \$659 million in Montana, comprising 29% of the crop production in 2014. Oil crops, fruits and tree nuts, vegetables and other crops made up another \$359 million or 15% in crop value for 2014. The value of livestock production in Montana accounted for approximately half (49.6%) of total agricultural production for 2014. Meat animals were valued at \$2.1 billion, which accounts for 95% of the total value of the state's livestock production. Poultry and eggs, dairy products, wool, honey and miscellaneous livestock make up 4.6% or \$193 million of value in livestock production for 2014.

On an individual commodity basis, cattle and calves were Montana's most valuable commodity in 2014, with cash receipts totaling \$1.99 billion. Wheat was the second most valuable commodity totaling \$1.25 billion in cash receipts. A distant third for 2014 cash receipts is hay, at \$3.9 million in Montana. Four of the six major livestock products in Montana for 2014 increased in value from the prior year. Wool and honey saw slight decreases in their cash receipts for 2014 compared to 2013. Of the 11 major crops only three commodities: oil crops, lentils and sweet cherries had an increase in value from 2013. Wheat and livestock account for nearly three-fourths (71.9%) of the state's agricultural receipts according to data from the Montana field office of the National Agricultural Statistics Service. Montana became the leading producer of pea and lentil "pulse crops" four years ago, and has held that position since. Montana is ranked second in the nation for average farm size, barley, spring wheat, winter wheat, durum wheat, Austrian winter peas, safflower and flaxseed production. Finally, Montana is ranked third in the nation for all wheat production and canola production. Montana agriculture is becoming more diverse and continues to add value to products that are available both locally and globally. Increasing production of corn and soybean crops that have been genetically modified will continue to expand opportunities for Montana producers, but also will require more advanced planning. A majority of the nation's corn, soybeans and canola crops contain genes that confer herbicide resistance or defenses against insects. Coexistence between genetically modified, conventionally grown and organic crops requires that measures be taken to prevent comingling of GMO crops and identity-preserved or organically certified crops. Montana is

actively engaging in good neighbor efforts to avoid contamination and allowing each farmer to grow and market his or her desired products, which are often sold for a premium price.

The employment rates in agriculture are very difficult to predict due to consistent unknown factors inherent to crop production and, at times, livestock production. Crop production in Montana is affected by our short growing season. It is 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 during certain times of the year, weeded, fertilized and then harvested as they mature or ripen. Montana growers have employed a substantial number of seasonal farm workers who sometimes will move from farm to farm but most often workers will stay on with one business for the entire season.

Montana-based seasonal farm workers typically are employed for up to nine months of the year and often work in more than one type of production (both livestock and crops). The official estimates of agricultural 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 agricultural workers available in their areas. This results in a steadily increasing rate of using the foreign labor H-2A program. The 2012 Census of Agriculture shows that 23,199 individuals worked for 7,322 farm and/or ranch businesses in Montana. This 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 Montana migrant seasonal farm workers (MSFWs) is a Montana resident that does not travel significant distances for seasonal/temporary work, or is a year-round employee, and is English-speaking. Since 2012, Montana farm payrolls have been steady with slight decreases. According to the Quarterly Census of Employment and Wages, agriculture employment accounts for approximately 1% of the total workforce. Montana DLI has established three workforce regions. The agricultural jobs in Montana are not necessarily concentrated in regional pockets but are spread throughout the state. Although there is not a single region with a concentration of agricultural employment, one county, Beaverhead, in region 1 has a higher number of businesses utilizing farm workers. In the Occupational Employment Statistics (OES) survey conducted in Montana several farm labor categories were not surveyed; the Farmers, Ranchers, and Other Agricultural Manager and Animal Breeder categories. The three categories listed are historically the highest paid professions. From the information collected in the Montana 2014 OES survey, the First-line Supervisors of Farming, Fishing, and Forestry Workers category was the highest paid, earning \$38,650 annually on average. The next highest paid categories were Agricultural Workers, All Other (\$34,770); Farming, Fishing and Forestry Occupations (\$30,430), and Inspectors (\$29,720). The majority of Montana farm workers earn low wages. The average annual income for the Montana National Farmworker Jobs Program (NFJP) client is less than \$6,200 annually. Many basic family needs such as nutrition, housing, health care, child care and transportation are out of reach for farm worker families. Montana has two particularly labor-intensive crops; sweet cherries and huckleberries. The harvesting of these is done exclusively by hand picking. Both commodities are only produced during the summer season in Montana in Workforce Region 1. The Montana cherries growers produce primarily for the fresh market. Number of Migrant and Seasonal Farm Workers in Montana Estimates of agricultural employment in this report are derived from agricultural labor data that the Montana NFJP contractor (Rural Employment Opportunities) has provided to Montana Department of Labor. Given the crop cycle, demand for farm workers tends to be highly seasonal, with peak periods of demand often lasting for a short duration. As a result, high job turnover and worker mobility are distinguishing features of the agricultural labor market. Survey-based official employment estimates conducted by the DLI count permanent farm jobs and any jobs filled by MSFWs identified by businesses as working during the survey's reporting week. They do not necessarily count positions that are filled by MSFWs at other

times of the month or workers that the business brings on and doesn't report on tax roll and/or for Workman's Compensation and Unemployment Insurance. This report provides a best estimate of the number of MSFWs in Montana in 2014 since limitations on data availability preclude making a precise estimate. This best estimate references the Montana Department of Labor and Industry's Labor Day Report, 2012 Census of Agriculture and Rural Employment Opportunities. Given the lack of alternative or more up-to-date information, this report assumes that the observed relationship between the number of jobs and numbers of farm workers in 2012 has been constant, or little changed, over the last 4 years. Actual trends in the official agricultural employment data offer support for this assumption, including data from the economic rebound. Although displaying year-to-year variables, overall agricultural employment levels in Montana do not appear to have changed much over the last six years. The best estimate of MSFWs in Montana is 23,199. Barring any significant changes in crops and livestock production in Montana, the estimated numbers of MSFWs in Montana are expected to remain near these same levels over the next year.

A. AN ASSESSMENT OF THE AGRICULTURAL ACTIVITY IN THE STATE MEANS: 1) IDENTIFYING THE TOP FIVE LABOR-INTENSIVE CROPS, THE MONTHS OF HEAVY ACTIVITY, AND THE GEOGRAPHIC AREA OF PRIME ACTIVITY; 2) SUMMARIZE THE AGRICULTURAL EMPLOYERS' NEEDS IN THE STATE (I.E. ARE THEY PREDOMINANTLY HIRING LOCAL OR FOREIGN WORKERS, ARE THEY EXPRESSING THAT THERE IS A SCARCITY IN THE AGRICULTURAL WORKFORCE); AND 3) IDENTIFYING ANY ECONOMIC, NATURAL, OR OTHER FACTORS THAT ARE AFFECTING AGRICULTURE IN THE STATE OR ANY PROJECTED FACTORS THAT WILL AFFECT AGRICULTURE IN THE STATE.

Refer to 1. Assessment of need

Top five labor-intensive crops are Spring Wheat at 104,300,000 bushels; Winter Wheat at 91,840,000 bushels; Canola at 84,180,000; Barley at 44,660,000 and Safflower at 42,420,000. Information from:

[https://www.nass.usda.gov/Statistics\\_by\\_State/Montana/Publications/Annual\\_Statistical\\_Bulletin/2015/Montana\\_Annual\\_Bulletin\\_2015.pdf](https://www.nass.usda.gov/Statistics_by_State/Montana/Publications/Annual_Statistical_Bulletin/2015/Montana_Annual_Bulletin_2015.pdf)

B. AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS MEANS SUMMARIZING MIGRANT AND SEASONAL FARM WORKER (MSFW) CHARACTERISTICS (INCLUDING IF THEY ARE PREDOMINANTLY FROM CERTAIN COUNTRIES, WHAT LANGUAGE(S) THEY SPEAK, THE APPROXIMATE NUMBER OF MSFWs IN THE STATE DURING PEAK SEASON AND DURING LOW SEASON, AND WHETHER THEY TEND TO BE MIGRANT, SEASONAL, OR YEAR-ROUND FARMWORKERS). THIS INFORMATION MUST CONSIDER DATA SUPPLIED BY WIOA SECTION 167 NATIONAL FARMWORKER JOBS PROGRAM (NFJP) GRANTEES, OTHER MSFW ORGANIZATIONS, EMPLOYER ORGANIZATIONS, AND STATE AND/OR FEDERAL AGENCY DATA SOURCES SUCH AS THE U.S. DEPARTMENT OF AGRICULTURE AND THE U.S. DEPARTMENT OF LABOR (DOL) EMPLOYMENT AND TRAINING ADMINISTRATION.

Refer to 1. Assessment of need

From October 1, 2015 through June 30, 2016, 575 H2A workers were certified to work in Montana for 223 unique businesses. The most common countries of origin of the H2A workers in Montana are Mexico, Peru and South Africa. The languages spoken by these

individuals are Spanish and Afrikaans although most are bilingual.  
<https://www.foreignlaborcert.doleta.gov/performance/data.cfm>

## 2. OUTREACH ACTIVITIES

### A. CONTACTING FARMWORKERS WHO ARE NOT BEING REACHED BY THE NORMAL INTAKE ACTIVITIES CONDUCTED BY THE EMPLOYMENT SERVICE OFFICES.

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

Outreach Activities Montana has a working partnership with the Montana NFJP grantee, Rural Employment Opportunities (REO) as well as with Migrant Education. DLI actively collaborates in outreach efforts with these organizations. REO is the WIOA Section 167 grantee in Montana and has field staff deployed around the state. In that capacity, REO has separate reporting and tracking requirements to the National Farmworker Jobs Program. REO has four field offices around the state. Two of these are co-located in the Job Service offices. The other two field offices that are not co-located in the Job Services partner closely with the office in their respective areas. The agreements between these agencies require coordinated services, including outreach activities. The 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 Job Service offices or community-based organizations for further services. The REO staff also conduct outreach to businesses on a regular basis, resulting in paid OJT and work experience opportunities for qualifying MSFWs. Through this partnership, Montana has been able to reach and serve members of the agricultural community who are otherwise not reached by workforce staff. REO provides employment and training options/funding to MSFWs around the state and to their qualifying dependents. 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. Individuals are referred for additional services to Job Service offices or community based organizations.

REO, in partnership with the Montana Food Bank, provides food and gas assistance to MSFWs traveling in both Eastern and Western migrant streams. 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. DLI and REO have a Memorandum of Understanding (MOU) in place. This MOU contains elements of annual joint outreach training opportunities and staff meetings, information-sharing between the partners regarding MSFW services, and collaboration on special projects and training. The Job Service expects to assign at least 876 hours of staff time to outreach in the next year. 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 (Food Stamps) and TANF (cash assistance) public assistance office, upcoming opportunities for occupational trainings, contact information for the local migrant council, 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 if housing is needed. There are 27 outreach workers located in Job Service offices throughout the state who conduct a variety of MSFW outreach activities year-round. Outreach workers spend time in the service area contacting, explaining and encouraging MSFWs to use the services and resources available at the office. The outreach workers find MSFWs throughout the state, especially in rural areas where they live, work, and gather, such as markets, parks and other locations.



The many 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, Job Service offices, public and private community agencies, MSFW groups and businesses 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 MontanaWorks system registration, resume, job applications and other documents as needed Providing assistance with obtaining unemployment insurance benefits, information on the UI4U web site, and referrals to specific employment opportunities if MSFWs are unemployed Making referrals to supportive services which MSFWs and their family members may be eligible to receive Providing information regarding current and future employment opportunities which may be available; this includes posting job orders and informing MSFWs about available H-2A job orders Informing MSFWs of the full range of available services, including job training opportunities available through Job Service offices and the local community-based organizations Informing MSFWs about the Job Service complaint system and providing assistance with filing and processing complaints In addition, information from WIOA Section 167 partners located in Job Service offices throughout the state is included to help MSFWs receive a comprehensive blend of core, intensive, and training services designed to place them into full-time, non-seasonal employment or upgraded agricultural employment. The outreach workers are also heavily engaged in the recruitment efforts of domestic workers to H-2A job vacancies. These activities include: Performing various recruitment activities, including outreach, to find and refer qualified domestic workers in order to fill H-2A job openings Encouraging agricultural businesses to use the Agricultural Recruitment System for publishing job openings to fill their job openings locally and/or through the H-2A program, if necessary Conducting follow up contacts with domestic employees that were either referred to or applied to an H-2A job posting through the Job Service REO, as a partner in this effort, provides supportive services (gas and food) to qualifying H-2A workers The data gathered by the outreach workers on the number of MSFWs contacted through outreach activities and by other agencies in the area are recorded and submitted to the Monitor Advocate in the central office. The Monitor Advocate works directly with the Job Service offices to ensure that these sites are in compliance with federal mandates and Montana Workforce Services Division policies and procedures.

Montana continues to partner with Rural Employment Opportunities, Migrant Education and the local Migrant Councils to assist in overcoming barriers and in providing services to the MSFWs. The required number of MSFW contacts by outreach staff per day, according Department of Labor guidelines, is a minimum of five contacts per eight hours worked. The outreach staff that are assigned to each Job Service office are not full-time outreach staff. Each of these staff members has several duties that must be met each day.

**B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH WORKERS. TECHNICAL ASSISTANCE MUST INCLUDE TRAININGS, CONFERENCES, ADDITIONAL RESOURCES, AND INCREASED COLLABORATION WITH OTHER ORGANIZATIONS ON TOPICS SUCH AS ONE-STOP CENTER SERVICES (I.E. AVAILABILITY OF REFERRALS TO TRAINING, SUPPORTIVE SERVICES, AND CAREER SERVICES, AS WELL AS SPECIFIC EMPLOYMENT OPPORTUNITIES), THE EMPLOYMENT SERVICE COMPLAINT SYSTEM, INFORMATION ON THE OTHER ORGANIZATIONS SERVING MSFWs IN THE AREA, AND A BASIC SUMMARY OF FARMWORKER RIGHTS, INCLUDING THEIR RIGHTS WITH RESPECT TO THE TERMS AND CONDITIONS OF EMPLOYMENT.**

Refer to 2A. Outreach Activities

Technical assistance provided to outreach workers will include small group training sessions at the local office level or yearly conferences with presentations concerning technical issues for all staff involved in outreach endeavors. Additional technical and computer resources will



be offered to local office staff and WIOA partners. This collaboration with other organizations will offer informational resources through technical assistance to one-stop center services via information accessible to job seekers and MSFWs offering a basic summary of farmworker rights and how to understand the terms and conditions of employment being offered.

**C. INCREASING OUTREACH WORKER TRAINING AND AWARENESS ACROSS CORE PROGRAMS INCLUDING THE UNEMPLOYMENT INSURANCE (UI) PROGRAM AND THE TRAINING ON IDENTIFICATION OF UI ELIGIBILITY ISSUES.**

Refer to 2A. Outreach Activities

Increasing outreach worker training and awareness across core programs including the Unemployment Insurance program and the training on identification of UI eligibility issues through technical training modules and small group training sessions.

**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.**

Refer to 2A. Outreach Activities

State merit staff outreach workers will be offered professional development activities to ensure they are able to provide high quality services to both jobseekers and businesses through training conducted via PowerPoint Presentations, Conferences and Telephone Conferencing.

**E.COORDINATING OUTREACH EFFORTS WITH NFJP GRANTEEES AS WELL AS WITH PUBLIC AND PRIVATE COMMUNITY SERVICE AGENCIES AND MSFW GROUPS.**

Refer to 2. Outreach Activities

**3. SERVICES PROVIDED TO FARMWORKERS AND AGRICULTURAL EMPLOYERS THROUGH THE ONE-STOP DELIVERY SYSTEM.**

Describe the State agency's proposed strategies for:

**(A) PROVIDING THE FULL RANGE OF EMPLOYMENT AND TRAINING SERVICES TO THE AGRICULTURAL COMMUNITY, BOTH FARMWORKERS AND AGRICULTURAL EMPLOYERS, THROUGH THE ONE-STOP DELIVERY**

**SYSTEM. THIS INCLUDES:**

- XI. HOW CAREER AND TRAINING SERVICES REQUIRED UNDER WIOA TITLE I WILL BE PROVIDED TO MSFWs THROUGH THE ONE-STOP CENTERS;**
- XII. HOW THE STATE SERVES AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH SERVICES.**

Services Provided to Farmworkers and Agricultural Businesses through One-Stop Centers  
Services Provided to MSFWs through the One-Stop System Montana is required to make

the services of the Job Service offices available to all job seekers, including MSFWs, in an equitable manner. Each Job Service office 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 from Job Service offices, including all other DOL-funded WIOA services, must be 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.

The Montana Workforce Services Division recognizes the importance of the agricultural industry in Montana and has devoted resources to meet the labor needs of agricultural businesses 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 Job Service offices provide customized services to businesses on an individual and as

needed basis. These services are in addition to the MontanaWorks 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 businesses, and tracking referrals made to job openings. Outreach workers also provide the following service to agricultural businesses:

Perform recruitment activities to find and refer qualified MSFWs to fill the labor needs of agricultural businesses

Encourage agricultural businesses 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

Provide Rapid Response services due to planned closure or mass layoffs. Additionally, REO provides businesses with reimbursement of up to 75% of a client's wages during a contracted work experience or OJT.

#### **(B) MARKETING THE EMPLOYMENT SERVICE COMPLAINT SYSTEM TO FARMWORKERS AND OTHER FARMWORKER ADVOCACY GROUPS.**

Refer to 3. Services provided to farmworkers and agricultural businesses through the one-stop delivery system part a

Marketing the Employment Service Complaint System written materials, posters and verbal communication particularly in areas farmworkers gather such as community picnics, churches and other community events.

#### **(C) MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.**

Refer to 3. Services provided to farmworkers and agricultural businesses through the one-stop delivery system part a

### **4. OTHER REQUIREMENTS**

#### **(A) COLLABORATION**

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

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 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). 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.

There will be increased collaboration with our existing partner, the NJP Grant Holder, REO, through the MOU signed by both parties. Additional partnerships will be sought with Montana Migrant Council and Montana Legal Services Association, both farmworker advocacy groups.

### (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 business 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 business organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP. The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural business organizations and other interested business organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

See APPENDIX 4 for public comment.

### (C) DATA ASSESSMENT.

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services to meet such goals.

Montana has consistently met five of the five equity ratio indicators during PY 2013–2014 and has been making steady improvement in meeting the minimum service level indicators from three of the seven to currently meeting five of the seven service level indicators. To ensure that all equity indicators will be met going forward, the Monitor Advocate has begun conducting annual programmatic reviews of all 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. If the Monitor Advocate identifies a finding, a Corrective Action Plan is requested, and the Monitor Advocate follows up with each Job Service site to ensure that the Corrective Action Plan is being implemented appropriately and is brought into full compliance.

## (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.

In 2014 agriculture generated \$4.4 billion in income on 27,800 farms and ranches in Montana, making it Montana's largest industry. A comparison of selected Montana industries shows agriculture continues to outpace all other industry sectors. The 2014 value of crop production decreased to \$2.2 billion, a decrease of \$360.4 million or 14% below 2013. The value of livestock increased in 2014 to \$2.2 billion, up \$487.2 million from 2013. When comparing major industrial sectors in Montana, receipts were mixed compared to a year ago. Agriculture showed a 1% decrease, down \$43.1 million from 2013. In 2014 crop production accounted for 50.3% of total agricultural production in Montana. By commodity group, food grains were valued at \$1.25 billion in 2014, which is 56% of the total value of the state's crop production. Feed crops were valued at \$659 million in Montana, comprising 29% of the crop production in 2014. Oil crops, fruits and tree nuts, vegetables and other crops made up another \$359 million or 15% in crop value for 2014. The value of livestock production in Montana accounted for approximately half (49.6%) of total agricultural production for 2014. Meat animals were valued at \$2.1 billion, which accounts for 95% of the total value of the state's livestock production. Poultry and eggs, dairy products, wool, honey and miscellaneous livestock make up 4.6% or \$193 million of value in livestock production for 2014.

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Cash Receipts – 2014

The employment rates in agriculture are very difficult to predict due to consistent unknown factors inherent to crop production and, at times, livestock production. Crop production in Montana is affected by our short growing season. It is 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 during certain times of the year, weeded, fertilized and then harvested as they mature or ripen. Montana growers have employed a substantial number of seasonal farm workers who sometimes will move from farm to farm but most often workers will stay on with one business for the entire season.

Montana-based seasonal farm workers typically are employed for up to nine months of the year and often work in more than one type of production (both livestock and crops). The official estimates of agricultural 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 agricultural workers available in their areas. This results in a steadily increasing rate of using the foreign labor H-2A program. The 2012 Census of Agriculture shows that 23,199 individuals worked for 7,322 farm and/or ranch businesses in Montana. This estimate of agricultural workers shows little change between the peak season and low season, as most agricultural workers for Montana are not a migrant community. The predominant demographic of Montana migrant seasonal farm workers (MSFWs) is a Montana resident that does not travel significant distances for seasonal/temporary work, or is a year-round employee, and is English-speaking. Since 2012, Montana farm payrolls have been steady with slight decreases.

According to the Quarterly Census of Employment and Wages, agriculture employment accounts for approximately 1% of the total workforce. Montana DLI has established three workforce regions. These regions are displayed in Figure 1.

The agricultural jobs in Montana are not necessarily concentrated in regional pockets but are spread throughout the state. Although there is not a single region with a concentration of agricultural employment, one county, Beaverhead, in region 2 has a higher number of businesses utilizing farm workers. Table 3 shows the mean and median wages of agricultural occupations in Montana in 2014. This information was obtained from the Research & Analysis Bureau's Occupational Employment Statistics.

In the Occupational Employment Statistics (OES) survey conducted in Montana several farm labor categories were not surveyed; the Farmers, Ranchers, and Other Agricultural Manager and Animal Breeder categories. The three categories listed are historically the highest paid professions. From the information collected in the Montana 2014 OES survey, the First-line Supervisors of Farming, Fishing, and Forestry Workers category was the highest paid, earning \$38,650 annually on average. The next highest paid categories were Agricultural Workers, All Other (\$34,770); Farming, Fishing and Forestry Occupations (\$30,430), and Inspectors (\$29,720). The majority of Montana farm workers earn low wages. The average annual income for the Montana National Farmworker Jobs Program (NFJP) client is less than \$6,200 annually. Many basic family needs such as nutrition, housing, health care, child care and transportation are out of reach for farm worker families. Montana has two particularly labor-intensive crops; sweet cherries and huckleberries. The harvesting of these is done exclusively by hand picking. Both commodities are only produced during the summer season in Montana in Workforce Region

1. The Montana cherries growers produce primarily for the fresh market. Number of Migrant and Seasonal Farm Workers in Montana Estimates of agricultural employment in this report

are derived from agricultural labor data that the Montana NFJP contractor (Rural Employment Opportunities) has provided to Montana Department of Labor. Given the crop cycle, demand for farm workers tends to be highly seasonal, with peak periods of demand often lasting for a short duration. As a result, high job turnover and worker mobility are distinguishing features of the agricultural labor market. Survey-based official employment estimates conducted by the DLI count permanent farm jobs and any jobs filled by MSFWs identified by businesses as working during the survey's reporting week. They do not necessarily count positions that are filled by MSFWs at other times of the month or workers that the business brings on and doesn't report on tax roll and/or for Workman's Compensation and Unemployment Insurance. This report provides a best estimate of the number of MSFWs in Montana in 2014 since limitations on data availability preclude making a precise estimate. This best estimate references the Montana Department of Labor and Industry's Labor Day Report, 2012 Census of Agriculture and Rural Employment Opportunities. Given the lack of alternative or more up-to-date information, this report assumes that the observed relationship between the number of jobs and numbers of farm workers in 2012 has been constant, or little changed, over the last 4 years. Actual trends in the official agricultural employment data offer support for this assumption, including data from the economic rebound. Although displaying year-to-year variables, overall agricultural employment levels in Montana do not appear to have changed much over the last six years. The best estimate of MSFWs in Montana is 23,199. Barring any significant changes in crops and livestock production in Montana, the estimated numbers of MSFWs in Montana are expected to remain near these same levels over the next year. Outreach Activities Montana has a working partnership with the Montana NFJP grantee, Rural Employment Opportunities (REO) as well as with Migrant Education. DLI actively collaborates in outreach efforts with these organizations. REO is the WIOA Section 167 grantee in Montana and has field staff deployed around the state. In that capacity, REO has separate reporting and tracking requirements. REO has nine field offices around the state. Four of these are co-located in the Job Service offices. The other five field offices that are not co-located in the Job Services partner closely with the office in their respective areas. The agreements between these agencies require coordinated services, including outreach activities. The 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 Job Service offices or community-based organizations for further services. The REO staff also conduct outreach to businesses on a regular basis, resulting in paid OJT and work experience opportunities for qualifying MSFWs. Through this partnership, Montana has been able to reach and serve members of the agricultural community who are otherwise not reached by workforce staff. REO provides employment and training options/funding to MSFWs around the state and to their qualifying dependents. 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. Individuals are referred for additional services to Job Service offices or community based organizations. REO, in partnership with the Montana Food Bank, provides food and gas assistance to MSFWs traveling in both Eastern and Western migrant streams. 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. DLI and REO have a Memorandum of Understanding (MOU) in place. This MOU contains elements of annual joint outreach training opportunities and staff meetings, information-sharing between the partners regarding MSFW services, and collaboration on special projects and training. The Job Service expects to assign at least 876 hours of staff time to outreach in the next year. 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 (Food Stamps) and TANF (cash assistance) public assistance office, upcoming opportunities for occupational trainings, contact information for the local migrant council, 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 if housing is needed. There are 21 outreach workers located in Job Service offices throughout the state who conduct a variety of MSFW outreach activities year-round. Outreach workers spend time in the service area contacting, explaining and encouraging MSFWs to use the services and resources available at the office. The outreach workers find MSFWs throughout the state, especially in rural areas where they live, work, and gather, such as markets, parks and other locations. The many 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, Job Service offices, public and private community agencies, MSFW groups and businesses
- 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 MontanaWorks system registration, resume, job applications and other documents as needed
- Providing assistance with obtaining unemployment insurance benefits, information on the UI4U web site, and referrals to specific employment opportunities if MSFWs are unemployed
- Making referrals to supportive services which MSFWs and their family members may be eligible to receive
- Providing information regarding current and future employment opportunities which may be available; this includes posting job orders and informing MSFWs about available H-2A job orders
- Informing MSFWs of the full range of available services, including job training opportunities available through Job Service offices and the local community-based organizations
- Informing MSFWs about the Job Service complaint system and providing assistance with filing and processing complaints

In addition, information from WIOA Section 167 partners located in Job Service offices throughout the state is included to help MSFWs receive a comprehensive blend of core, intensive, and training services designed to place them into full-time, non- seasonal employment or upgraded agricultural employment. The outreach workers are also heavily engaged in the recruitment efforts of domestic workers to H-2A job vacancies. These activities include:

- Performing various recruitment activities, including outreach, to find and refer qualified domestic workers in order to fill H-2A job openings
- Encouraging agricultural businesses to use the Agricultural Recruitment System for publishing job openings to fill their job openings locally and/or through the H-2A program, if necessary
- Conducting follow up contacts with domestic employees that were either referred to or applied to an H-2A job posting through the Job Service

REO, as a partner in this effort, provides supportive services (gas and food) to qualifying H-2A workers.

The data gathered by the outreach workers on the number of MSFWs contacted through outreach activities and by other agencies in the area are recorded and submitted to the Monitor Advocate in the central office. The Monitor Advocate works directly with the Job Service offices to ensure that these sites are in compliance with federal mandates and Montana Workforce Services Division policies and procedures. Montana continues to partner with Rural Employment Opportunities, Migrant Education and the local Migrant Councils to assist in overcoming barriers and in providing services to the MSFWs. The required number of MSFW contacts by outreach staff per day, according Department of Labor guidelines, is a



minimum of five contacts per eight hours worked. The outreach staff that are assigned to each Job Service office are not full-time outreach staff. Each of these staff members has several duties that must be met each day.

Services Provided to Farmworkers and Agricultural Businesses through One-Stop Centers  
Services Provided to MSFWs through the One-Stop System Montana is required to make the services of the Job Service offices available to all job seekers, including MSFWs, in an equitable manner. Each Job Service office 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 from Job Service offices, including all other DOL-funded WIOA services, must be 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.

The Montana Workforce Services Division recognizes the importance of the agricultural industry in Montana and has devoted resources to meet the labor needs of agricultural businesses 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 Job Service offices provide customized services to businesses on an individual and as needed basis. These services are in addition to the MontanaWorks 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 businesses, and tracking referrals made to job openings. Outreach workers also provide the following service to agricultural businesses:

- Perform recruitment activities to find and refer qualified MSFWs to fill the labor needs of agricultural businesses

- Encourage agricultural businesses 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

- Provide Rapid Response services due to planned closure or mass layoffs

Additionally, REO provides businesses with reimbursement of up to 75% of a client's wages during a contracted work experience or OJT. Review and Comment by Key Stakeholders  
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-MSFW

Although significant outreach was achieved by local offices, the stated goal from the previous Agricultural Outreach Plan was not successfully reached. To remedy this, additional training in recognizing MSFWs and how to record each outreach contact and service offered to the MSFW.

## (E) STATE MONITOR ADVOCATE

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

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 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). 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 has consistently met five of the five equity ratio indicators during PY 2013–2014 and has been making steady improvement in meeting the minimum service level indicators from three of the seven to currently meeting five of the seven service level indicators. To ensure that all equity indicators will be met going forward, the Monitor Advocate has begun conducting annual programmatic reviews of all 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. If the Monitor Advocate identifies a finding, a Corrective Action Plan is requested, and the Monitor Advocate follows up with each Job Service site to ensure that the Corrective Action Plan is being implemented appropriately and is brought into full compliance. 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.

The State Monitor Advocate has approved 2016's AOP.

## F. WAGNER-PEYSER ASSURANCES

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The State Plan must include assurances that:

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

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## PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAMS

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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

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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 State Office of Public Instruction (OPI) Common Core Standards (CCR) were adopted on November 4, 2011, with Montana being the last of 46 states to adopt these standards for K–12 education. These standards ensure that secondary students graduate prepared for college and the workforce, as they reflect the knowledge and skills that students need to be successful in the 21st century economy such as problem–solving, critical thinking, communication, teamwork, research and use of technology.

In February 2015, the Adult Education (AE) unit at the OPI adopted the College and Career Readiness Standards for Adult Education. These standards have identified the essential CCR standards that need to be incorporated into the adult education classroom. By adopting these standards, the Montana 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 College and Career Readiness 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 OPI CCR 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 consider 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

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

The state will require eligible providers to operate a program that will include adult education, literacy, work place 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 the comprehensive adult education services required for transitioning adult to postsecondary education, occupational training or employment. This model has been the driving force for adult education services during the past program year. This confirms that programs can and are willing to deliver a variety of services to best meet individual student needs.

The foundation of every providers' Local System Model was the identification of partners they would need to collaborate with to provide the necessary variety of adult education and literacy activities. This allows for all activities to be provided concurrently with other activities as needed.

All eligible adult education and literacy 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. Services will include English Language Acquisition and Integrated Literacy and Civics Education.

The state will not fund family literacy activities, as this has not been included in the Montana allowable activities in the past. Limited resources have been the basis for this decision.

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

The state will fund local providers that can provide services to adults 16 years and older, not enrolled in secondary school, to include adult education and literacy services, peer tutoring, career pathways, and concurrent enrollment. Local providers will be selected with several criteria:

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 academic 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 clearly articulate how their instructional delivery model will be aligned to the needs of one-stop, postsecondary, and business 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 (or having relevant adult education experience) teachers, counselors, or administrators, 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 electronic means, so all staff will be able to participate in a variety of delivery venues.

Providers will ensure that they will make available curriculum that supports high school equivalency attainment, measurable skill gains, and career pathways. Instruction in all content areas (reading, writing, speaking, mathematics, and English language acquisition) will be delivered by staff who are knowledgeable of the essential components of reading instruction, or who will participate in State leadership activities focused on the essential

components of reading. Providers must use scientific, effective research–based instructional delivery models for students in all content areas. Providers will articulate how distance learning, and other modes of technology, will be integrated into instruction to support digital literacy attainment and meet students’ specific learning needs.

The overarching 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 instruction be contextualized, and student pathways guided by labor market needs and data from collaborative partnerships (education, one–stop partners, and business). Providers will submit an annual Work Plan documenting all partnership activities that support student career pathways.

The array of program activities that support the individual students’ career pathway 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)/PEP Talk. Providers will detail how teachers will be assisting students in aligning their skills and interests with a career choice and helping them to 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 students’ career goal. Providers will confirm that they are continually developing curriculum and providing learning activities that are contextualized, so students acquire the 21st century knowledge and skills needed for transition to their individual career pathway. Providers will apprise the state of the key partners who are involved in the development of the contextualized curriculum. Eligible providers will also articulate how they plan to 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, and individualized instruction along with distance learning. The variety of instructional strategies will integrate academics, career counseling, and soft skills to bolster the students’ ability to gain employment, go to college, or enter a training program that could include an apprenticeship.

3. Organization: Providers must make available documented evidence that they have the capacity to support the high-quality data information system necessary to report measurable client outcomes and monitor program performance. The system must collect all data elements that will be required for the WIOA Annual Statewide Performance Report. Primary indicators of performance that will be reported include: clients in unsubsidized employment during the second quarter after exit, clients in unsubsidized employment during the fourth quarter after exit, median earnings from unsubsidized employment the second quarter after exit, the percentage of students who obtain a postsecondary credential or a high school equivalency diploma, the 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. The MCIS/PEP Talk will be the common career planner used in adult education programs to share student career pathway information across agencies. The common career planning tool will be a resource in every AE program.



Beyond assisting students for 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 (completing applications, writing resumes, scheduling campus visits, etc.) that can be barriers to success. Providers must be willing to cooperate with agency partners to provide the wrap–around services common clients will require.

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. Providers must be able to disclose their methodology for ensuring that business and labor market needs are helping drive their instructional practice.

Allocations for providers will be awarded by a funding formula that recognizes the components of an effective AE program (WIOA Statewide Performance Report). Effective programs will be those that deliver instructional activities that support student transition to specific occupations or career clusters. Cost per student will be a consideration in awarding eligible providers; eligible providers will provide documentation of cost per student to demonstrate program effectiveness. Grant award preference will be given to providers that can demonstrate that instructional services will be delivered cost effectively to a reasonable number of students, and that they can make themselves readily available to core partners for necessary core–partner wrap around services. Consortium applications are encouraged to assist providers in meeting the cost benefit expectations and core partner collaboration.

### **SPECIAL RULE**

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

### C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

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

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

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

The Montana 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 will be targeted for adult education and literacy activities and career pathways. Grant funds may be awarded to any eligible provider that offers appropriate services to incarcerated or institutionalized individuals. Funds will be awarded using the same competitive application process outlined in the Common Elements-Multi-Year Grants or Contracts; after which providers may request funds on an annual basis through an extension application.

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

The state will award allocations to correctional institutions (prisons, jails, reformatories, work farms, detention centers, halfway houses, community-based rehabilitation center, 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. The state will give priority to providers who will be serving individuals who will be likely to leave the correctional facility within five years of participation in the program. Providers will confirm their ability to support individual client's career plans through curriculum and activities that assist in not only an 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, they 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

### 1. DESCRIBE HOW THE STATE WILL ESTABLISH AND OPERATE INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAMS UNDER SECTION 243 OF WIOA, FOR ENGLISH LANGUAGE LEARNERS WHO ARE ADULTS, INCLUDING PROFESSIONALS WITH DEGREES AND CREDENTIALS IN THEIR NATIVE COUNTRIES.

The state's application for 243 funds will require applicants to describe how they plan to 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.

### 2. DESCRIBE HOW THE STATE WILL FUND, IN ACCORDANCE WITH THE REQUIREMENTS OF TITLE II, SUBTITLE C, INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION SERVICES AND HOW THE FUNDS WILL BE USED FOR THOSE SERVICES.

Adult Education providers in MT have provided English Language and Civics Education programs with great success under WIA. Montana AE will build on this success to continue to provide Integrated English Literacy and Civics Education (IELC) activities. Through an annual IELC meeting and ongoing conversation through a Wiki Website, teachers have continually shared best practice and cutting-edge material. These platforms will continue to provide the professional collaboration needed to meet the new requirements under WIOA and deliver the services students need. These services will 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 effectively as citizens in the United States. Such services shall include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation and may include workforce training.

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

## E. STATE LEADERSHIP

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### 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 will support the alignment of AE activities with those of other core partners to promote career pathways that will provide student 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 a 2015 WIOA Summer Kickoff that brought over 300 staff members from all the core partner agencies together to begin the discussion on how we can coordinate services to support a client's development of a career pathway and expedite his/her transition to employment or training services.

Braiding funds with other core partners for conferences and trainings focused on supporting career pathways will be the way leadership dollars will align with the work of our core partners. This collaboration across core partner agencies will evolve to meet the needs of WIOA implementation and sustainability. Secondly, the state will support the 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 needs 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. Thirdly, 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 related to the specific needs of adult learners. Leadership activities in the components of reading will be used to create the foundation for adults to develop the skills for reading from complex text in postsecondary education and employment. Instruction in the essential components of reading will be made available to all programs through various venues depending needs of the individual program staff. Student information system data will be used to determine instructional needs in reading. The state will contract with reading experts to bring job-embedded professional development. Teachers will be required to participate in reading professional development that blends face-to-face and technology.

The state will also contract for services 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 having data

that shows successful student exit trends will be provided with funds for to prepare workshops and regional trainings to share instructional strategies and activities that are positively impacting 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 will be available for instructional improvement in reading, writing, mathematics, English language acquisition, speaking, as well as distance learning. Technical assistance will be offered in two ways: training with staff from other eligible providers who have demonstrated effectiveness or independent contractors. In either case, the individual contractor will be 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 will be a priority. Technical assistance may also be available for programs in the use of technology, including digital technology and technology for system efficiencies.

The state will require each program to conduct monthly audits to evaluate students' pre-posttest 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 regularly scheduled on site 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.

If 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 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 MT AE Unit at the Office of Public Instruction. The state will provide continuing education units for teachers that will be tracked in the state student information system.

## 2. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT PERMISSIBLE STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA, IF APPLICABLE.

The state will work in collaboration with core partners to develop strategies for student retention and to help eligible providers in developing and implementing the objectives of Title II of WIOA. Learner education gains and enhancement of employability skills will increase the success of clients across all core programs. This collaboration may require use of permissible funds.

## F. ASSESSING QUALITY

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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 will assess the quality of providers through data analysis. The state will review data to track providers' success in meeting state targets in the following areas: learning gains, entry into employment in required quarters, obtaining a secondary credential and enrollment into postsecondary or training, obtaining a secondary credential and gaining employment, or gaining a postsecondary credential. Monthly desk audits will provide the state with information on which providers are challenged in meeting targets and in need of technical assistance beyond the state leadership activities that are provided. Technical assistance will be targeted to the area of need; it will be individualized and focused.

At the end of a program year, providers not meeting targets will be required to participate in a state-determined technical assistance project that will continue throughout the next program year. If a program remains in a technical assistance plan for two years, they may be in jeopardy of not receiving AEFLA funds during subsequent years. 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 will be awarded according to the State performance-based funding formula. Points will be awarded for performance outcomes; programs not meeting outcomes will receive reductions in their allocation.

The quality of professional development will be assessed with scrutiny like assessing the quality of local providers. Initially, the state will use a combination of program data and a statewide survey to determine professional development needs. Professional development providers and activities will be selected to meet the identified state needs, and they will be selected according to their past effectiveness. Special attention will be given when determining who and how we will select a professional development strategy to meet the research-based components of phonemic awareness, system phonics, fluency, and reading comprehension. This will be a priority for the state.

After each professional development activity, all clients will complete an evaluation, which will be aggregated at the state level to assess the impact of the activity and what follow-up activities may be needed to support program improvement. Additionally, clients will be required to analyze student performance data prior to professional development, after the activity, and continue to evaluate the data overtime, until it has been 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.



## CERTIFICATIONS

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States must provide written and signed certifications that

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

## CERTIFICATION REGARDING LOBBYING

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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 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.

## STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

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

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

Applicant's Organization     **MT Office of Public Instruction**

Full Name of Authorized Representative:     **Elsie Arntzen**

Title of Authorized Representative:     **Superintendent of Public Instruction**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable, please print, sign, and email to OCTAE\_MAT@ed.gov

## ASSURANCES

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The State Plan must include assurances that:

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

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## PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION

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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:

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

## A. INPUT OF STATE REHABILITATION COUNCIL

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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;

VRBS maintains a State Rehabilitation Council (SRC) that meets the criteria set forth in Section 105 of the Rehabilitation Act, 34 CFR 361.17. The designated state unit jointly with the SRC develops, agrees to and reviews annually state goals and priorities and jointly submits to the commissioner annual reports of progress in accordance with the provisions of Section 101(a) (15) of the Rehabilitation Act, 34 CFR 361.29 and the Montana Combined State Plan.

On September 14, 2017 the SRC provided the following input for the Federal Fiscal Year 2019 vocational rehabilitation portion of the Montana Combined State Plan. Responses to the input have been developed and were finalized at the December 20, 2017 VRBS leadership meeting. The following responses will be provided to the VRC prior to their next meeting:

### STATE REHABILITATION COUNCIL (SRC) RECOMMENDATIONS:

#### **INTERNAL CONTINUOUS IMPROVEMENT**

- VRBS needs to review current rules and procedures and make revisions to reflect WIOA values of:
  - preparing youth with disabilities for meaningful careers,
  - competitive/integrated employment for all persons with disabilities, and services to employers.
- VRBS should continue efforts with schools and Job Service partners to engage staff in WIOA changes to enhance outreach to businesses.
- VRBS should train staff to better effect WIOA emphasis on competitive/integrated community employment rather than segregated, facility-based employment.

#### **PROVIDE 21<sup>st</sup> CENTURY QUALITY SERVICE**

- VRBS should coordinate with service providers to make sure consumers can financially benefit from employment.
- VRBS, along with schools should continue to improve outreach efforts to employers.
- WIOA is a significant change in direction for VR nationally. VRBS needs to develop a clear set of statements on VRBS's plans related to Pre-employment Transition Services, Competitive/Integrated Employment and Employer Services for partners to understand.

#### **NETWORK WITH OTHER AGENCIES & EMPLOYERS**

- With order of selection in place, VRBS should work to build strong relationships with other community partners to facilitate access to a broader array of services for Montanans with disabilities.
- VRBS should partner more with all levels of education.

**VRBS should distribute the recently completed brochure on VR and business in order to make them aware of employer services available to them through VRBS and the untapped resource of persons with disabilities as quality employees.**

## **2. THE DESIGNATED STATE UNIT'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS; AND**

SRC Recommendation: VRBS needs to review current rules and procedures and make revisions to reflect WIOA values of: preparing youth with disabilities for meaningful careers, and competitive/integrated employment for all persons with disabilities, and services to employers.

VRBS Response: VRBS staff have spent a significant amount of time reviewing the changes that need to be made to their current rules and procedures related WIOA and the areas mentioned. Many procedures have been changed and VRBS will soon be making many rule changes in this regard. The Council will be kept informed as the rule changes proceed.

SRC Recommendation: VRBS should continue efforts with schools and Job Service partners to engage staff in WIOA changes to enhance outreach to businesses.

VRBS Response: VRBS has initiated significantly increased collaboration with schools and Job Service partners in a number of areas. The Windmills activities are probably the best example with Job Service partners. Activities in this regard with schools are carried out quite differently around the state as the partnerships are focused on the town involved. VRBS will continue to work on developing these efforts and keep the Council informed of significant developments.

SRC Recommendation: VRBS should train staff to better effect WIOA emphasis on competitive/integrated community employment rather than segregated, facility-based employment.

VRBS Response: WIOA changes made it very necessary that when staff were working with consumers on career planning and job placement that the updated competitive integrated employment guidelines were utilized. VRBS has provided guidance to staff that a variety of past placements did not meet the new guidelines and have made it quite clear that some past placements would no longer be accepted as successful placements. Also, when necessary, staff have been given guidance to work with consumers to develop goals that are truly competitive integrated goals or VRBS cannot support activities related to achieving the goals.

SRC Recommendation: VRBS should coordinate with service providers to make sure consumers can financially benefit from employment.

VRBS Response: The emphasis on competitive integrated employment is a large factor in increasing consumers benefiting financially from employment. A specific factor that has been strongly followed is that an appropriate wage is no longer considered to be at minimum wage. Rather, a competitive integrated outcome needs to be at a wage comparable to others in similar positions. Also, when appropriate, staff have been guided to encourage consumers who receive Social Security benefits to receive benefits counseling in order to ensure that consumers are aware of how to utilize Social Security Work Incentives to understand how wages affect benefits.

SRC Recommendation: VRBS, along with schools should continue to improve outreach efforts to employers.

VRBS Response: Again this is carried out in a highly local approach as each community presents unique opportunities and difficulties in this regard. VRBS will attempt to develop methods to provide more guidance in this regard and keep the Council informed of developments.

SRC Recommendation: WIOA is a significant change in direction for VR nationally. VRBS needs to develop a clear set of statements on VRBS's plans related to Pre-employment Transition Services, Competitive/Integrated Employment and Employer Services for partners to understand.

VRBS Response: VRBS has recognized the significant changes required by WIOA. VRBS responded by changing a wide range of activities and the overall vision of the agency. The most significant changes have probably been in the areas of school contracts for pre-employment transition services and working with Independent Living Centers on the Section 511 activities. Changes have been developed and are occurring. However, more can be done on developing specific statements and materials for partners to understand the changes. VRBS wanted to implement and evaluate changes before much was done to develop materials related to explaining the changes. This was done in order to identify best practices and refine activities before developing descriptive materials.

SRC Recommendation: With order of selection in place, VRBS should work to build strong relationships with other community partners to facilitate access to a broader array of services for Montanans with disabilities.

VRBS response: Consumers determined to be in a closed category during order of selection are given a list of alternative resources for services specific to the region they live in.

Also, WIOA mandates partnership with many other agencies involved with the workforce service system. The relationships built through this stronger partnership are expected to provide new opportunities for consumers in closed categories during order of selection.

In addition, VRBS has been working with other agencies to understand that many consumers are on a waiting list for VR services and agencies need to understand this and do the best they can to help consumers until their VR services can become active.

SRC Recommendation: VRBS should partner more with all levels of education.

VRBS response: VRBS has completed multiple contracts with high schools around the state to establish Pre-employment Transition services. VRBS definitely does believe that the partnership with high schools is significant in assisting young people with disabilities prepare for their careers.

VRBS also partners with other levels of education. VRBS has worked with several of the college and universities in the state to develop programs that assist youth with disabilities in a variety of ways. VRBS will keep the Council informed of the activities being conducted with all levels of education.

SRC Recommendation: VRBS should distribute the recently completed brochure on VR and business in order to make them aware of employer services available to them through VRBS and the untapped resource of persons with disabilities as quality employees.

VRBS Response: VRBS agrees the new information needs to be distributed and will be doing so. Any assistance the Council can provide with the distribution is greatly appreciated.

### **3. THE DESIGNATED STATE UNIT'S EXPLANATIONS FOR REJECTING ANY OF THE COUNCIL'S INPUT OR RECOMMENDATIONS.**

Each explanation was included immediately following the VRC comment. See previous section.



## B. REQUEST FOR WAIVER OF STATEWIDENESS

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

1. A LOCAL PUBLIC AGENCY WILL PROVIDE THE NON-FEDERAL SHARE OF COSTS ASSOCIATED WITH THE SERVICES TO BE PROVIDED I N ACCORDANCE WITH THE WAIVER REQUEST;

No waiver requested.

2. THE DESIGNATED STATE UNIT WILL APPROVE EACH PROPOSED SERVICE BEFORE IT IS PUT INTO EFFECT; A N D

No waiver requested.

3. ALL STATE PLAN REQUIREMENTS WILL APPLY

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

No waiver requested

## C.COOPERATIVE AGREEMENTS WITH AGENCIES NOT CARRYING OUT ACTIVITIES UNDER THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM.

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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:

### 1. FEDERAL, STATE, AND LOCAL AGENCIES AND P R O G R A M S ;

Vocational Rehabilitation and Blind Services (VRBS) presently has agreements with the following entities:

- Section 121 Vocational Rehabilitation Projects located in Montana
- Mental Health
- Developmental Disabilities
- Montana Small Business Development Centers (SBDC)
- The Randolph-Sheppard/Business Enterprise Program
- Public Transportation Programs
- Social Security
- MonTECH (the State Assistive Technology Program)
- Non-educational agencies serving out-of-school youth

### **Section 121 Vocational Rehabilitation Projects**

VRBS presently has cooperative agreements with all of the six Section 121 projects (Flathead Reservation, Fort Belknap Reservation, Fort Peck Reservation, Rocky Boy's Reservation, Northern Cheyenne 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 six reservations that currently have a tribal vocational rehabilitation project.

### **Mental Health**

This cooperative agreement has provisions that include:

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 funded by the Addictive and Mental Disorders Division.

4. To provide cross-training and technical assistance between our agencies.
5. To establish and evaluate annual goals for our interagency work towards coordinated vocational and support services.

### **Montana Small Business Development Centers (SBDCs)**

The purpose of this agreement is to establish guidelines and procedures to be used by the Montana Small Business Development Centers (SBDC) and VRBS in coordinating the services of both programs on behalf of individuals with disabilities who desire to pursue the goal of self-employment. This agreement outlines each party's role and responsibilities, referral procedures, information exchange methods, forms used, and implementation, evaluation, amendments and termination procedures.

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

The BEP program continues with three vendors. The program is at a point where it can consider starting one or two part-time routes if an interest is expressed by BLVS consumers to become a vendor.

### **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.

### **Social Security Administration**

VRBS works with the Social Security Administration to collaborate on employment incentives and supports and 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
- Client Assistance Program
- Disability Determination Services
- Rocky Mountain Rehab

## **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)**

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

3. The MonTECH director recently resigned and VRBS will have a member on the search and selection committee for the new director.

### 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.

### 4. NONEDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

#### **Non-educational agencies serving out-of-school youth:**

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.

## D. COORDINATION WITH EDUCATION OFFICIALS

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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.

**VRBS' transition coordinator** will coordinate with Montana OPI transitions specialists to develop and promote a seamless transition system. VRBS' transition coordinator oversees the implementation of VRBS' "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 and 504 coordinators, teachers, school administration, parents, advocacy groups and others regarding the role of VRBS in the transition process. The VRBS assigns a vocational rehabilitation counselor to each high school in the state. Counselors shall inform student, families special and regular education teachers, school administrators, advocacy groups, and others about VRBS. Counselors will distribute both print and electronic materials that explain transition and rehabilitative services, and they will maintain monthly contact with local school authorities

**Local School Districts:** In the last year, 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 students involved in Pre-ETS activities. The school districts are required to provide VRBS with the documentation of students participating in Pre-ETS.

**Other pre-ETS activities:** VRBS contracts for the provision of the Montana Youth Leadership Forum (MYLF), Montana Youth Transitions Program (MYTransitions), and Movin' On in Montana. MYLF (pronounced "my life") is a unique career and leadership training program for high school sophomores, juniors, and seniors with disabilities. By serving as delegates from their communities at a 5-day intensive training, youth with disabilities will cultivate leadership, citizenship, and social skills. MYTransitions connects students and families to others across Montana who are also in transition or who have already navigated the transition process, and acts as a reference tool for youth with disabilities and their families. Designed for high school sophomores, juniors, and seniors, Movin' On in Montana guides students with disabilities through the transition from high school to college, providing training to further develop study skills, compensatory skills, social skills, and the personal skills of successful college students.

### 2. INFORMATION ON THE FORMAL INTERAGENCY AGREEMENT WITH THE STATE EDUCATIONAL AGENCY WITH RESPECT TO:

#### A. CONSULTATION AND TECHNICAL ASSISTANCE TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING VR SERVICES;

The following is from the MOU with the Office of Public Instruction that details the technical

assistance responsibilities of each agencies.

The OPI shall provide technical assistance to local school districts concerning the provision of free, appropriate, public education, including the responsibility to provide assistive technology to assist with the education of students approaching transition to independent living and employment as appropriate.

The VRBS' transition coordinator shall meet with staff and other interested parties in other school districts when invited to share best practices and facilitate communication between the parties. VRBS' staff will also be available to provide information on changes in the law or policy regarding transitions services.

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.

**B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE  
AGENCY AND EDUCATIONAL AGENCY THAT FACILITATES THE  
DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED  
EDUCATION PROGRAMS;**

The following are sections of the MOU with the Office of Public Instruction related to related to the development and implementation of individualized education programs (IEPs).

The VRBS counselor shall assist school districts in planning for the transition of students with disabilities from school to post school activities. The VRBS counselor shall act as a consultant for the school district. VRBS may provide consultation services to students and families only after VRBS takes an application from the student. When requested by the local school district, VRBS shall ensure that the VRBS' counselors/staff participate in the evaluation process of students who have applied for VRBS, and in the development of the IEP's for eligible students.

While not part of the MOU with the OPI, VRBS commits to the development and approval of an IPE before each eligible student able to be served under the order of selection leaves the school setting. Should Montana come out of order of selection, VRBS is committed to development and approval of an IPE before each student determined to be eligible for vocational rehabilitation services leaves the school setting.

The OPI shall assist school districts to inform VRBS of students with disabilities who are on an IEP and may be in need of assistance through VRBS. The notice to VRBS shall occur no later than the first IEP at which transition services are considered in order for VRBS to participate in the future development of the student's IEP. For students enrolling closer to graduation or age 21, school districts are urged to inform VRBS as soon as those students are identified.

For all IEP meetings subsequent to the first meeting, the OPI shall encourage school districts to schedule IEP meetings for eligible students with disabilities in a timely manner, and to include notice to VRBS and the invitation for the VRBS counselor to participate subject to parental approval. Development of vocational goals and objectives shall occur in collaboration with the IEP team.

For the first IEP meeting following the initial notice to VRBS, the OPI shall encourage school districts to inform VRBS of the meeting in advance to allow sufficient time for VRBS to acquire the necessary diagnostic data to determine the student's eligibility. The notice to VRBS should include an invitation to the VRBS counselor to participate, from then on, in transition planning within the IEP process. VRBS participation in IEP meetings is subject to parental approval.

The OPI shall assist local school districts with referrals of students with disabilities who do not receive special education services and related services and may be in need of services through VRBS. The notice to VRBS should occur at least one year before the student's anticipated graduation date.

**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 agencies and related matters.

The OPI shall assist local school districts 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.

VRBS will provide assistive technology services relevant to functions outside those assistive technology services required to access the educational program.

Montana is a local control state in which local school districts 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, school officials, and vocational rehabilitation professionals.

If there is a dispute as to which entity is responsible for providing a necessary service, consultation will occur between the entities. Services or payments will be based on the rights of the student, availability of funds, and which agency is best positioned to provide the particular service at the time. Should the local school district and VRBS be unable to resolve the dispute after consultation with one another, the Dispute Resolution Procedure outlined in the Interagency Agreement between the Department of Public Health and Human Services and the OPI shall apply.

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.
- 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.

#### **D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.**

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.

VRBS assigns a vocational rehabilitation counselor to each high school in the state. Counselors shall inform student, families special and regular education teachers, school administrators, advocacy groups, and others about VRBS. Counselors will distribute both print and electronic materials that explain transition and rehabilitative services, and they will maintain monthly contact with local school authorities.

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

## E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

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(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 Community Rehabilitation Providers (CRP) to accept a set fee for service, but does not guarantee a minimum level of consumers to be referred. The contract used with CRPs follows 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 CRPs are directly approved from 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; or have accreditation from the Commission on Accreditation of Rehabilitation Facilities (CARF) or Rehabilitation Services Accreditation System (RSAS). In a limited number of cases, individuals with appropriate backgrounds are authorized to provide services in remote rural areas where a DPHHS, RSAS or CARF provider is not available.

VRBS has collaborated with the Developmental Disabilities Program (DDP) to develop a training program for direct line staff of CRPs that provide vocational services. The provider responsible to develop the training has been identified and in the upcoming year an on-line training will be developed and available to all CRPs working with VRBS and/or the DDP. Satisfactory completion of the training will be mandatory for staff involved with vocational services for the two sponsoring agencies. There will be a test that can be taken to demonstrate competency related to the skills covered by the training. If the test is passed, then the person can opt out of the training.

## F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

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(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. Their contributions are described later as they have their own sections below.

**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, crew or community-based employment services. In many of the past legislatures there have been generous increases in funding recognizing the unmet needs for these services. However, the most recent legislature provided level funding. The extended employment services program is 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. In the last two years, VRBS and RMR have been working to transition 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

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

### 1. VR SERVICES; AND

#### **Coordination with Employers**

VRBS coordinates with businesses through several avenues, including new initiatives that are in the planning stage, all of which are designed to enhance efforts to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services and transition services, including pre-employment transition services.

These initiatives include:

- A standalone VRBS Business Services website for businesses to use to learn about the services we have to offer
- Coordination with Montana Workforce Centers to input and collect data on Business Services. This allows VRBS to collaborate 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.

Agreements with private and non-profit providers related to transition include the following

**Montana Youth Transition (MYTransition):** VRBS provides funding and collaboration with MYTransitions to provide:

- The statewide comprehensive website on all aspects of transition, <http://montanayouthtransitions.org/>
- An annual conference on Montana Transition activities with separate tracks for school personnel, adult service personnel, parents, and youth, along with combined sessions for developing coordination.
- Coordination of statewide job shadowing activities.
- Coordination and funding for five regional transition teams to work on local collaboration and transition projects

**Montana Youth Leadership Forum (MYLF {pronounced my life})** VRBS provides funding and collaboration for the week-long forum for approximately 20 youth with

disabilities. The forum focuses on developing a plan for contributing to the community, self-advocacy, soft skills, adult resource identification and a variety of other skills and abilities related to transition.

**Moving On:** VRBS provides funding and coordination for a week-long activity on a college campus for approximately 20 youth with disabilities to explore post-secondary education as a transition option. The program exposes clients to the college campus, college type classes, disability services and other topics.

**Counselor-purchased pre-ETS services:** VRBS is contracting with several private, for- and non-profit community rehabilitation providers and other groups (e.g., centers for independent living) for the provision of special projects that offer students with disabilities services and activities in all five of the core pre-ETS service categories.

As mentioned before, VRBS also contracts with local school districts on developing and providing pre-employment transition services based on the individualized needs of the local area. The pre-employment transition work plan is developed by the local schools, VRBS personnel and other stakeholders.

## H. INTERAGENCY COOPERATION

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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;

#### **Interagency Cooperation**

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

Specific examples of collaboration include:

- Working collaboratively with VRBS and the Developmental Disability Program's Medicaid waiver to develop long-term supports needed for supported employment consumers
- Working with the Supported Employment Leadership Network in order to assist the Developmental Disability Program to adjust their Medicaid waiver services to increase services related to employment
- Beginning the planning process of specific cross-program protocol so that VRBS can maximize utilization of comparable benefits and make appropriate referrals to Montana Medicaid.

Also, VRBS works closely with the Social Security sponsored Work Incentives Planning and Assistance project in Montana to assist consumers to understand the impact of working on their benefits, including Medicaid.

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), and that program continues to provide for long-term support services for many individuals with significant disabilities. The programs have begun the process of formulating an agreement to better implement changes stemming from WIOA and address ongoing challenges within the Montana Extended Employment Program. However, the agencies have continued to work under the conditions of the past agreement which include guidance for:

- Cross-training and technical assistance between our agencies to make available the required supported employment services.
- 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.

### 3. THE STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES.

VRBS has a negotiated cooperative agreement with the Addictive & Mental Disorders Division. The cooperative agreement provides guidance for: cross-training and technical assistance between our agencies, establishment and evaluation of annual goals for interagency work towards coordinated vocational and support services, and makes available the required supported employment/extended support/follow-along services from enrolled community rehabilitation programs (CRPs) and certified mental health providers.

## I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

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(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;

Comprehensive System for Personnel Development (CSPD) information is managed by the Human Resource Development (HRD) Specialist of the Vocational Rehabilitation and Visual Services (VRBS). This position keeps track of trainings offered, staff attending training, CRC credits for qualified counseling staff and their support team members.

VRBS staffing by type of staff (data from RSA 2):

Note: some positions were reclassified in 2014. Therefore some categories show big shifts that year and subsequent years.

**Administrative:** 2012 – 5, 2013-5, 2014 – 38, 2015 – 38, 2016- 36, 2017-31

**Counselor:** 2012 – 39, 2013-41, 2014 – 47, 2015 – 47, 2015- 56, 2016 – 56, 2017 - 45

**Support/Other:** 2012 – 45, 2013-45, 2014 – 2, 2015 – 2, 2016 – 3, 2017 - 3

**Total Staff** 2012 - 89 2013-91, 2014 – 87, 2015 – 87, 2016 – 95, 2017 - 76

**NOTE:** The RSA2 looks at positions and what part of the year they are filled. It is not the same as the number of bodies or the numbers of FTE.

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In fall 2015, VRBS reorganized to become "flatter" organizationally. Three regional managers were converted to section chiefs dealing with statewide issues: Youth, Businesses, and Quality Assurance. One regional manager position was vacant at the time and was converted to a counselor supervisor position. VRBS leadership believes this will make the organization more responsible for federal changes.

In recent years, VRBS experienced significant turnover in upper-management positions, including the state director, and several program managers. Even though VRBS management has stabilized, VRBS continues to prepare for succession through its VRBS' Futures Program, which is discussed elsewhere in this plan.



In FY2016, VRBS served 7,749 Montanans with disabilities, which means that each counselor served approximately 139 consumers. In FY2017, VRBS served 7,524 Montanans with disabilities, which means that each counselor served approximately 169 consumers. The calculation is based on using the RSA data reported above

The population in western Montana continues to grow, while the population in eastern Montana decreases. 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 possible. However, one counselor position from Billings was moved from the Billings office to the Havre office and another was moved from the Butte office to the Bozeman office. The increase in the Havre office staff was due primarily to the new emphasis in dealing with students with disabilities and the fact that the Havre office serves many small schools in a very large geographic area (travel distances can be over 200 miles). The increase in the Bozeman staff was related to the rapid increase in population in the Bozeman area in recent years.

When all the positions are filled, VRBS has enough staff to provide vocational rehabilitation services to the state. In the next five years, VRBS will continue to investigate the feasibility of increased counselor staffing to meet the transitions needs of Montana's youth with disabilities. VRBS would like to see a transitions counselor in each of its four regional offices. Of course, population growth and client demographics will be closely monitored. If our counseling staff increases, it is possible that additional support staff would also be necessary.

In recent years, VRBS experienced significant turnover in upper management positions, including the state director, and several regional administrators. Even though VRBS management has stabilized, VRBS continues to prepare for succession through its VRBS' Futures Program, which is discussed elsewhere in this plan.

ii. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

In FY2014, VRBS served 7,755 Montanans with disabilities, which means that each counselor served approximately 165 consumers. In FY2015, VRBS served 7,419 Montanans with disabilities, which means that each counselor served approximately 158 consumers. The calculation is based on using the RSA data reported above

The population in western Montana continues to grow, while the population in eastern Montana decreases. 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 possible. However, one counselor position from Billings was moved from the Billings office to the Havre office and another was moved from the Butte office to the Bozeman office. The increase in the Havre office staff was due primarily to the new emphasis in dealing with students with disabilities and the fact that the Havre office serves many small schools in a very large geographic area (travel distances can be over 200 miles). The increase in the Bozeman staff was related to the rapid increase in population in the Bozeman area in recent years.

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In recent years, VRBS experienced significant turnover in upper management positions, including the state director, and several regional administrators. Even though VRBS management has stabilized, VRBS continues to prepare for succession through its VRBS' Futures Program, which is discussed elsewhere in this plan.

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

Row	Job Title	Total positions	Current vacancies	Projected vacancies over the next 5 years
1	Division Administrator	1	1	0
2	Bureau Chiefs	1	0	0
3	Prog Mgrs (IL, Deaf; Soc Sec; HRD; Transportation, 3 section chiefs, and BLVS Admin)	9	2	3
4	Central Office Administrative Support Staff	2	1	0
5	Counseling Staff (BLVS, Gen Prog, & counselor sups)	49	16	5
6	Orientation and Mobility Specialists	4	1	2
7	Vision Rehabilitation Therapists	5	1	0
8	Field Administrative Support Staff	25	3	3
9	Tech Sup (Bud Anly; Bud Anly Sup; Prog An; AT SP)	4	1	1

## B. PERSONNEL DEVELOPMENT

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

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

VRBS continues to review, on a yearly basis, the reported training needs of its entire staff. This is part of our overall maintenance of the comprehensive system for personnel development. Of particular concern to VRBS is the implementation of a system of personnel development that will ensure an adequate supply of qualified rehabilitation personnel for the designated state unit. VRBS developed a new CSPD policy that clarifies requirements and expectations of employees engaged in CSPD plans. Additionally, a "tip sheet" was developed to notify counselors of institutions of higher education that offer RSA scholarships. The State Rehabilitation Council has had an opportunity to review and make comments on the development of the plans and policies regarding qualified personnel.

Currently 91% of VRBS's professional counseling and supervisory staff are identified as Certified Rehabilitation Counselors (CRC), which are qualified to sit for the CRC, or are under a CSPD Plan (including actively researching graduate schools). At this time, five counselors are engaged in graduate studies and two counselors are researching and/or applying to graduate schools. One counselor is in a medical hold status. Currently, VRBS has three counselor vacancies. As vacancies open, the new counselors may require graduate school preparation. In the last year, four counselors have been hired that have a Masters in related fields and have begun classes or are researching programs that provide the educational requirements to sit for the CRC exam. In addition, two counselors hired in the last year had the ability to sit for the

exam and were successful in obtaining a CRC credential.

Montana's personnel policy has been rewritten so applicants who have achieved the CRC status receive a higher priority for hiring than those without it. In addition, Montana vigorously recruits applicants with a Masters in rehabilitation counseling when there are vacancies. Montana State University - Billings (MSU-B) is Montana's only institution of higher education that offers instruction (BA or MA) in rehabilitation counseling. VRBS has a good working relationship with MSU-B. Additionally, VRBS has fostered good working relationships with out-of-state institutions such as Utah State University. Both MSU-B and Utah State have sought input from VRBS related to curriculum development and how to best prepare students to work in the public VR program. VRBS has successfully recruited and hired graduates of these programs, all of whom were well prepared to sit for the CRC examination. VRBS is also working with West Virginia University and the University of Kentucky to qualify its employees. The following table illustrates the education status of employees of VRBS preparing for CRC qualification.

While VRBS endeavors to hire staff with the CRC credential, Montana's rural location and relatively low wages make recruitment difficult. Likewise, VRBS often resorts to hiring staff keen to become credentialed. Toward that end, VRBS has fostered a strong working relationship with several institutions of higher education and refers its new hires to them to fulfill the education requirements of their CSPD plans. Three staff successfully fulfilled the education component of their CSPD plans in the fiscal year 2016. As mentioned above, 5 staff currently are engaged in graduate work; 2 are attending Utah State University and 3 are attending West Virginia University. See table below.

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.

Institutions	Degree	Students currently enrolled (FY17)	Employees sponsored by agency and/or RSA (FY17)	Graduates sponsored by agency and/or RSA (FY16)	Graduates from the previous year (FY16)
Utah State University	MRC	2	2	2	2
West Virginia University	MRC	3	3	0	0
University of Kentucky	MRC	0	0	1	1
<b>Total</b>		<b>5</b>	<b>5</b>	<b>3</b>	<b>3</b>

As of this writing, VRBS has 16 vacancies on its caseload-carrying staff roster (12 counselor vacancies & 4 counselor supervisor vacancies). Due to statewide budget constraints and a subsequent hiring freeze, VRBS will not be able to hire until July 2019.

## 2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL

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

VRBS continues to recruit the highest quality staff available. Individuals coming to VRBS without a Master's degree in rehabilitation counseling will be hired on the condition that they will develop a CSPD plan to meet the standard.

Through the extensive outreach efforts of the Blind and Low Vision Services (BLVS) staff and the HR staff within the department, BLVS can sometimes attract candidates from across the country for Vision Rehabilitation Therapists and Orientation and Mobility Specialists. In other cases, BLVS must hire someone locally on a training assignment and pay for their schooling.

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 problem for BLVS. Training positions have been developed to address this dilemma.

VRBS maintains contact with Montana State University-Billings to update them on VRBS. The agency gathers information on degree requirements, and works with rehabilitation counseling instructors to ensure that university requirements are compatible with those needed to qualify counselors to effectively and efficiently serve Montanans with significant disabilities who are eligible for vocational rehabilitation services.

VRBS works with Montana colleges to recruit individuals from minority backgrounds and persons with significant disabilities. VRBS takes affirmative action to employ and advance in employment, qualified individuals with significant disabilities.

In Montana, Native Americans make up the largest minority population. Six Native American Section 121 projects are located on reservations and employ Native Americans as rehabilitation counselors. However, with the CSPD standard requiring education at the graduate level, the general VRBS program has difficulty recruiting qualified Native Americans for employment within the agency.

By developing a plan to assure adequate numbers of CRC counselors and by providing leadership training at all levels, VRBS is working to develop future leaders who will be ready to take over key positions as they are vacated. Towards this effort, VRBS has formed the VRBS Futures Group that will work directly with the current management staff of VRBS in the design and implementation of the process and format for case services to consumers. Staff participating on the VRBS Futures Group, will obtain the skills necessary to take VRBS into the future. The VRBS Futures Group is facilitated by a member of the VRBS leadership team.

The VRBS' Futures Group is composed of current staff who have been successfully employed by the agency for a minimum of two years, have completed specific prerequisite training in supervision and/or management and who are or have been, enrolled in approved leadership training, as finances allow.

Participation in the VRBS Futures Group involves a competitive application process and involves a three-year term for clients and two-year term for the leadership team facilitator. Successful completion of a three-year term in the VRBS Futures Group has a proposed equivalency of two years of management experience within VRBS. Allowing staff to participate in real-life problem solving and real-life improvements to our current service delivery system serves the agency well and provides a mechanism for honing the skills of future leaders within the agency.

Presently, staff members are taking advantage of regularly offered video conference training on a variety of pertinent topics.

### 3. PERSONNEL STANDARDS

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

#### A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

VRBS has a system for ensuring the yearly evaluation of each counselor's CSPD status (to determine percentage of "qualified" staff") and performance of each staff member. The performance evaluation of rehabilitation counselors and other professionals is paramount to our efforts to ensure quality services to Montanans with disabilities. Our evaluations are tied to specific performance activities leading to those quality services.

The standard for counseling staff in Montana is to qualify to sit for the CRC examination or to have qualified to sit in the past, with the completion of additional coursework---and then to complete such coursework. Initially, VRBS had targeted 2007 as the year in which we would meet our CSPD goal of having 100% of its counselors meet the standard of qualifying to sit for the CRC examination. Unfortunately, as more experienced employees retire, there is not a ready pool of qualified professionals to hire into those vacated positions.

In "difficult to recruit for positions" VRBS will hire individuals with a baccalaureate degree in a related field (at the minimum) and develop a CSPD plan to ensure that the employee moves toward qualifying to sit for the CRC examination. It typically takes an individual hired with a baccalaureate degree three year to meet the standard. Blind and Low Vision Services instructional staff must be eligible to hold certification from the Academy for Certification of Vision Rehabilitation and Education Professionals.

In fiscal year 2017, VRBS identified 13 rehabilitation counselors who require graduate level training to qualify to sit for the CRC examination. Of the thirteen, 4 have completed the requisite education and are scheduled to take the CRC exam in March and July of 2018 3 are in school completing their master's degrees, 3 are completing a second master's under the Category R provision, 2 are researching and applying to graduate school, and 1 is in a medical hold status. The following table summarizes the data noted above.

Status	Number
Scheduled to sit for exam in 2018	4
In school, completing 1 <sup>st</sup> Master's	3
In school, completing 2 <sup>nd</sup> Master's- Category R	3
Researching/Applying for Graduate School	2
CSPD Plan on Medical Hold	1

VRBS anticipates that the distance education graduate programs will take the average rehabilitation counselor two to three years to complete. Without the distance-learning component, VRBS would be unable to set this plan in motion, as this allows for the counselor to complete their graduate education while remaining on the job. Through continued use of the distance education programs, VRBS anticipates maintaining/ increasing the numbers of CRCs over the next several years. The average number of VRBS' counselors who complete a graduate program in rehabilitation counseling is three per year. This trend has been observed over the last decade.

CSPD requirements dictate graduate level coursework. CSPD funds are also written into the current in-service training grant; however, Rehabilitation Services Administration scholarships are utilized whenever available.

**B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.**

VRBS believes that WIOA provides significant guidance on what constitutes 21st century VR practice. There are three new pillars to VR practice that counselors need to develop skills in:

- skills to address the evolving needs of businesses and labor force to meet the demands of a changing society and work place.
- skills to assist the persons with the most significant disabilities find jobs in competitive integrated settings.
- skills to work youth and high school students with disabilities to be prepared to competitively enter the world of work and post-secondary education.

VRBS understands that current and past training programs do not adequately address the new VR priorities of WIOA. Most of the current staff were not adequately prepared to address these priorities. It will take years for the traditional pre-service programs to adequately integrate these areas into their curriculum. Therefore, new staff will not be coming with these skills in the near future. Therefore, VRBS recognizes that for the foreseeable future in-service training needs set these issues as a priority. Also, close relationships must be built with the new national technical assistance centers that will be the leaders in identifying and disseminating the sources of information and best practices to address the new priorities. VRBS has bi monthly videoconferencing to provide in-service training and annual all staff trainings. VRBS plans to focus in-service resources on the new priorities and to utilize the national technical resource centers and other resources to obtain the emerging 21st century content and resources for these trainings.

#### 4. STAFF DEVELOPMENT.

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

##### A. SYSTEM OF STAFF DEVELOPMENT

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

VRBS performs a complete training needs assessment on all employees each year. VRBS identifies, through this process, major themes for training large groups as well as individualized training topics identified by staff and their supervisors. This assessment provides for a comprehensive set of training topics that remain fluid as emerging priorities are developed either at the national level or within the state. It is also used to provide information for conference planning purposes to associations such as the Montana Association for Rehabilitation, Montana Youth Transitions and the Association for Education and Rehabilitation of the Blind and Visually Impaired.

The VRBS HRD Specialist has responsibility for in-service training, the preparation of Montana's in-service training grant, and for overall coordination of the agency's comprehensive system for personnel development. VRBS also completes CSPD assessments on all counselors in a plan to meet the standard. Each year, staff who do not meet the standard are counseled and their annual course of action is determined and documented. Of course, the purpose of this annual review is to continue to move counselors toward meeting the standard. Once counselors meet the standard by qualifying to sit for the CRC examination they receive a pay raise, with an additional raise successful at completion of the CRC exam.

VRBS places a heavy emphasis on leadership at all levels and continuous improvement of staff skills at all levels. Leadership and training related to succession planning are available to all staff in one form or another. VRBS currently utilizes the Emerging Leaders Series through the Center for Continuing Education in Rehabilitation at Western Washington University and the state's leadership program for staff development. Building on the formalized leadership/management training available to staff through the afore mentioned programs, VRBS helps future leaders hone their skills through participation in the VRBS Futures Group. Additionally, there is emphasis on training in the areas of rehabilitation technology, informed choice, cultural diversity, current rehabilitation trends and disability information, and the Rehabilitation Act with its amendments. Training on topics such as rehabilitation technology, assessment, vocational counseling, and job placement is held at annual meetings such as the annual spring conference and Montana Association for Rehabilitation conference. Also, VRBS has initiated web based trainings on areas where training has been identified as a need. For the web-based trainings, either agency personnel or Montana based resources are utilized to provide the training. In addition, staff frequently participate in online trainings offered by a variety of resources. Often a representative of the agency is sent to out-of-state training to bring back and disseminate significant knowledge from research and other sources.



## B. ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE

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

As mentioned previously, VRBS intends to develop good working relationships with the new national technical assistance centers to keep up with emerging knowledge and best practices in their focus areas.

VRBS has contracted with the Rural Institute of the University of Montana to provide technical assistance to VRBS staff and Montana school districts on pre-employment transition services. The Rural Institute has staff with national reputations in this area.

## 5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

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

VRBS requires that rehabilitation counselors who are hired specifically to work with deaf and hard of hearing consumers have fluent sign language skills. Sign language interpreters for the deaf or hard of hearing are also provided when necessary. Other accommodations, such as documentation in alternative formats, are routinely made by VRBS. The policy of VRBS is to consult with the consumer to determine the most appropriate mode of communication.

Montana has a relay system for telephone communication with consumers who are deaf or hard of hearing and all offices are equipped with Ubi-Duos. Three offices (with the highest numbers of deaf/hard of hearing clients) have video phones for enhanced communication. The Montana Telecommunications Access Program is housed in the Disability Employment and Transitions Division and lends tremendous technical support to the staff of VRBS working with sensory impaired consumers. BLVS has also developed a full time Assistive Technology Specialist position. VRBS purchases interpreter services as needed by consumers.

The issue of consumers whose primary language is not English is a very rare issue in Montana. The issue is most likely to occur with Native American consumers who are the largest minority group in Montana. Even with this group, it is quite rare to have a consumer whose primary language is not English. Montana is fortunate to have six Native American vocational rehabilitation projects (funded through section 121 of the Rehabilitation Act) located in Montana. The local offices have good working relationships with the Native American projects and they are an excellent resource for assisting Native Americans who are not English speakers.

The Billings region has the largest population of Spanish speaking consumers and they have utilized assistance from the local migrant council when working with consumers whose primary language is Spanish.

In other very rare instances when working with consumers who speak other languages as their primary language, counselors have been able to utilize family members of the



consumer to interpret. Also, Montana has colleges and universities that offer a variety of foreign languages and if necessary it may be possible to utilize instructors or students from these programs to assist with interpreting or identifying community resources to assist with communication.

## 6. COORDINATION OF PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

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

The VRBS CSPD coordinates with the requirements of the CSPD under the Individuals with Disabilities Education Act in that both necessitate the following.

- In-service training of all personnel.
- A system for determining, on an annual basis:
  - The number and type of personnel needed
  - Which institutions of higher education in the state are preparing vocational rehabilitation personnel, the number of students enrolled in the programs, the number who graduate with credentials to qualify for employment with the agency, and
  - When to recruit, prepare, and retain qualified personnel, including personnel from minority backgrounds, and personnel with significant disabilities.
- A description of the procedures and activities that the State of Montana will take to ensure an adequate supply of qualified personnel.
- Detailed in-service training procedures to ensure that all personnel have access to training resources to enhance their professional skills, ultimately improving service delivery to consumers

The HRD Specialist continues to explore ways of coordinating training between VRBS, OPI, and the schools. Across the state, there are a number of transition fairs held annually at the high schools. VRBS presents at the transition fairs, and provides information regarding VRBS and how to access those services.

## J. STATEWIDE ASSESSMENT

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(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;

Each VR program is required to conduct a statewide assessment every 3 years. The currently completed 3-year 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 establish develop or improve community rehabilitation programs, and the rehabilitation needs of individuals with disabilities, particularly the vocational rehabilitation needs of:

- Individuals with the most significant disabilities including their needs for supported employment services;
- Individuals who are minorities and individuals with disabilities who have not been served or are underserved by VRBS;
- Individuals with disabilities served through other components of the statewide workforce investment system;

Three types of input were analyzed:

- Direct inputs such as the consumer satisfaction survey, VRBS counselor survey, focus forums (small regional groups of consumers), consumer survey related to status 30 contacts, and the public hearings.
- Other indicators such as the Client Assistance Program report of needs, SRC input, demographic trends, involvement with the State Employment Leadership Network (SELN), program evaluation tools (such as the standards and indicators and federal annual report), and our current strategic plan summary.
- Priorities from other programs such as the federal priorities, and legislative priorities.

#### **Method:**

Consumer satisfaction surveys are sent to consumers of VRBS each three years of the assessment: approximately 1,750 surveys are sent out each year. The survey response rate is between 20 and 25 percent each year.

Public hearings are held of the three years of the assessment, 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. Teleconferencing sites are located in Billings, Bozeman, Butte, Great Falls, Glasgow, Helena, Kalispell, Miles City and Missoula. Tribal sites are being considered the for the present round of solicitation of comments. Participation at the statewide public hearings typically ranges between 60 and 100 clients. Written and electronic comments are also accepted.

#### B. WHO ARE MINORITIES;

According to 2010 census data 89.4% of Montana's population is white and 6.3% is American Indian or Alaska Native persons. Persons reporting two or more races made up

2.5% of the population. In Montana, for most persons reporting two or more races, at least one of the races would be American Indian. Other minorities make up the remaining 1.8% of the population. Six Section 121 American Indian VR projects are located in Montana, covering six of the seven reservations located in Montana. Although most American Indian on or near the reservation prefer to be served by their Section 121 project, a number are served by VRBS or by both VRBS and the Section 121 project. In FY 2013, VRBS served 1,425 minority consumers (17.6% of the caseload), of which 719 were American Indian, 326 were of two or more races, 81 African Americans, 29 were Asian American, 250 were Hispanic/Latino and 20 were Hawaiian or Pacific Islander. The majority of American Indian Montanans live on reservations. Many more live just outside the reservation. However, Montana does have a number of urban areas that have significant numbers of American Indian residents. This population is served by American Indian service centers (Billings, Butte, Helena, Missoula, and Great Falls). Staff of VRBS maintain contact with the American Indian Services Centers to seek appropriate referrals and to obtain information on the needs of American Indians with disabilities residing away from reservations. Input on issues related to serving American Indians with disabilities was received from Section 121 Directors and public hearings conducted on reservations. Input received included:

- The Crow Nation should be encouraged to apply for a tribal vocational rehabilitation project
- There is a need for independent living services on the reservations
- There is a need for assistance related to the Ticket to Work Program
- Montana VRBS' counselors need to make appropriate follow up when there are referrals from a tribal vocational rehabilitation project
- There is a need for assistance related to assistive technology
- Transportation difficulties limit access to employment on reservations
- It is difficult to develop plans for employment due to lack of resources on the reservation
- There are problems getting good documentation of disability. Indian Health records are available, but often there is a wealth of information that is provided with little of the information relevant to the person's disabling conditions, particularly impediments to employment. Setting up appointments to get adequate documentation is difficult. Psychological testing and other specialty testing often requires going to a site off the reservation
- There is a lack of job opportunities on the reservations and many of the consumers are not interested in leaving the reservation
- There is a lack of sheltered and supported employment opportunities on reservations
- There is also some difficulty serving hearing impaired persons on the reservations, but on the Blackfeet reservation there have been some procedures developed that have been successful
- There needs to be assistance for helping tribal members develop their own businesses
- It is difficult to identify tribal members who have hidden disabilities

### C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

In recent years, the disability makeup of the VRBS caseload has significantly changed. In 1986, 69% of the consumers had physical disabilities, 19% had mental disabilities, and 12% had sensory disabilities. In 2013, 34% of the consumers had physical disabilities, 54% had mental disabilities, and 12% had sensory disabilities. The number of cases with mental disabilities has significantly increased, especially in areas like severe and persistent mental illness, learning disabilities and attention deficit hyperactivity disorder. While the numbers served have grown, the fact that many of the VRBS' staff have had less experience working with this population has led to the SRC considering consumers with mental disabilities an underserved group because VRBS counselors may not be able to provide the same level of

quality with this group of consumers. Findings of the comprehensive statewide needs assessment for individuals with mental disabilities including severe and persistent mental illness include:

- The need for more mental health centers to provide job placement and supported employment services
- More information regarding Social Security Work Incentives
- Improved transportation options
- Better communication between VRBS and the Addictive and Mental Disorders Division
- The need for a statewide task force to work on improving long-term follow along services for persons with mental disabilities

#### **D. WHO HAVE BEEN SERVED THROUGH OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM; AND**

Currently these efforts have been focused at the local level. VRBS staff are members of the local community management teams (CMTs). As members of these teams, VRBS staff offer consultation and technical assistance on disability issues as needed. Also, most of the enrolled CRPs are active members of the CMTs.

One need that VRBS provides the system is information on Social Security Work Incentives when the workforce development system has consumers receiving Social Security benefits.

#### **E. WHO ARE YOUTH WITH DISABILITIES AND STUDENTS WITH DISABILITIES, INCLUDING, AS APPROPRIATE, THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES OR OTHER TRANSITION SERVICES.**

While, assessing the needs of youth and students with disabilities, particularly in the pre-employment and transition services (Pre-ETS) area has been occurring to some degree. The new priority for this to be an area of assessment is new and comprehensive need assessment methods are still be developed.

However, the following needs are very apparent with what information has been gathered.

- Montana has a very unique school funding structure compared to other states. In Montana, most students with disabilities graduate at age either 18 or 19. There are very few school districts that serve students to age 21. Therefore, in Montana there is a need for developing a service structure outside the schools for youth with the most significant disabilities ages 19-21. In other states these are being provided in the schools for that age range. Unfortunately, Pre-ETS funding cannot be used for these services in Montana because the students are no longer in school.
- Further development and refinement of the Pre-ETS program is a very high need. Most of mechanisms for delivering these services were developed rapidly and full implementation and refinement is going to be an ongoing process over the next few years. However, VRBS has developed new strategies to address the challenges of providing services to students with disabilities who are spread out over a large geographic area, and continues to refine these strategies presently.
- VRBS is working with OPI to leverage of some that agency's data tools in order to work with all schools in the state in a more comprehensive manner that does not rely upon individual relationships and contacts. This work continues presently.

## 2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE; AND

Supported employment services are the primary emphasis of the VRBS and CRP relationship and were the focus of the needs assessment.

Issues identified to improve supported employment services include:

- 1) Expansion of services to rural and remote areas by the continued certification of private providers who meet VRBS' qualification levels for job assistance and supported employment services
- 2) Expansion of mental health providers as CRP's to serve those with severe and persistent mental illness
- 3) Planning for the needs of consumers requiring higher level of long-term supports was identified through participation with the Supported Employment Leadership Network (the employment first network of Montana).

## 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.

As mentioned previously the development and refinement of a comprehensive Pre-ETS delivery system is the greatest need for addressing these issues.

The main focus of the Pre-ETS system is contracts with individual school districts to carry out an individualized Pre-ETS work plan to meet the needs of the local area. Therefore, most Pre-ETS are going to be an integral part of the school's delivery of services provided under the Individuals with Disabilities Act.

It should be noted that the contracts with school districts clearly define the population of Pre-ETS is all students potentially eligible for VRBS services not just those served through the Individuals with Disabilities Act.

## K. ANNUAL ESTIMATES

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(Formerly known as Attachment 4.11(b)). Describe:

### 1. THE NUMBER OF INDIVIDUALS IN THE STATE WHO ARE ELIGIBLE FOR SERVICES;

According to data provided by the 2016 American Fact Finder, the latest data available, there are approximately 69,930 people with disabilities who are between the ages of 18 and 64 years of age residing in Montana.

### 2. THE NUMBER OF ELIGIBLE INDIVIDUALS WHO WILL RECEIVE SERVICES UNDER:

#### A. THE VR PROGRAM;

From this population data set, in FFY 2018 VRBS anticipates serving 4,300 clients at a case cost of \$11 million using Title I funding, with 800 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 FFY 2018.

#### C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION;

	Title I or Title VI	Estimated Funds	Estimated Number to be Served	Average Cost of Services
Priority Category One	Title I	\$8,200,000	2,750	\$2,981
Priority Category Two	Title I	\$2,000,000	1,000	\$2,000
Priority Category Three	Title I	\$500,000	300	\$1,666
Priority Category One	Title VI	\$300,000	200	\$1,500
Totals		\$11,000,000	4,250	\$2,588

For Federal Fiscal Year (FFY) 2018 VRBS estimates that total projected program costs for both administrative and client services funded under Title I and Title VI-B will be \$17,000,000 including both federal and non-federal funds, assuming additional Title I re-allotment funds will be available to be requested by the state. VRBS projects an estimated overall deficit for FFY 2018 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 2018 2000 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 2018 can be found in the table in Section 3.

## L. STATE GOALS AND PRIORITIES

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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.

Goal: Modernize the VRBS service delivery system to be consistent with WIOA requirements.

Priority 1:

VRBS will be a leader in services to youth with disabilities across the state of Montana, primarily through providing a strong base of pre-employment transition services (Pre-ETS) for Montana students with disabilities.

Priority 2:

Increase alignment with WIOA partners, with an emphasis on developing and enhancing services for employers. Note: Beginning with the 2017 2<sup>nd</sup> Qtr. The priority language changed from services to employers to services to businesses. The language change reflects how businesses see and refer to themselves.

Priority 3

Build and maintain the capacity necessary to provide persons with disabilities employed in sub-minimum/segregated wage jobs opportunities to choose and achieve competitive, integrated employment. (Section 511 of WIOA).

### 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 and the SRC meet regularly to look at the results of the statewide needs assessment, and the discussions were used in the state plan.

#### B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

VRBS management staff, SRC, the Statewide Independent Living Council, and the Client Assistance Program representative met to discuss the draft of the strategic plan, and make final recommendations.



This review included a review of the standards and indicators and yearly performance related to the standards and indicators.

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND  
EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS  
RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDING AND  
RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER  
SECTION 107.

Multiple reports and the finding and recommendations of RSA monitoring were presented to the council over the course of meetings preceding the development of the strategic plan and were considered by the council when providing input to the state plan. Not all of the challenges discovered during monitoring have been addressed, and planning continues presently.

## M. ORDER OF SELECTION

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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.

Since Montana's Vocational Rehabilitation and Blind Services program (VRBS) does not believe it will be able to serve all eligible individuals with the available financial resources, it has 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. All categories are currently closed. All of the category closures were made because BLVS believed that it could not serve all eligible individuals with the available financial and/or personal service resources. This belief remains in place as well for Federal Fiscal Year (FFY) 2018.

The following paragraphs below present our justification by describing the factors that impact our belief that remaining in an order of selection is necessary.

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 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.

Specifically, according to the Montana Office of Public Instruction's data, the State of Montana has 413 public school districts which contain 171 high schools. In order to create

the necessary infrastructure to provide pre-employment transition services, which previously has not existed prior to WIOA, members of the VRBS field staff travel to varying high schools or district offices to meet with school personnel, many of whom are located in rural environments. We anticipate that this will result in a higher backlog of traditional case services.

Additionally, the trend of the availability of re-allotment Title I funds nationally may indicate that additional federal funds might not be available in the full amount requested by the state even if the non-federal matching funds are sufficient and available. This assumption is based on the national data provided by RSA when comparing year-over-year the net amount relinquished versus requested in aggregate for all grant recipients through FFY 2017's re-allotment period. This is another indicator to VRBS that remaining in an order of selection status is merited.

VRBS anticipates having all categories remaining closed through fiscal year 2018.

### 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 receiving services	Estimated number of individuals who will exit without employment after receiving services	Time within which goals are to be achieved
1	1,717	317	325	Immediately to one year
2	922	129	135	Immediately to two years
3	155	36	40	Suspended indefinitely

### 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, highest to lowest; 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 has chosen to serve eligible individual, regardless of any established order of selection, who require specific services or equipment to maintain employment through December 31, 2017.

Effective January 1, 2018 the DSU will no longer waive established order of selection for individuals who require specific services or equipment to maintain employment.

## N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS.

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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 integrated competitive employment.

Supported employment services are provided on a statewide basis through the Title VI, Part B funds. Supported employment in competitive/integrated work settings with ongoing support services for individuals with the most significant disabilities for whom competitive employment has not traditionally occurred, or for whom competitive employment has been interrupted or intermittent as a result of a significant disability. 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 the first priority for supported employment services will be on the job supports. The second priority will be services such as transportation and work clothing.

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 been aware of and used customized employment techniques for some time, however with the passage of WIOA, VRBS plans to emphasize these techniques to a greater degree.

### 2. DESCRIBE THE ACTIVITIES TO BE CONDUCTED, WITH FUNDS RESERVED PURSUANT TO SECTION 603(D), FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING:

#### A. THE PROVISION OF EXTENDED SERVICES FOR A PERIOD NOT TO EXCEED 4 YEARS; AND

At this time the planned activities for utilization of funds reserved for youth with disabilities is expected to mirror the past planned activities for utilization of the funds in general. A review of previous year's expenditures indication that the youth reserve would have been appropriately expended if such a reserve had been in place at that time. Therefore, there are no special plans for the utilization of the reserve.

In the future, the option of extended services for youth may be utilized, but at this time there are other long-term funding options for all youth needing those services without VRBS utilizing the new option.

**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 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 - Rocky Mountain Rehab
- B. Mental Health cooperative agreement
- C. Developmental Disabilities cooperative agreement
- 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

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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. Activities supported specifically by innovation and expansion funds include the consumer satisfaction survey and meetings for the State Rehabilitation Council (SRC) and the Statewide Independent Living Council.

Other activities related to expanding services are detailed in 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.

MonTECH (the Montana State operator for the state grant AT program) implemented a process of demonstrating equipment and assessing technology needs through the use of video conferencing. VRBS hopes to assist with expansion of these efforts through expanding the computer communication technology available in VRBS offices. Each VRBS office has been provided with a variety of assistive technology items that are commonly used by persons with disabilities. MonTECH will be able to assist with the demonstrations of this equipment through the video conferencing systems.

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 equipment before purchase. MonTECH provides additional demonstration equipment to the three BLVS offices outside of Missoula (MonTECH is located in Missoula and their office supplements the BLVS resources for that region).

### 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 THAT WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM.

American Indians represent the only significant minority group in Montana. Montana has seven reservations and some of the reservations are home to more than one tribe. Each reservation has an autonomous governing body. In addition, the Little Shell Chippewa Tribe is granted Montana recognition, but not federal recognition and does not have a reservation. VRBS has counselors who serve consumers on each reservation. These counselors

coordinate with Section 121 project staff to identify potential referrals and resources. American Indians with disabilities living on reservations face unique challenges.

- First, they are eligible for a combination of tribal, federal, and state programs to meet their vocational and health needs. This requires extensive coordination and cooperation between agencies.
- Secondly, they are faced with significant cultural and economic barriers. Unemployment on these reservations varies from 4.7%% to 11.7%, while Montana's statewide unemployment rate is 3.7% (Montana Department of Labor and Industry website). Today there are very few private or self-employment opportunities on reservations; most employment comes through tribal and federal programs.

Six Section 121 vocational rehabilitation projects (Confederated Salish & Kootenai, Blackfeet, Chippewa Cree, Assiniboine Sioux, Fort Belknap, and Chief Dull Knife College) are located in Montana. This gives improved access to vocational rehabilitation services for American Indians with disabilities residing on or near reservations served by the projects. Section 121 projects have a better grasp of the cultural and service delivery barriers that exist on reservations and can help support VRBS counselors as needed.

VRBS' counselors assigned to these six reservations coordinate with each project staff as needed. In addition, the VRBS program manager visits each 121 projects annually and provides technical assistance when requested.

In some cases, VRBS has access to specialized programs, or services, which are not always found on reservations. VRBS works to network, coordinate, offer technical assistance, and provide training opportunities for Section 121 project staff to ensure consumers with disabilities have access to the full range of vocational rehabilitation services. Cooperative agreements have been completed with each of the Section 121 projects and are monitored on an annual basis.

In order to ensure that VRBS is meeting the needs of American Indians that do not live on or near the reservation, VRBS staff meet with: Missoula Native American Center, Helena Indian Alliance, Great Falls Indian Family Health Center, Butte - North American Indian Alliance, and the Indian Health Board of Billings Clinic. VRBS provides program referral information regarding VRBS and the transitions services for youth. During the fall 2013 SRC meeting a group from the Helena American Indian Pow Wow organization provided a presentation on issues related to urban American Indians.

#### **Identification of Outreach Procedures Used to Identify and Serve Individuals with Disabilities who have been Unserved or Underserved by VRBS**

For several years VRBS has considered Native Americans as the unserved/underserved population of the state. In addition, VRBS conducted an assessment of case work data to determine other potential unserved/underserved populations and will be developing outreach strategies for the groups identified.

#### **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



have 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, Moving On, Project Search, Easter Seals volunteer experience program, Montana Center for Inclusive Education's Virtual college peer mentoring program, and exploring specialized 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.

#### 5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, O R IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

VRBS continually assesses the need to establish, develop and improve community rehabilitation programs through town hall meetings, break out listening session at the Montana Association for Rehabilitation Conference, the State Employment Leadership Network meetings and ongoing informal communication. The need areas being addressed at this time include:

1. Expansion of 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
2. Expansion of mental health providers as CRP's to serve those with severe and persistent mental illness

In the past eight years, through the collaboration with multiple agencies, CRPs, and consumers involved with the State Employment Leadership Network many initiatives are under consideration that will increase the number of persons with significant intellectual disabilities to be placed in competitive community employment. A significant number of the initiatives under consideration include assisting CRP services to be prepared to serve this population. One initiative that has been started is to develop web based training for vocational services staff of CRPs that is required by VRBS. This training was used with success, but has been temporarily halted to make updates related to WIOA.

#### 6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES U N D E R 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.

#### 7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES.

As a core partner, VR 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.
- 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.

## 8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO :

### A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

The management staff of VRBS meet regularly with representatives of the SRC to discuss comprehensive needs and priorities for the upcoming year. The group looked at formal input from public hearings, focus forums, VRB staff, consumer satisfaction survey, Client Assistance Program, SRC, state and national sources (CSAVR, RSA policy changes, legislative activities, umbrella agency activities), and other surveys. Information from this meeting is used to plan for the next three years and for the legislature. VRBS and the SRC have developed the goals, objectives, and strategies.

For the strategic plan covering FFY 2017 through FFY2020, the format of strategies was changed. In past plans, strategies were connected to specific priorities or objectives. In reviewing this plan's strategies, it was determined that several strategies applied to multiple priorities. Therefore, the strategies will not be listed with specific priorities. Rather, the priorities will be listed numerically and then after the strategy, the priorities that are expected to be impacted will be listed.

#### VRBS' STRATEGIC PLAN 2017 -2020

### **Goal: Modernize the VRBS service delivery system to be consistent with WIOA requirements.**

#### **Priority 1:**

**VRBS will be a leader in services to youth with disabilities across the state of Montana, primarily through providing a strong base of pre-employment transition services (Pre-ETS) for Montana students with disabilities.**

Strategies for achieving Priority 1:

- 1.A. Increase the number of school district Pre-ETS contracts completed annually for the next three years.
- 1.B. Increase and expand specialized programs, such as Montana Youth Leadership Forum and Movin' On Montana, that offer Pre-ETS services outside of the schools annually over the next three years.
- 1.C. Increase the amount of time counselors spend on interaction with students with disabilities, expand the types of activities involving counselor/student interactions.

- 1.D. Expand Pre-ETS contracts with schools on or near reservations and schools serving youth in treatment and detention facilities annually for next three years.
- 1.E. Develop and expand annually Pre-ETS services for American Indian students not residing on a reservation. These services will focus on transition issues unique to this population.

#### **Priority 2:**

**Increase alignment with WIOA partners, with an emphasis on developing and enhancing services for employers. Note: Beginning with the 2017 2<sup>nd</sup> Qtr. The priority language changed from services to employers to services to businesses. The language change reflects how businesses see and refer to themselves.**

Strategies for achieving Priority 2:

- 2. A. Increase employers' awareness of the untapped pool of talented workers with disabilities seeking employment throughout Montana.
  - 2. B. Provide consultation, training and resources to WIOA partners and employers to dispel the stereotypes of disability and focus on the strengths, abilities and unique perspectives people with disabilities bring to the workforce.
  - 2. C. Increasing employment of people with disabilities in state government by working with WIOA partners to implement practices of the National Governor's Association Chair initiative; "A Better Bottom Line: Employing People with Disabilities".
  - 2. D. Work with WIOA partners to increase partnerships with businesses to develop or expand work experience, internship, apprenticeship and other job entry programs for Montanans with disabilities. This will include Montana Workforce specific programs such as RevUp and HealthCARE Montana.
  - 2. E. Ensure VRBS consumers who can benefit from services offered by WIOA partners are made aware of the services and can access the services through a consumer-friendly process, such increased use of the Montana Career Information System (MCIS).
- VRBS provided guidance to staff on using MCIS as an entry step to the VRBS program for PreETS consumers.
- 2. F. Increase VRBS counselors' knowledge of labor market trends and "in-demand" jobs to assist VR consumers in career selection and training options that meet the needs of a job-driven economy and increase their employment options.

#### **Priority 3**

**Build and maintain the capacity necessary to provide persons with disabilities employed in sub-minimum/segregated wage jobs opportunities to choose and achieve competitive, integrated employment. (Section 511 of WIOA).**

Strategies for achieving Priority 3:

- 3. A. Train VRBS staff in the procedures necessary to comply with Section 511 of WIOA.

- 3. B. Provide guidance to 14 (c) sub minimum wage employers on the procedures to comply with Section 511 of WIOA.
- 3. C. Provide guidance to school personnel on procedures and documentation necessary to comply with Section 511 of WIOA.
- 3. D. To facilitate informed choice, VRBS will contract with Montana's Centers for Independent Living to provide information and career counseling services about competitive, integrated employment options every six months during the year following the July activation of Section 511 or an individual's first year of sub-minimum wage employment and annually thereafter.
- 3. E. For individuals working for a 14 (c) employer who choose to pursue competitive, integrated employment, VRBS will build and maintain the capacity to provide comprehensive VR services, including evidence-based services, for this expanded caseload.
- 3. F. VRBS will develop or revise old agreements with the Developmental Services Division, Addictive and Mental Health Disorders Division, Medicaid, Senior and Long-Term Care Division and the Office of Public Instruction to document the alignment with VRBS involving meeting requirements of WIOA.

## **B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND**

Activities supported specifically by innovation and expansion funds include the consumer satisfaction survey and meetings for the State Rehabilitation Council (SRC) and the Statewide Independent Living Council.

## **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.**

Northeastern Montana is a very expansive, but thinly populated area. With the new emphasis on serving youth in high school the one office (two counselors) that covers the area had 30 high schools to cover, with only 1 high school in the town the office was located and the other 29 high schools involving commutes of up to 303 miles one way. The strategy to solve this was to move a counselor position from another office to the Northeastern Montana office.

All Montana offices have rural areas to cover and attending IEP meetings was difficult throughout the state and now counselors are working with schools to attend the meetings by teleconferencing.

It is very difficult for Montana to add new positions in a state agency. Therefore, with the new requirement for comprehensive Pre-ETS services statewide the strategy of contracting with school districts was developed.

When an enrolled CRP is not available to provide supported employment services in a remote area, VRBS contracts with a local person with appropriate skills such as retired teachers and human service professionals to provide the service in the local area.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND  
SUPPORTED EMPLOYMENT GOALS

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Describe:

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED

OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS.

The following is the complete evaluation report and within the report there are strategies identified that contributed to achievement of various priorities.

**Goal: Modernize the VRBS service delivery system to be consistent with WIOA requirements.**

**Priority 1:**

**VRBS will be a leader in services to youth with disabilities across the state of Montana, primarily through providing a strong base of pre-employment transition services (Pre-ETS) for Montana students with disabilities.**

Strategies for achieving Priority 1:

1.A. Increase the number of school district Pre-ETS contracts completed annually for the next three years.

**2017 Qtr. # 1:** No new school district contracts were completed during this time frame. With the publication of the final regulations, our agency had more information about data elements and 511 subminimum wage requirements to include as we developed the new contract template for Federal Fiscal Year 2017.

**2017 Qtr. #2:** Eighty-three school districts have completed contracts with Vocational Rehabilitation and Blind Services (VRBS) effective February 6, 2017.

**2017 Qtr. #3:** In March of 2017, VBS experienced significant budget constraints and were directed not to complete any more school contracts. At this time, we have completed contracts with 92 schools serving approximately 4000 students.

1.B. Increase and expand specialized programs, such as Montana Youth Leadership Forum and Movin' On Montana, that offer Pre-ETS services outside of the schools annually over the next three years.

**2017 Qtr. #1:** The new contract for Montana Youth Leadership Forum (MYLF) includes expanded programs such as MYLF Minis and MYLF Step II. The Minis are condensed versions of the traditional MYLF Program and are offered in rural locations. The Step II program is offered to students who completed MYLF or Minis and provides more in-depth follow-up along with Community Job Shadowing opportunities.

The Movin' On Montana program was expanded during this time period to provide two sessions at the University of Montana. Staff from Montana State University-Billings attended the U of M session to prepare them to offer a session at MSU-B next summer. VRBS funded an Introduction to College Summer program on the U of M campus to provide work-based

learning, career readiness training, and post-secondary exploration to students with disabilities.

VRBS also provided funding through Montana Independent Living Project to give high school students with disabilities the opportunity to participate in Green Corps a farm work experience Program at a community garden in Helena.

**2017 Qtr. #2:** VRBS had a webinar recently to discuss Pre-Employment Transition Services (Pre-ETS) with Community Rehabilitation Programs and other providers. The CRP's and other providers will have an opportunity to complete a contract, so they can offer Pre-ETS on a fee for service basis. Volunteers will participate in a Focus Group to provide feedback on the proposed Pre-ETS provider contract and fees.

VRBS has met with leaders from the Jobs for Montana Graduates (JMG) program. JMG has submitted a proposal to contract with VRBS to provide Pre-ETS in the schools. Further research is being done on this proposal.

VRBS completed contracts with the following programs that will be providing Pre-ETS this year: Montana Youth Leadership Forum (MYLF), Movin' On programs at the University of Montana (UM) and Montana State University-Billings (MSU-B), Introduction to College expanded year-round program at UM and E-mentoring at MSU-B. VRBS is also providing funding for the Montana Youth Transition program (MYT).

**2017 Qtr. #3:** A Pre-ETS draft contract template for providers was developed and shared with the Community Rehabilitation Programs and Independent Living Programs. The draft was discussed in a CRP Focus Group and feedback was gathered. An Acquisition Planning and Implementation Form (API) was submitted to the Director's Office for approval. No decision has been made regarding the API Form that was submitted. VRBS has not received permission to move forward with renewal of any of the Pre-ETS "Special Projects" contracts or school contracts. We have been informed that Pre-ETS may be provided to schools in the upcoming year through the Jobs for Montana's Graduates (JMG) Program in the Department of Labor.

1.C. Increase the amount of time counselors spend on interaction with students with disabilities, expand the types of activities involving counselor/student interactions.

**2017 Qtr. #1:** VRBS staff will be encouraged to arrange and facilitate services to groups as an effective way to increase interactions with youth.

VRBS staff will be involved with MYLF MINIS conducted in their area. The involvement will include planning, recruitment and participation in the activity.

Members of the Leadership Team met with all of the VR offices and Pre-ETS Technical Assistance Center (Pre-ETS TAC) liaisons during the summer months. In these meetings, staff were able to talk about expanding counselor/student interactions and activities in the schools. This was also discussed in the recent Web-ex training on youth services.

**2017 Qtr. #2:** The Youth Services Team will discuss strategies to increase the amount of time counselors spend on interaction with students with disabilities in their upcoming team meeting. This has also been a topic in recent Pre-ETS TAC Conference Calls. Many counselors attended the Montana Youth Transitions Conference this fall which included sessions on working with students with disabilities in a classroom setting.

**2017 Qtr. #3:** The Montana Council for Exceptional Children (MCEC) conference featured a VRBS keynote presentation sharing how a counselor worked closely with a classroom teacher to provide Pre-ETS to students. The presentation included another counselor

discussing her experience teaching a job preparation class in the local high school. The Pre-ETS TAC met with VRBS counselors in various offices to discuss strategies to provide Pre-Employment Transition Services. The Pre-ETS TAC also presented in a Webinar about Pre-ETS activities that VRBS Counselors could do in a classroom setting. This Webinar included a list of training opportunities and resources for counselors to use for students with disabilities.

1.D. Expand Pre-ETS contracts with schools on or near reservations and schools serving youth in treatment and detention facilities annually for next three years.

**2017 Qtr. #1:** The Billings VRBS Office was able to develop a Pre-ETS contract with the Yellowstone Boys and Girls Ranch which serves youth with disabilities in a specialized treatment program. VRBS staff and Pre-ETS TAC geographic leads have already contacted many schools that are on or near reservations. We are seeing a great deal of initial interest from these schools in working with us and developing Pre-ETS contracts.

**2017 Qtr. #2:** The following schools on or near reservations have completed contracts with VRBS as of February 6, 2017: Lame Deer, St. Ignatius, Valier, Browning, Polson, and Charlo.

**2017 Qtr. #3:** Along with the schools listed above, the schools in Pablo and Hardin also developed contracts with VRBS before the opportunity was no longer available. The school in Poplar was in the process of developing a contract but was not able to finalize the document before VRBS was asked to stop developing any further contracts.

1.E. Develop and expand annually Pre-ETS services for American Indian students not residing on a reservation. These services will focus on transition issues unique to this population.

**2017 Qtr. #1:** The Pre-ETS TAC/VR Staff Annual Meeting included a presentation from Mandy Smoker Broaddus who provided staff with an Introduction to Indian Education at OPI. Frank Podobnik and Dick Trerise from OPI also shared their perspectives on providing Pre-ETS to American Indian student. The group discussed recruiting Tribal Schools for Pre-ETS and working with Tribal VR 121 programs. A taskforce was formed to address the special issues around this topic.

**2017 Qtr. #3:** The Little Shell band of the Chippewa Tribe is a state recognized tribe without a designated reservation in Montana. There are over 4,000 enrolled members within the state, many of which live in the Great Falls and surrounding area. The Pre-ETS contracts with Great Falls and the surrounding communities allow these schools an opportunity to provide Pre-ETS to Native American Students with disabilities. There are many specialized services for Native American Students in the Great Falls School system. The Counselor Supervisors and Leadership team participated in a meeting with the Targeted Communities Technical Assistance Center where there was discussion and training that was unique to the American Indian population.

## **Priority 2:**

**Increase alignment with WIOA partners, with an emphasis on developing and enhancing services for employers. Note: Beginning with the 2017 2<sup>nd</sup> Qtr. The priority language changed from services to employers to services to businesses. The language change reflects how businesses see and refer to themselves.**

Strategies for achieving Priority 2:

2. A. Increase employers' awareness of the untapped pool of talented workers with



disabilities seeking employment throughout Montana.

**2017 Qtr. #1:** The VRBS Employer Services Specialist and Billings office supervisor assisted with a presentation at the Billings Job Service on September 9<sup>th</sup>. It was the JSEC's Lunch and Learn series which featured two local employers who shared their positive experiences hiring and employing individuals with disabilities.

**2017 Qtr. #2:** Members of the VRBS Business Services Team have joined their local Chamber of Commerce, Job Service Employer Committees, and Society for Human Resource Management in their local communities. By joining these organizing and attending meetings the businesses involved are being exposed more and more to our agency and what we have to offer.

**2017 Qtr. #3:** VRBS and the Department of Labor and Industry (DL&I) began discussions related to VRBS staff being able to directly access DL&I case management system (MWORKS) for the purposes of recording data related to services to businesses. By inputting contacts and other information into the same system coordination of services to businesses would be enhanced.

**2017 Qtr. #4:** VRBS and DL&I completed negotiations for VRBS staff to be able to access and input with the MWORKS system. Training was initiated for VRBS staff to be able to work on MWORKS.

2. B. Provide consultation, training and resources to WIOA partners and employers to dispel the stereotypes of disability and focus on the strengths, abilities and unique perspectives people with disabilities bring to the workforce.

**2017 Qtr. #1:** On September 21, 2016, VRBS organized and participated in a panel presentation at the National Governor's Association Beyond the Classroom Symposium. The panel was able to reach employers and other agency staff with information about the untapped labor pool of individual with disabilities. The panel shared about customized employment, resources and success stories.

**2017 Qtr. #2:** VRBS joined our WIOA partners on November 2 and 3 to receive training on how to provide training on 'Windmills'. Windmills is a high-impact attitudinal training program that integrates disability into the spectrum of diversity awareness. VRBS and our WIOA partners will now be providing these training to business in their communities.

**2017 Qtr. #3:** Guidance was given to all VRBS business team member to make contact with two businesses monthly to provide information and assist with issues such as the untapped pool of resources offered by persons with disabilities, customized employment and VRBS resources.

Local Windmills trainings were conducted.

**2017 Qtr. #4:** Local windmills training continued. At this time windmills training has been conducted in Great Falls, Libby and Kalispell.

2. C. Increasing employment of people with disabilities in state government by working with WIOA partners to implement practices of the National Governor's Association Chair initiative; "A Better Bottom Line: Employing People with Disabilities".

**2017 Qtr. #3:** A model was developed for internships within state agencies by VRBS. The model is being tested and formalized. In the near future the model will be presented to the Department of Administration to develop plans for use across the statewide network.

2. D. Work with WIOA partners to increase partnerships with businesses to develop or

expand work experience, internship, apprenticeship and other job entry programs for Montanans with disabilities. This will include Montana Workforce specific programs such as RevUp and HealthCARE Montana.

**2017 Qtr. #4:** Exploration began on the possibilities of VRBS moving from the Department of Public Health and Human Services to the DL&I. Should such a reorganization occur, it would greatly enhance VRBS's access to activities such as apprenticeships and the statewide Workforce specific programs.

2. E. Ensure VRBS consumers who can benefit from services offered by WIOA partners are made aware of the services and can access the services through a consumer-friendly process, such increased use of the Montana Career Information System (MCIS).

**2017 Qtr. #1:** On an ongoing basis, applicants to the VRBS program who are not eligible or are on a waiting list are provided resource referrals to WIOA partner programs.

**2017 Qtr. #3:** A VRBS counselor adapted the guide to using the MCIS system to fit VRBS terminology and procedures.

VRBS provided guidance to staff on using MCIS as an entry step to the VRBS program for PreETS consumers.

**2017 Qtr. #4:** As mentioned previously exploration of a reorganization that would combine VRBS and DL&I was initiated. Such a reorganization would enhance the possibilities of VRBS consumers accessing services across the WIOA network.

2. F. Increase VRBS counselors' knowledge of labor market trends and "in-demand" jobs to assist VR consumers in career selection and training options that meet the needs of a job-driven economy and increase their employment options.

**2017 Qtr. #4:** As mentioned previously, exploration began on the possibilities of VRBS moving from the Department of Public Health and Human Services to the DL&I. Should such a reorganization occur, it would greatly enhance VRBS's ability to share labor market information and local job trends with consumers.

### **Priority 3**

**Build and maintain the capacity necessary to provide persons with disabilities employed in sub-minimum/segregated wage jobs opportunities to choose and achieve competitive, integrated employment. (Section 511 of WIOA).**

Strategies for achieving Priority 3:

3. A. Train VRBS staff in the procedures necessary to comply with Section 511 of WIOA.

**2017 Qtr. #1:** A recent VRBS webinar on youth services included information about 511 and requirements for youth who are known to be seeking sub-minimum wages. This was discussed in relation to the responsibilities of the school, VRBS and the student. The training focused on the positive aspect of this WIOA regulation because it requires students to take a number of steps to try competitive integrated employment before they can work for a sub-minimum wage employer. Youth services 511 Training was also provided to the Statewide Aspire team via Web-ex.

**2017 Qtr. #2:** VRBS and CIL staff were provided training on conducting Career Counseling Information and Referral (CCIR) interviews on February 1. Only individuals working at sub-minimum wage under a 14(c) certificate will be interviewed. The 4 CILs have been contracted to conduct the interviews. They will submit the CCIR forms for either validation or referral to the Central office. Those interviewed who indicate their interest in moving to competitive integrated employment by signing the validation form will be referred to VRBS. VRBS will then proceed with the referral and contact those individuals to begin providing

services.

**2017 Qtr. #3:** The activity has been completed. VRBS, CIL, and ASPIRE staff have been trained.

3. B. Provide guidance to 14 (c) sub minimum wage employers on the procedures to comply with Section 511 of WIOA.

**2017 Qtr. #1:** 14(c) Certificate holders were sent a letter dated July 27, 2016 by the US Department of Labor outlining the procedures for Section 511 compliance. VRBS, working in conjunction with the contracted four Centers for Independent living will provide additional training and guidance.

**2017 Qtr. #2:** Employers have received letters and information from DOL on their responsibilities under Sec 511. VRBS staff have been responding to questions from employers and the CIL contractors regarding implementation of Sec. 511. WINTAC is being consulted for clarification on some of the questions being asked. Employers have been informed that only those working in segregated, sub-minimum wage employment will have CCIR interviews. No Workers hired on or after September 19, 2016 can be employed at sub-minimum wage unless they have met certain criteria through VR.

**2017 Qtr. #3:** The activity has been completed. Employers were notified as intended.

3. C. Provide guidance to school personnel on procedures and documentation necessary to comply with Section 511 of WIOA.

**2017 Qtr. #1:** The new Pre-ETS contract template for schools includes a section on the school's documentation requirements for students who are known to be seeking sub-minimum wage employment after graduation. The 511 changes to the contract are explained in a generic letter to Superintendents that can be used by each VRBS office. The contract and superintendent letter have also been shared with our contacts from the Office of Public Instruction.

3. D. To facilitate informed choice, VRBS will contract with Montana's Centers for Independent Living to provide information and career counseling services about competitive, integrated employment options every six months during the year following the July activation of Section 511 or an individual's first year of sub-minimum wage employment and annually thereafter.

**2017 Qtr. #1:** Contracts were sent to the four centers for independent living along with forms to record either verification or refusal of counseling services. The initial six-month review is due by the end of January 2017. The one-year review is due at the end of July 2017.

**2017 Qtr. #2:** The four CILs have been contracted to conduct the CCIR interviews and have begun doing so.

3. E. For individuals working for a 14 (c) employer who choose to pursue competitive, integrated employment, VRBS will build and maintain the capacity to provide comprehensive VR services, including evidence-based services, for this expanded caseload.

**2017 Qtr. 2:** Individuals working for a 14(c) employer who choose to pursue competitive integrated employment by signing the CCIR validation form are referred to VRBS. VRBS then makes contact with those individuals and initiates the process to provide VR services.

**2017 Qtr. 4:** Employees working for subminimum wage under a 14C certificate holder continue to be referred to VR if they request referral during the CCIR interviews. About 20%

of those interviewed have requested referrals.

As of July 12, 2017, 667 sub-minimum wage employees have been contacted and provided information.

3. F. VRBS will develop or revise old agreements with the Developmental Services Division, Addictive and Mental Health Disorders Division, Medicaid, Senior and Long-Term Care Division and the Office of Public Instruction to document the alignment with VRBS involving meeting requirements of WIOA.

**2017 Qtr. #4:** Work was initiated on a draft MOUS with Medicaid and the Office of Public Instruction.

## **B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.**

Factors that impeded the achievement of goals are imbedded in the report in the previous section.

### **2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:**

#### **A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS.**

VRBS continually assesses the need to establish, develop and improve CRPs. Among the need areas being addressed at this time are:

- Expansion of services to rural and remote areas by the continued enrollment of private providers who meet VRBS qualification levels for job placement and job coaching services. New providers are being developed in the northern Montana and in other remote areas of the state. Increasing the number of counselors serving the north-east section of the state has been a strategy that contributed to improvement in this area.
- Expansion of mental health providers as CRPs to serve those with severe and persistent mental illness VRBS continues to work on this issue, but there have been no new providers added in the last year. VRBS is working with an initiative of the Addictive and Mental Disorders Division to improve employment of persons with significant mental health disabilities. Some of the providers that the Addictive and Mental Disorders Division are developing as part of this initiative may become VRBS enrolled CRPs in the future. The project coordinator was a past IL program manager of this initiative was a past IL program manager and her understanding of VR contributed to this initiative working well with VR.
- VRBS in collaboration with the Developmental Disabilities Program developed an on-line training to be required of all providers. This provides a core set of information and techniques for all providers in the state. The collaboration and communication by being involved in the Supported Employment Leadership Network was a strategy that contributed to success of this activity.

## **B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.**

The primary factor that impedes success in the priorities mentioned above is the rural nature of Montana. 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 are baseline data for the performance accountability indicators.

- FY 2014 data is:
- Employment rate 2<sup>nd</sup> quarter after exit: 71.0%
- Employment rate 4<sup>th</sup> quarter after exit: 66.0%
- Median Wage 2<sup>nd</sup> qtr. after exit: \$3,540
- Credential Rate 11.6%
- Measurable Skill Gains 21.2%
- Effectiveness in Serving Businesses

This information is baseline and actual performance levels will be set when further guidance is received.

In the past, each core program has collected data according to its respective needs, leading to gaps in the prior data available to inform the new performance measure targets. When possible, WIA data was used to fill in the gaps. Proposed performance measures were adjusted downwards to reflect the worker shortage in the current labor market. However, existing data does not allow calculation of measurable skill gains and credential attainment rates for each core program. While the programs will adjust to capture new data, preliminary estimates for those measures were made without support from historic data. The rates are baseline best-guess estimates and will likely change as more guidance is received.

Without any precedent for gauging the effectiveness of business services, Montana will use employment retention for the Effectiveness in Serving Businesses 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. In the upcoming low-unemployment environment 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.

- Support the Statewide Independent Living Council and the State Rehabilitation Council, which each meet four times during the year to conduct business. Expenditures included travel, stipends, supplies, meeting room rental, interpreters, and facilitation services.
- To pay some costs related to the consumer satisfaction survey.

## Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES.

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Include the following:

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

### **Section 17: Quality, Scope, and Extent of Supported Employment Services**

**Quality of Supported Employment** Vocational Rehabilitation and Blind Services (VRBS) enrolls providers who will be making supported employment time limited services available. 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 evaluated by 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 who have been selected to provide services for a limited number of consumers in a rural area where there are no established providers.

As mentioned previously, VRBS and the Developmental Disabilities have collaborated to develop training for CRP vocational services staff. The training will be required. It is felt this will significantly improve the quality of CRP 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:

- Vocational Evaluation
- Community Based Assessment
- Supported Employment
- Job Readiness Service
- Job Placement Services

Also, services such as transportation to work place, work clothing, etc. are provided when necessary.

Extended support services are available through a variety of programs following closure of the VR case. These services are described previously in this document.

VRBS will be reviewing the opportunity to provide extended services for youth as allowed under WIOA. Guidelines for this service are likely to be developed in the next year.

**Extent of Supported Employment:**

An individual shall be eligible to receive supported employment services using Title VI Part B funds if:

- The individual is eligible for vocational rehabilitation services.
- The individual is determined to be an individual with the most significant disabilities; and
- There is comprehensive assessment of rehabilitation needs of the individual including an assessment of rehabilitation career and job needs, and identifies supported employment as the appropriate rehabilitation objective for the individual.

**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). 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

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Name of designated State agency or designated State unit, as

appropriate: **Vocational Rehabilitation and Blind Services Bureau**

Name of designated State agency: **Montana Department of Public  
Health and Human Services**

Full Name of Authorized Representative:

**Nicholas Domitrovich**

Title of Authorized Representative:

**Acting 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 1 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA\*, and its supplement under title VI of the Rehabilitation Act. \*\* Yes
2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the **designated State agency listed above** agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes
3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan\*, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan; \*\* Yes
4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; Yes
5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes
6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes



7. The **Authorized Representative listed above** has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;    Yes

8. The **Authorized Representative listed above** has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes

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

## FOOTNOTES

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### Certification 1 Footnotes

\* Public Law 113-128.

\*\* Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

### Certification 2 Footnotes

\* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

\*\* No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

\*\*\* Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

### Certification 3 Footnotes

\* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

\*\* Applicable regulations, in part, include the citations in \*\*\* under Certification 2 footnotes

## ADDITIONAL COMMENTS ON THE CERTIFICATIONS FROM THE STATE

## CERTIFICATION REGARDING LOBBYING — VOCATIONAL REHABILITATION

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

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

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

(3) The undersigned shall require that the language of this certification be included in the award documents for all 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.

## STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

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

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

Applicant's Organization     **Disability Employment and Transitions Division**

Full Name of Authorized Representative:     **Nicholas Domitrovich**

Title of Authorized Representative:     **Acting 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

## CERTIFICATION REGARDING LOBBYING — SUPPORTED EMPLOYMENT

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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 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.

## STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

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

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

Applicant's Organization     **Disability Employment and Transitions Division**

Full Name of Authorized Representative:     **Nicholas Domitrovich**

Title of Authorized Representative:     **Acting 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>).

## ASSURANCES

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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:**

### 1. PUBLIC COMMENT ON POLICIES AND PROCEDURES:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a) (16) (A) of the Rehabilitation Act.

### 2. SUBMISSION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

### 3. ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN:

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

A. THE ESTABLISHMENT OF THE DESIGNATED STATE AGENCY AND DESIGNATED STATE UNIT, AS REQUIRED BY SECTION 101(A)(2) OF THE REHABILITATION ACT.

B. THE ESTABLISHMENT OF EITHER A STATE INDEPENDENT COMMISSION OR STATE REHABILITATION COUNCIL, AS REQUIRED BY SECTION 101(A) (21) OF THE REHABILITATION ACT.

The designated State agency or designated State unit, as applicable **(B) has established a State Rehabilitation Council**

C. CONSULTATIONS REGARDING THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE WITH SECTION 101(A) (16) (B) OF THE REHABILITATION ACT .

D. THE FINANCIAL PARTICIPATION BY THE STATE, OR IF THE STATE SO ELECTS, BY THE STATE AND LOCAL AGENCIES, TO PROVIDE THE AMOUNT OF THE NON-FEDERAL SHARE OF THE COST OF CARRYING OUT THE VR PROGRAM IN ACCORDANCE WITH SECTION 101(A)(3).

E. THE LOCAL ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, IN ACCORDANCE WITH SECTION 101(A)(2)(A) OF THE REHABILITATION ACT.

The designated State agency allows for the local administration of VR funds **No**

F. THE SHARED FUNDING AND ADMINISTRATION OF JOINT PROGRAMS, IN ACCORDANCE WITH SECTION 101(A)(2)(A)(II) OF THE REHABILITATION ACT.

The designated State agency allows for the shared funding and administration of joint programs: **No**

G. STATEWIDENESS AND WAIVERS OF STATEWIDENESS REQUIREMENTS, AS SET FORTH IN SECTION 101(A)(4) OF THE REHABILITATION ACT.

Is the designated State agency requesting or maintaining a waiver of state wideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. **No**

H. THE DESCRIPTIONS FOR COOPERATION, COLLABORATION, AND COORDINATION, AS REQUIRED BY SECTIONS 101(A) (11) AND (24) (B); AND 606(B) OF THE REHABILITATION ACT.

I. ALL REQUIRED METHODS OF ADMINISTRATION, AS REQUIRED BY SECTION 101(A)(6) OF THE REHABILITATION ACT.

J. THE REQUIREMENTS FOR THE COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT, AS SET FORTH IN SECTION 101(A)(7) OF THE REHABILITATION ACT.

K. THE COMPILATION AND SUBMISSION TO THE COMMISSIONER OF STATEWIDE ASSESSMENTS, ESTIMATES, STATE GOALS AND PRIORITIES , STRATEGIES, AND PROGRESS REPORTS, AS APPROPRIATE, AND AS REQUIRED BY SECTIONS 101(A) (15), 105(C)(2), AND 606(B)(8) OF THE REHABILITATION ACT.

L. THE RESERVATION AND USE OF A PORTION OF THE FUNDS ALLOTTED TO THE STATE UNDER SECTION 110 OF THE REHABILITATION ACT FOR THE DEVELOPMENT AND IMPLEMENTATION OF INNOVATIVE



APPROACHES TO EXPAND AND IMPROVE THE PROVISION OF VR SERVICES TO INDIVIDUALS WITH DISABILITIES, PARTICULARLY INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES.

M. THE SUBMISSION OF REPORTS AS REQUIRED BY SECTION 101(A) (10) OF THE REHABILITATION ACT.

4. ADMINISTRATION OF THE PROVISION OF VR SERVICES :

The designated State agency, or designated State unit, as appropriate, assures that it will:

A. COMPLY WITH ALL REQUIREMENTS REGARDING INFORMATION AND REFERRAL SERVICES IN ACCORDANCE WITH SECTIONS 101(A)(5)(D) AND (20) OF THE REHABILITATION ACT.

B. IMPOSE NO DURATION OF RESIDENCE REQUIREMENT AS PART OF DETERMINING AN INDIVIDUAL'S ELIGIBILITY FOR VR SERVICES OR THAT EXCLUDES FROM SERVICES UNDER THE PLAN ANY INDIVIDUAL WHO IS PRESENT IN THE STATE IN ACCORDANCE WITH SECTION 101(A) (12) OF THE REHABILITATION ACT.

C. PROVIDE THE FULL RANGE OF SERVICES LISTED IN SECTION 103(A) OF THE REHABILITATION ACT AS APPROPRIATE, TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR SERVICES IN ACCORDANCE WITH SECTION 101(A)(5) OF THE REHABILITATION ACT?

Agency will provide the full range of services described above **No**

D. DETERMINE WHETHER COMPARABLE SERVICES AND BENEFITS ARE AVAILABLE TO THE INDIVIDUAL IN ACCORDANCE WITH SECTION 101(A)(8) OF THE REHABILITATION ACT.

E. COMPLY WITH THE REQUIREMENTS FOR THE DEVELOPMENT OF AN INDIVIDUALIZED PLAN FOR EMPLOYMENT IN ACCORDANCE WITH SECTION 102(B) OF THE REHABILITATION ACT.

F. COMPLY WITH REQUIREMENTS REGARDING THE PROVISIONS OF INFORMED CHOICE FOR ALL APPLICANTS AND ELIGIBLE INDIVIDUALS IN ACCORDANCE WITH SECTION 102(D) OF THE REHABILITATION ACT.

G. PROVIDE VOCATIONAL REHABILITATION SERVICES TO AMERICAN INDIANS WHO ARE INDIVIDUALS WITH DISABILITIES RESIDING IN THE STATE, IN ACCORDANCE WITH SECTION 101(A) (13) OF THE REHABILITATION ACT.

H. COMPLY WITH THE REQUIREMENTS FOR THE CONDUCT OF SEMIANNUAL OR ANNUAL REVIEWS, AS APPROPRIATE, FOR INDIVIDUALS EMPLOYED EITHER IN AN EXTENDED EMPLOYMENT SETTING IN A COMMUNITY REHABILITATION PROGRAM OR ANY OTHER EMPLOYMENT

UNDER SECTION 14(C) OF THE FAIR LABOR STANDARDS ACT OF 1938, AS  
REQUIRED BY SECTION 101(A) (14) OF THE REHABILITATION ACT.

I. MEET THE REQUIREMENTS IN SECTIONS 101(A) (17) AND 103(B)(2) OF  
THE REHABILITATION ACT IF THE STATE ELECTS TO CONSTRUCT, UNDER  
SPECIAL CIRCUMSTANCES, FACILITIES FOR COMMUNITY  
REHABILITATION

PROGRAMS

J. WITH RESPECT TO STUDENTS WITH DISABILITIES, THE STATE,

CLXX. HAS DEVELOPED AND WILL IMPLEMENT,

A. STRATEGIES TO ADDRESS THE NEEDS IDENTIFIED IN THE  
ASSESSMENTS; AND

B. STRATEGIES TO ACHIEVE THE GOALS AND PRIORITIES  
IDENTIFIED BY THE STATE, TO IMPROVE AND  
EXPAND

VOCATIONAL REHABILITATION SERVICES FOR STUDENTS  
WITH DISABILITIES ON A STATEWIDE BASIS; AND

CLXXI. HAS DEVELOPED AND WILL IMPLEMENT STRATEGIES TO  
PROVIDE PRE-EMPLOYMENT TRANSITION SERVICES (SECTIONS  
101(A) (15)

AND 101(A) (25)).

5. PROGRAM ADMINISTRATION FOR THE SUPPORTED EMPLOYMENT  
TITLE VI SUPPLEMENT:

A. THE DESIGNATED STATE UNIT ASSURES THAT IT WILL INCLUDE IN THE  
VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN ALL  
INFORMATION REQUIRED BY SECTION 606 OF THE REHABILITATION ACT.

B. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL SUBMIT  
REPORTS IN SUCH FORM AND IN ACCORDANCE WITH SUCH  
PROCEDURES AS THE COMMISSIONER MAY REQUIRE AND COLLECTS  
THE INFORMATION REQUIRED BY SECTION 101(A) (10) OF THE  
REHABILITATION ACT SEPARATELY FOR INDIVIDUALS RECEIVING  
SUPPORTED EMPLOYMENT SERVICES UNDER TITLE I AND INDIVIDUALS  
RECEIVING SUPPORTED EMPLOYMENT SERVICES UNDER TITLE VI OF  
THE REHABILITATION ACT.

C. THE DESIGNATED STATE UNIT WILL COORDINATE ACTIVITIES WITH  
ANY OTHER STATE AGENCY THAT IS FUNCTIONING AS AN  
EMPLOYMENT

NETWORK UNDER THE TICKET TO WORK AND SELF-SUFFICIENCY  
PROGRAM UNDER SECTION 1148 OF THE SOCIAL SECURITY ACT.

6. FINANCIAL ADMINISTRATION OF THE SUPPORTED EMPLOYMENT  
PROGRAM:

A. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL EXPEND NO  
MORE THAN 2.5 PERCENT OF THE STATE'S ALLOTMENT UNDER TITLE VI  
FOR ADMINISTRATIVE COSTS OF CARRYING OUT THIS PROGRAM; AND,  
THE DESIGNATED STATE AGENCY OR AGENCIES WILL PROVIDE ,

DIRECTLY OR INDIRECTLY THROUGH PUBLIC OR PRIVATE ENTITIES, NON-FEDERAL CONTRIBUTIONS IN AN AMOUNT THAT IS NOT LESS THAN 10 PERCENT OF THE COSTS OF CARRYING OUT SUPPORTED EMPLOYMENT SERVICES PROVIDED TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES WITH THE FUNDS RESERVED FOR SUCH PURPOSE UNDER SECTION 603(D) OF THE REHABILITATION ACT, IN ACCORDANCE WITH SECTION 606(B)(7)(G) AND (H) OF THE REHABILITATION ACT.

B. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL USE FUNDS MADE AVAILABLE UNDER TITLE VI OF THE REHABILITATION ACT ONLY TO

PROVIDE SUPPORTED EMPLOYMENT SERVICES TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, WHO ARE ELIGIBLE TO RECEIVE SUCH SERVICES; AND, THAT SUCH FUNDS ARE USED ONLY TO SUPPLEMENT AND NOT SUPPLANT THE FUNDS PROVIDED UNDER TITLE I OF THE REHABILITATION ACT, WHEN PROVIDING SUPPORTED EMPLOYMENT SERVICES SPECIFIED IN THE INDIVIDUALIZED PLAN FOR EMPLOYMENT, IN ACCORDANCE WITH SECTION 606(B)(7)(A) AND (D), OF THE REHABILITATION ACT.

#### 7. PROVISION OF SUPPORTED EMPLOYMENT SERVICES:

A. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL PROVIDE SUPPORTED EMPLOYMENT SERVICES AS DEFINED IN SECTION 7(39) OF

THE REHABILITATION ACT.

B. THE DESIGNATED STATE AGENCY ASSURES THAT:

CLXXII. 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

CLXXIII. AN INDIVIDUALIZED PLAN FOR EMPLOYMENT THAT MEETS THE REQUIREMENTS OF SECTION 102(B) OF THE REHABILITATION ACT, WHICH IS DEVELOPED AND UPDATED WITH TITLE I FUNDS, IN ACCORDANCE WITH SECTIONS 102(B)(3)(F) AND 606(B)(6)(C) AND (E) OF THE REHABILITATION ACT.

ADDITIONAL COMMENTS ON THE ASSURANCES FROM THE STATE

## VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

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States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and the Vocational Rehabilitation Program—and submit relevant information for any of the eleven partner programs it includes in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. \* If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II and III of that document, where specified, as well as the program-specific requirements for that program (available on [www.regulations.gov](http://www.regulations.gov) for public comment). The requirements that a State must address for any of the partner programs it includes in its Combined State Plan are provided in this separate supplemental document. The Departments are not seeking comments on these program-specific requirements, which exist under separate OMB control numbers and do not represent requirements under WIOA. For further details on this overall collection, access the Federal eRulemaking Portal at <http://www.regulations.gov> by selecting Docket ID number ETA-2015-0006.

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

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## TRADE ADJUSTMENT ASSISTANCE (TAA)

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There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Has the state incorporated TAA into the sections indicated above?    Yes

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## SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)

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At minimum, in the SCSEP stand-alone submission and the SCSEP portion of the Combined State Plan, States should comprehensively cover the following elements.

## (A) ECONOMIC PROJECTIONS AND IMPACT

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States must:

1. DISCUSS LONG-TERM PROJECTIONS FOR JOBS IN INDUSTRIES AND OCCUPATIONS IN THE STATE THAT MAY PROVIDE EMPLOYMENT OPPORTUNITIES FOR OLDER WORKERS. (20 CFR 641.302(D)) (MAY ALTERNATIVELY BE DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN.)

According to the Research and Analysis Bureau in the Department of Labor and Industry the State of Montana WIOA Combined Plan Montana is expected to add roughly 7,800 jobs per year in 2015 and 2016 at a rate of 1.6%, then slow to job growth of 5,950 jobs per year from 2017 to 2024. The faster growth in the near term is expected as a continuation of the strong job growth Montana has experienced in recent years, with the worker shortage slowing growth in the long-term to only 1.1%. Although slower than recent years, the 1.1% pace in the long term is just slightly above the long-term employment growth average of 1% annually since 1980. The health care industry is expected to have the highest job demands, requiring 1,300 jobs per year through 2024. Mining, professional and technical services, and construction are expected to grow the fastest in percentage terms. Professional and technical services is expected to be Montana's fastest growing industry in percentage terms, adding an average of 600 jobs per year for the next ten years. The growth of Montana's professional and technical service industry represents the emergence of a knowledge-based service sector, which generally provides higher wage, professional jobs with good benefits. New business startups occur in every industry in Montana, with business activities and construction having the largest number of business startups among industries. Figure 8 New Business Startups in Industry is from Section II. A. Economic, Workforce and Workforce Development Activities Analysis of the Combined State Plan and illustrates the business startups by industry, showing both in the average number of new businesses per year from 2006 to 2013 and the startup rate as a percentage of existing businesses. Even though construction has an average of 611 startups per year, there are many construction firms, placing this industry in the middle for startups as calculated as a percent of existing businesses. The highest startup rates are found in the business activities, transportation, and mining sectors.

2. DISCUSS HOW THE LONG-TERM JOB PROJECTIONS DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN RELATE TO THE TYPES OF UNSUBSIDIZED JOBS FOR WHICH SCSEP PARTICIPANTS WILL BE TRAINED AND THE TYPES OF SKILL TRAINING TO BE PROVIDED. (20 CFR 641.302(D))

Montana's SCSEP sub-recipient will continue to coordinate with one-stops and community sources as well as stepping up the communication and coordination with businesses to identify training opportunities and subsequent unsubsidized employment based on the economic analysis by Research and Analysis. While Montana is challenged with an aging workforce and the lack of young people to replace retiring workers, some of those in the aging workforce are finding that they need to work to supplement their social security or their retirement. Priority will be to identify opportunities in the emerging businesses linked to

health care and support services and to place program clients into long-term, economically stable employment on a regular basis.

**3.DISCUSS CURRENT AND PROJECTED EMPLOYMENT OPPORTUNITIES IN THE STATE (SUCH AS BY PROVIDING INFORMATION AVAILABLE UNDER §15 OF THE WAGNER-PEYSER ACT (29 U.S.C. 491-2) BY OCCUPATION), AND THE TYPES OF SKILLS POSSESSED BY ELIGIBLE INDIVIDUALS. (20 CFR 641.325(C))**

Montana's economy outperformed the nation again in 2014, with rapid wage increases, strong employment growth, and declining unemployment. Wage and employment growth has occurred throughout Montana, with the western half of Montana strengthening growth to rebalance the economy geographically. The decline in oil prices has impacted our state, slowing growth in the Eastern region of Montana, but the economy is resilient and diversified enough to withstand these changes. Data from the first half of 2015 suggests Montana's economy has already overcome the challenges of low commodity prices, and is finding opportunity in other industries and areas. The Montana DLI continues to take the lead in addressing the worker shortage and other issues faced by the Montana economy. The department will continue to partner with businesses to address worker shortages, developing apprenticeships and other programs to ensure workers are quickly trained with the right skills for today's economy. Workers will need to take advantage of these training programs to continuously upgrade skills. Generally, SCSEP clients 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 clients obtain the skills needed for these jobs. SCSEP clients also register at Job Service Workforce Centers where they can benefit from Wagner-Peyser job search and placement programs.



## (B) SERVICE DELIVERY AND COORDINATION

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States must:

### 1. PROVIDE 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) ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH WIOA TITLE I PROGRAMS, INCLUDING PLANS FOR USING THE WIOA ONE-STOP DELIVERY SYSTEM AND ITS PARTNERS TO SERVE INDIVIDUALS AGED 55 AND OLDER. (20 CFR 641.302(G), 641.325 (E))

The SCSEP Plan guides the strategies that for helping older workers obtain meaningful community service assignments and training leading to unsubsidized employment. SCSEP subrecipient (Experience Works) staff works to achieve integration of SCSEP with WIOA Title I adult and dislocated worker programs, Wagner–Peyser programs, local businesses, Montana Chamber of Commerce, and other partners to ensure that training and employment strategies are based on local market conditions. Experience Works staff works to achieve equitable distribution requirements; promote the benefits of hiring older workers; improve the availability of employment and training options; and increase placement and retention of older workers. Experience Works currently maintains a colocated office location within the Helena Workforce Center and Employment Training Coordinators (ETCs) provide SCSEP services via regularly scheduled hours at Montana Job Service Workforce Centers. Experience Works maintains Memorandums of Understanding (MOU's) include WIA Title I service providers in Billings, Lewistown, Havre, Great Falls, and the Rocky Mountain Front. As a required partner of the one–stop system SCSEP coordinates with the one–stop centers and programs under WIOA in their areas and works closely with their one–stop partners to ensure older individuals are receiving services. One–stop centers provide a great opportunity for older individuals to explore the many options available to them including career services, referral to employment opportunities or other services such as training services offered through WIOA Title I programs and help prepare them for employment. Clients are required to register at the one–stops and co– enrollment of SCSEP clients in WIOA Title I programs is encouraged when appropriate. Clients are encouraged to take advantage of job search and resume writing workshops and other courses held at Job Service Workforce Centers. Staff in the workforce centers can offer their expertise in assisting seniors search for job openings where the job requirements are consistent with their knowledge and skills; and by providing referrals to employment opportunities. Partners are asked to assist with outreach and recruitment efforts to targeted and hard to serve populations. SCSEP subrecipient staff and client openings are advertised with the Montana Job Service Workforce centers. The centers also provide referrals to public assistance programs, vocational rehabilitation, and veterans' programs. Job Service Workforce Centers also serve as host agencies for training SCSEP clients.

**(B) ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH THE ACTIVITIES TO BE CARRIED OUT IN THE STATE UNDER THE OTHER TITLES OF THE OAA. (20 CFR 641.302(H))**

Montana's SCSEP grantees will continue partnerships with programs under OAA and USDOL to help older workers including: AARP–pedometer program AARP–grandparents raising grandchildren, particularly helps American Indians Information, Assistance and Referral Program links Montana seniors, their family members, caregivers, and local professionals Adult Protective Services Transportation Advisory Councils–Ticket to Work Office on Aging provides meals on wheels, health services, transportation, information referral and assistance services Community Services – sharing job site information Area Agencies on Aging–job site information Department of Labor – program guidance, help with performance measurements Job Service Workforce Centers pre–testing and registration for Wagner–Peyser services Possible job opportunities at Area Agencies on Aging, Walgreens, and U.W. Census State Workforce Investment Board MT Association of County Commissioners Montana Commissioner of Labor AFL/CIO HRDC Directors Rocky Mountain Development Council Job Service Workforce Centers Public and Private nonprofit agencies providing employment services (Helena Industries and WESTAFF) Communities – independent living centers plus state (SLIC), host agencies Senior Centers AARP Community Services Bureau, SLTC Working for Equality and Economic Liberation (WEEL) Veterans Services Department of Corrections – prerelease centers Vocational Rehabilitation Services for the Blind American Indian Tribes Planned activities to coordinate with OAA: Health fairs and senior wellness activities throughout the state Continued partnerships with Aging Services Attend and/or participate in Governor's forum on aging Attend conferences and seminars that pertain to aging services Connect homeless with services available.

**(C) 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))**

Aging often decreases people's ability to remain independent. Montana's SCSEP subrecipient works with host agencies and businesses to develop reasonable accommodations that will allow those with disabilities to work and be successful in the SCSEP training assignment or in an unsubsidized job following training. The SCSEP provider will continue to work with the Aging/Disability Resource Centers. Front–line staff is provided training to sensitize them to the needs of those with disabilities. Recruitment methods are carefully worded so as not to discourage the older person with a disability from making application for SCSEP services. There have been many years of coordination between the Rehabilitation Services, State Services for the Blind, and Veterans services for referrals and providing of services to help the older Montanans succeed in the job market. The staff will also provide technical assistance to businesses on ADA (Americans with Disabilities Act) requirements and available tax credits for hiring older workers. SCSEP clients have access to Disability Resource Coordinators that are in each Job Service Workforce Center to help them navigate the system. The Ticket–to–Work program will also be used as appropriate. Medicaid waivers are another venue for the SCSEP clients. The waivers allow people to remain in their homes rather than live in an institution. Various services from respite to transportation and personal care are offered. The

care giver can be paid if the care giver is not the legal guardian of the recipient. This could be especially beneficial on the Indian reservations.

The SCSEP sub-recipient also coordinates with Lutheran Social Services (LSS) to help serve the senior immigrant/refugee populations in Billings, Bozeman, Kalispell, Missoula, and Great Falls.

#### **(D) 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 but is certainly open to collaborating and participating in planning efforts for grant applications and regional initiatives should those opportunities arise.

#### **(E) ACTIONS THE STATE WILL TAKE 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)**

The SCSEP grantee (State and National), in the interest of creating an atmosphere of cooperation and collaboration among WIOA partners is working with the SWIB to establish the WIOA MOU. Community Management Teams (CMTs) play a vital role in ensuring that SCSEP is connected to the broader Montana workforce system. Experience Works actively participates in CMTs to improve coordination of services among the various organizations engaged in older worker initiatives that result in employment for older workers. Plays a lead role in Montana's workforce system and in the development and implementation of Montana's strategies to address the issues of older workers. The Experience Works' participation in CMTs ensures that SCSEP activities are aligned with Montana's workforce system priorities for older workers. Experience Works, uses the one-stop centers and other public entities (e.g. public libraries) for office space, referrals, training, and computer access wherever possible. Both the national and state SCSEP programs have the resources available to them and can provide timely access and information regarding employment and training resources designed specifically for seniors. Employment and Training Coordinators share information and ideas with public and private social service providers to increase the seamless integration of older workers into Montana workforce investment system and workforce.

Experience Works (national office) determined that local staff are more mobile and can conserve funding by mainly working from home-based offices in a leaner and stronger environment. Staff are more visible and accessible with strong community presence by using local partner facilities as access points to meet with applicants, distribute information, and provide mobile computer training. Local partner facilities are located throughout the state and include Billings, Helena, Kalispell, Great Falls, Missoula, Hamilton, Libby, Lewistown, Butte, Livingston, Dillon, Anaconda, Glasgow, Cut Bank, Shelby and Wolf Point.

#### **(F) EFFORTS THE STATE WILL MAKE TO WORK WITH LOCAL ECONOMIC DEVELOPMENT OFFICES IN RURAL LOCATIONS.**

Experience Works collaborates with economic development offices including Big Sky Development in Billings, Ravalli County Economic Development Authority and the Great Falls Development Authority. Experience Works is actively pursuing partnerships in other economic development offices across the state to promote the benefits of hiring older workers and to learn about upcoming opportunities for SCSEP clients. Community service includes worksites in economic development. Economic development is part of the one-stop system and are often members of the Community Management Teams in several areas across the state including the more rural locations in Montana. SCSEP staff are also part of

the Community Management Teams in this area which presents them the opportunity to provide information to and recruit community service worksites through local economic development.

**2. DESCRIBE THE 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)) (ALTERNATELY, THE STATE MAY DISCUSS THIS IN THE STATE STRATEGIES SECTION OF STRATEGIC PLAN IF SUBMITTING A COMBINED PLAN.)**

Montana's Job Service Workforce Centers have a close connection to businesses which is beneficial for SCSEP when recruiting businesses. Business recruitment is a priority the same as training site recruitment and client recruitment. Recruitment efforts include educating businesses about the value in hiring older workers and the cost benefits to the employer's business/organizations. Businesses are encouraged to take part in a multitude of activities to assist older workers in their job search such as serving as trainers at job clubs and explaining the expectations and skills needed to work for their business or organization. Building trust between the businesses and SCSEP will result in benefits for both organizations but particularly for the older workers. In addition to networking with the one-stop centers and membership on Community Management Teams, Experience Works Coordinators are involved with local Chambers of Commerce to reach out to the business community. Building relationships through networking leads to jobs for clients.

**3. DESCRIBE THE LONG-TERM STRATEGY FOR SERVING MINORITIES UNDER SCSEP. (20 CFR 641.302 (C))**

Montana SCSEP continues to focus on increasing American Indian enrollments and placements. Experience Works, will continue its efforts to recruit clients from the minority groups by: Identifying and working closely with community agencies, minority churches and organizations that serve multi-cultural populations Assigning clients to host training sites which serve to communicate with the minority population Inviting guest speakers from the minority community to participate in SCSEP workshops Asking clients, including minority individuals to make program referrals for family, friends and other contacts Advertising in local newspapers (including tribal newspapers whenever possible) and senior publications and classified ads Placing brochures and posters in One- Stop Centers, Post Offices, libraries, senior centers, social service agencies and other public places which older minority individuals frequent

**4. LIST NEEDED COMMUNITY SERVICES AND THE EXACT PLACES WHERE THESE SERVICES ARE MOST NEEDED. SPECIFICALLY, THE PLAN MUST ADDRESS THE NEEDS AND LOCATION(S) OF THOSE INDIVIDUALS MOST IN NEED OF COMMUNITY SERVICES AND THE GROUPS WORKING TO MEET THEIR NEEDS. (20 CFR 641.330)**

Whenever demographic and economic data are made available SCSEP works with other Montana agencies to ensure they are serving those populations most in need. There are 198 authorized national positions and 51 authorized state positions in Montana for PY'17. Between national and state SCSEP grantees all but seven counties are served through SCSEP. The Montana localities/populations where SCSEP services are most needed are those that are often the hardest to serve: remote, rural, counties which have limited commerce, and, thus, limited prospects for employment. These counties make up most of the state, and the current variance situation for national and state grantees reflects this fact. Collecting, monitoring and analyzing community service needs is an ongoing process.

SCSEP's service to a community is based primarily on the social and economic needs of the clients entering the program; and on the demand of the services within local communities. Seniors with limited fixed income in good health and a willingness to work could benefit from doing community service, according to those who work with SCSEP. Specific senior populations that would 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. Local community service needs include: mentoring in schools, working in prisons, jobs in tourist areas, cleaning road ditches, providing office support services, making signs, serving as job developers, doing flower enhancements along streets or in parks, serving as advisors to local businesses, cleaning rest areas, providing after-school programs for children and providing day care, receptionist for nonprofits, gift-shop attendants, service attendants for food pantries, jobs at clothing give-away programs and doing yard work. Community service requests also includes: clerks, janitors, cooks or teacher's aides in schools; clerical help (with some computer knowledge) for city, county, state and federal public agencies; cooks for nutrition sites; clerical assistants for small nonprofits (again with some computer skill); librarians in schools and towns; docents, historical researchers (again with some computer knowledge); custodians for museums in smaller communities; and maintenance workers for cities and towns and park and recreation areas. The delivery of community services in rural locations is more difficult due to the low population density and large distances between clients in each county. The more remote or economically depressed the county, the more barriers exist. Additionally, rural areas often have limited opportunities for community service assignments, training, and jobs. SCSEP will continue to work with the Office of Senior Long-Term Care/Aging Services, Montana's Workforce system, groups that provide services to people with disabilities and veterans, and other interested agencies as well as the business community to identify local community service project needs and the specific populations that will work on these projects. Local community needs will be addressed in an ongoing manner. Utilization of a marketing and recruitment strategy is organized early in each grant year to identify potential host agencies to meet the training needs that match job openings in the communities and match with client's needs and interests in training to gain employment.

**5. DESCRIBE THE 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))**

The overall goal of SCSEP in Montana is to serve the eligible clientele by providing training opportunities that both improve or build skill levels and provide the training needed for jobs available in the community. The long-term 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 business, the older worker and the state's economy. Partnerships for integrating services are a key to these strategies. Attainment of negotiated goals for serving Montana's older worker population, increasing services within the network of nonprofits and public agencies within communities, and providing skilled workers for businesses is a measure of successful service from the older worker program. Recommendations include the following: Help SCSEP clients attain the skills (such as computer and healthcare-related skills) to better fill the employment needs in the state Work with and expand on the nonprofit agencies



to provide meaningful community service assignments that fill a current need within the community; Work with businesses and nonprofit agencies to develop good training assignments where today's skills are learned on-the-job and unsubsidized employment will be the end result in more situations; Assist the business community in finding ways to attract and employ the older worker; Show businesses why this is beneficial to hire the older worker; Continue to be an active partner in Montana's one-stop systems; House SCSEP field personnel within the Montana One Stop Centers, wherever possible, throughout the state; Coordinate activities with WIOA programs and Montana One Stop Centers; Target services to American Indians; Work more closely the WIOA 166 grantees such as the Blackfeet Manpower in Browning; Expand Area Agencies on Aging referrals; Place additional emphasis on creative partnerships with groups that advocate and provide services to people with disabilities and veterans; Expand coordination with the Ageing and Disability Resource Center (ADRC) program throughout the state; Expand relationships with Montana Chambers of Commerce.

**6. DESCRIBE A STRATEGY FOR CONTINUOUS IMPROVEMENT IN THE LEVEL OF PERFORMANCE FOR SCSEP CLIENTS' 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))**

Targeting Jobs: Montana's SCSEP has been successful in placing clients in unsubsidized employment with community service agencies and especially with host agency training sites. A significant portion of SCSEP's unsubsidized placement can occur when the community service training sites hire SCSEP clients that have been training at the sites with emphasis on the value and benefits of hiring trained clients. Continued partnerships with Montana's One-Stops: Experience Works monitors information on job opening and trends, through partnerships with the one-stops, that will help identify current and future regional job opportunities; establishes and maintains with Job Service Workforce Centers, Vocational Rehabilitation Services, Social Services, Adult Services and Aging, and the Department of Education. Title V clients are assigned to these agencies as office assistants, resource room attendants, and custodial workers whenever possible. Upgrading and maintaining client skills: Client training is a key ingredient to successful program performance as often the skills of the SCSEP clients are outdated and need to be upgraded to meet today's employment requirements. Qualities valued in the older worker such as work ethic and reliability are valued by most businesses, but the need for specific skills in today's job market are crucial for success. The need for specific skills leads to training and retraining for SCSEP clients to help them become employable. In PY'14, the Montana Department of Labor and Industry, Montana's SCSEP Grantee, through coordination with the National Grantee Experience Works received Limited Competition funding to provide expanded training services to clients. Through the Limited Grant Opportunity funding, Montana provided more in-depth training to clients to increase computer literacy skills, soft skills, and occupational skills that gives them the opportunity to obtain industry recognized certifications needed for employment in today's high demand industries to market their skills effectively to businesses and be able to negotiate for better paying jobs. The additional funding also allowed Experience Works staff to set up traveling computer labs and the software needed to provide training to a total of 40 State SCSEP clients during the grant period of July 1, 2014 through June 30, 2015. The expected outcomes are increased entered employment; employment retention; and increased salaries. In addition to the training opportunities through the grant, the funds allowed for more access to supportive services by clients such as transportation so they

may participate in training and work towards successful program completion. Montana received an extension through September 30, 2015 for the Limited Competition grant and the expectation is that Montana's performance will see an increase in entered employment and retention. Ongoing Assessments of Skills: Experience Works uses an assessment tool called JobReady which includes on-line assessment and the Individual Employment Plan as well as training in a variety of skills, some at no cost to the individual and some for a fee. Completing these training courses can result in certification of skills following successful testing of the subject matter. Many clients have taken advantage of this training as it can be done at any time from any computer. Truck driver certification is made available to SCSEP clients that are willing and able to drive trucks, especially doing daily runs. There is an increased need for nursing and residential care providers, hospital workers, and ambulatory health care providers. The continued need for Certified Nurse's Aides (CNAs) is recognized by the SCSEP grantees. An assessment is made on each potential applicant for their interest and current skill level. Those that indicate an interest and limited skill level in doing the CNA work are further assessed on their physical ability to perform the job with additional training. Maintaining partnerships with the business community: There is increased effort to gather input from the business community, community leaders, and host agency supervisors on the job skill needs within their organizations and clients themselves on the types of job openings they see in their communities. This input enables SCSEP grantees and the workforce community to provide more meaningful training opportunities for the older worker and find appropriate matches for unsubsidized job placement with a higher degree of retention. Montana's SCSEP grantee monitors performance quarterly and provides technical assistance and training in areas needing improvement. DLI expects to see continuous improvement in the performance areas of entry into employment and retention due in part to SCSEP's continued use of the computer labs, software and other training resources that continues to be made available to clients after the Limited Grant Opportunity funding period was over on September 30, 2015. The benefits to clients beyond the end of the Limited Grant Opportunity funding period include an already established training plan in place along with the established computer labs, training materials and increased staff expertise.

### (C) LOCATION AND POPULATION SERVED, INCLUDING EQUITABLE DISTRIBUTION

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States must:

#### 1. DESCRIBE THE LOCALITIES AND POPULATIONS FOR WHICH PROJECTS OF THE TYPE AUTHORIZED BY TITLE V ARE MOST NEEDED. (20 CFR 641.325 (D))

Montana's SCSEP sub-recipient staff are stationed in Missoula, Billings and Great Falls. Each ETC has expertise in serving both urban and rural, to the very rural areas of the state. The coordinators are responsible for outreach and providing services to both state and national grantee clients within the counties in their area. Cascade, Flathead, Lewis and Clark, Missoula, Gallatin and Yellowstone counties are the most largely populated areas in the state. Montana also has seven reservations which presents a challenge due to their high unemployment and few opportunities for jobs. However, three of them are in or very near the most heavily populated counties which could be on the positive side for accessing jobs in those counties with larger cities. Except for Yellowstone County, the largely populated counties are in the western portion of the state. These heavily populated counties are also the most diverse in population. SCSEP Grantees work with other agencies within the state to ensure compliance in connecting localities and populations with projects authorized by Title V.

Montana's SCSEP works with other Montana agencies to ensure they are serving the most-in-need populations. The state collects, monitors and analyses community service needs on an ongoing process and has found that while it is more difficult to deliver community service needs in the more rural remote counties such as Carter, Custer, Fallon, Fergus, and Judith Basin the more populated counties including Flathead, Lewis and Clark, Gallatin and Yellowstone have the majority of harder-to-serve seniors which makes it imperative that SCSEP work closely with the partners listed below and in B.1.b. of the SCSEP State Plan. The delivery of community services in rural locations such as Carter, Custer, Fallon, Fergus, Dawson, Choteau and Judith Basic counties is more difficult due to the low population density and large distances between clients in each county. The more remote or economically depressed the county, the more barriers exist and more limited opportunities for community service assignments, training, and jobs. Montana SCSEP partners with and works closely with the Office of Senior Long Term Care/Aging Services, Veterans Services, Department of Corrections (pre-release centers) Vocational Rehabilitation and Blind Service (VRBS), American Indian Tribes, AARP, county extension offices, Good Will, Good Samaritan, St. Vincent DePaul and Salvation Army ministries, Habitat for Humanity, independent living centers, existing host agencies, senior community centers, Rocky Mountain Development Council, Job Service Workforce centers, Montana's Human Resource Development Councils (now referred to as Community Action Partnerships), and other interested agencies that work on these projects. Examples of community services needed for all of Montana include: Utility assistance; food bank; clothing assistance; and commodities; weatherization assistance; food pantry; day care; household items, Meals on Wheels or other meal assistance programs; energy assistance; economic self-sufficiency training/case management; water utility assistance; senior transportation; senior activities/exercise program; legal assistance; Literacy assistance, ESL and tutoring; Disability services including services for the blind. Community services needs have been identified in



every one of Montana's counties however due to the equitable distribution for state-funded SCSEP only ten counties may be served which are: Big Horn, Cascade, Custer, Flathead, Gallatin, Lake, Lewis and Clark, Missoula, Ravalli, and Yellowstone.

**2. LIST THE CITIES AND COUNTIES WHERE THE SCSEP PROJECT WILL TAKE PLACE. INCLUDE THE NUMBER OF SCSEP AUTHORIZED POSITIONS AND INDICATE IF AND WHERE THE POSITIONS CHANGED FROM THE PRIOR YEAR.**

Big Horn Pryor, Harden, Lodge Grass 2 Cascade Great Falls, Cascade, Belt 5 Custer Miles City, Lame Deer, Ashland 2 Flathead Kalispell, Whitefish, West Glacier, Big Horn, Coram 8 Gallatin Bozeman, Belgrade 3 Lake Polson, Elmo, Ronan, Pablo 5 Lewis & Clark Helena, East Helena, Augusta, Lincoln 6 Missoula, East Missoula, Frenchtown 11 Ravalli Hamilton, Stevensville, Corvallis, Darby, 5 Yellowstone Billings, Park City, Ballantine 9 TOTAL AUTHORIZED STATE SCSEP POSITIONS 56 There are a total of 273 authorized state and national positions in Montana for PY'15. Both State and National SCSEP authorized positions steadily decreased over the last few years however authorized positions remained the same for both programs in Program Years 2014 and 2015. Ten Montana counties have both national and state SCSEP services. Following the 2010 Census, there are five counties that are now authorized for zero positions to be served: Garfield, Golden Valley, Petroleum, Treasure and Wibaux counties. The following chart shows the State and National SCSEP grantee equitable distribution for PY'14 and PY'15.

COUNTY	STATE POSITIONS 2014	STATE POSITIONS 2015	NATIONAL POSITIONS 2014	NATIONAL POSITIONS 2015
Beaverhead	0	0	3	3
Big Horn	2	2	3	3
Blaine	0	0	3	3
Broadwater	0	0	2	2
Carbon	0	0	4	4
Carter	0	0	1	1
Cascade	5	5	15	15
Chouteau	0	0	1	1
Custer	2	2	3	3
Daniels	0	0	1	1
Dawson	0	0	2	2
Deer Lodge	0	0	3	3
Fallon	0	0	1	1
Fergus	0	0	0	0
Flathead	8	8	13	13
Gallatin	3	3	10	10
Garfield	0	0	0	0
Glacier	0	0	4	4
Golden Valley	0	0	0	0
Granite	0	0	2	2
Hill	0	0	4	4
Jefferson	0	0	3	3
Judith Basin	0	0	1	1
Lake	5	5	5	5
Lewis and Clark	6	6	8	8
Liberty	0	0	1	1
Lincoln	0	0	10	10
Madison	0	0	1	1
McCone	0	0	1	1
Meagher	0	0	0	0
Mineral	0	0	2	2
Missoula	11	11	15	15
Musselshell	0	0	1	1
Park	0	6	6	6
Petroleum County	0	0	0	0
Phillips	0	0	1	1
Pondera	0	0	2	2
Powder River	0	0	1	1
Powell	0	0	3	3
Prairie	0	0	1	1
Ravalli	5	5	11	11
Richland	0	0	3	3
Roosevelt	0	0	3	3
Rosebud	0	0	3	3
Sanders	0	0	7	7
Sheridan	0	0	2	2
Silver Bow	0	0	11	11
Stillwater	0	0	2	2
Sweet Grass	0	0	1	1
Teton	0	0	3	3
Toole	0	0	2	2
Treasure	0	0	0	0
Valley	0	0	3	3
Wheatland	0	0	2	2
Wibaux	0	0	0	0
Yellowstone	9	9	19	19
<b>TOTAL</b>	<b>56</b>	<b>56</b>	<b>217</b>	<b>217</b>

Counties with no State Authorized Positions in PY'15  
Counties with no State or National Authorized Positions for PY15

Montana's SCSEP state-funded program has 56 authorized positions (refer to chart that immediately follows this section). The number of authorized positions in each county (refer to chart that immediately follows this section for the counties, cities served and authorized positions for each county). The following chart has been updated to show the cities and counties that have state-funded-SCSEP projects any changes in authorized positions from the previous program year. (1) County Big Horn: Cities - Pryor, Harden, Lodge Grass; State Authorized Positions PY'15 2; No Change in authorized positions from PY'14. (2) County Cascade: Cities - Great Falls, Cascade, Belt; 5 State Authorized Positions PY'15; No Change in authorized positions from PY'14. (3) County Custer: Cities - Miles City, Lame Deer, Ashland; 2 State Authorized Positions PY'15; No Change in authorized positions from

PY'14; (4) County Flathead: Cities – Kalispell, Whitefish, West Glacier, Big Fork, Coram; (5) County Gallatin: Cities - Bozeman, Belgrade; 3 State Authorized Positions PY'15; No Change in authorized positions from PY'14. (6) County Lake: Cities - Polson, Elmo, Ronan, Pablo; 5 State Authorized Positions PY'15; No Change in authorized positions from PY'14. (7) County Lewis & Clark: Cities - Helena, East Helena, Augusta, Lincoln; State Authorized Positions 6 PY'15; No Change in authorized positions from PY'14. (8) County Missoula: Cities - Missoula, East Missoula, Frenchtown; 11 State Authorized Positions PY'15; No Change in authorized positions from PY'14 (9) County Ravalli; Cities - Hamilton, Stevensville, Corvallis, Darby; 5 State Authorized Positions 5 PY'15; No Change in authorized positions from PY'14. (10) County Yellowstone: Cities - Billings, Park City, Ballantine; 9 State Authorized Positions PY'15; No Change in authorized positions from PY'14.

### 3. DESCRIBE ANY CURRENT SLOT IMBALANCES AND PROPOSED STEPS TO CORRECT INEQUITIES TO ACHIEVE EQUITABLE DISTRIBUTION.

The SCSEP grantees 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. However, the population shifts in PY'12 continues to be of concern for those counties in which equitable distribution has eliminated positions.

There are currently no counties served by the State Grantee that are showing slot imbalances or 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. (1) Big Horn County; Authorized Positions 2; Enrolled Positions 2; No variances. (2) Cascade County; Authorized Positions 5; Enrolled Positions 8; variance of 3. (3) Custer County; Authorized Positions 2; Enrolled Positions 2; No variances. (4) Flathead County; Authorized Positions 8; Enrolled Positions 7; variance of -1. (5) Gallatin County; Authorized Positions 3; Enrolled Positions 3; no variances. (6) Lake County; Authorized Positions 5; Enrolled Positions 5; no variances. (7) Lewis & Clark County; Authorized Positions 6; Enrolled Positions 4; variance of -2. (8) Missoula County; Authorized Positions 11; Enrolled Positions 11; no variances. (9) Ravalli County; Authorized Positions 5; Enrolled Positions 4; variance of -1 (10) Yellowstone County; Authorized Positions 9; Enrolled Positions 7; variance of -2. The State SCSEP grantee will utilized the current tables for equitable distribution reports that are provided on the SCSEP Equitable Distribution website. The State Grantee will continue to develop strategies with the sub-grantee to address any over and/or underserve areas. Strategies will include: Increased efforts to recruit agencies in underserved counties; Continue outreach efforts to clients in underserved areas through workshops, career fairs and other opportunities to present SCSEP in underserved counties; Close enrollments timely and as appropriate in overserved areas; and Increase specialized training and job development activities intended to help clients achieve employment goals in the overserved areas. The State SCSEP grantee in coordination with its sub-grantee will continue working closely within the service communities to reduce or eliminate slot imbalances by: advertising in local community papers, provide flyers/pamphlets and other marketing tools that will aid in educating city/county government agencies; holding face-to-face presentations and discussions with non-profit and for-profit agencies/businesses and city/county officials, community clubs and organizations that focus on community improvement and employment of the older population; and continuing to open host agencies within those communities which serve the most-in-need and serve as referral sources.

4. EXPLAIN THE STATE'S LONG-TERM STRATEGY FOR ACHIEVING AN  
EQUITABLE DISTRIBUTION OF SCSEP POSITIONS WITHIN THE STATE  
THAT:

A. MOVES POSITIONS FROM OVER-SERVED TO UNDERSERVED  
LOCATIONS WITHIN THE STATE IN COMPLIANCE WITH 20 CFR 641.365.

a. Strategy that moves positions from over-served to under-served locations within the State in compliance with 20 CFR 641.365. The Montana Department of Labor and Industry (DLI) is the State SCSEP grantee. In Montana, DLI is the State Grantee and contracts with Experience Works, Inc. to provide services for the State SCSEP program. Experience Works, Inc. contracts with USDOL to provide services in the state at the National level. 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. Montana's SCSEP grantees continue to work toward the goal of having equitable distribution of the SCSEP slots within the counties so that all older individuals have access to services under the program.

B. EQUITABLY SERVES BOTH RURAL AND URBAN AREAS.

b. Equitably serves rural and urban areas. 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 clients because they provide the most opportunities for outreach to potential enrollees and businesses. 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. The national SCSEP grantee has authorized positions in fifty-one counties out of the total fifty-six counties in Montana. Ten of these counties also have state-designated positions as well. 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.

C. SERVES INDIVIDUALS AFFORDED PRIORITY FOR SERVICE UNDER 20  
CFR 641.520. (20 CFR 641.302(A), 641.365, 641.520)

c. Serves individuals afforded priority for service under 20 CFR 641.520. 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 Montana's SCSEP goal is to serve these populations at least in proportion to their percentage of the population. Program activities will be provided to ensure successful participation of these groups. Each applicant's eligibility will be determined by an interview and documented on an intake form.

## 5. PROVIDE 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. had numbers but couldn't post...

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; and 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. (1) Big Horn County; Population 13,242; 10% of Eligible Population; 2 Authorized Positions; Ratio 671:1. (2) Cascade County; Population 82,384; 45.4% of Eligible Population; 5 Authorized Positions; Ratio 7480:1. (3) Custer County; Population 11,951; 17.5% of Eligible Population; 2 Authorized Positions; Ratio 1045:1. (4) Flathead County; Population 93,068; 17.7% of Eligible Population; 8 Authorized Positions; Ratio 2059:1. (5) Gallatin County; Population 94,720; 9.5% of Eligible Population; 3 Authorized Positions; Ratio 2999:1. (6) Lake County; Population 29,017; 16.8% of Eligible Population; 5 Authorized Positions; Ratio 975:1. (7) Lewis and Clark County; Population 65,338; 13.8% of Eligible Population; 6 Authorized Positions; Ratio 1503:1. (8) Missoula County; Population 111,807; 11.4% of Eligible Population; 11 Authorized Positions; Ratio 1159:1. (9) Ravalli County; Population 40,823; 19.2% of Eligible Population; 5 Authorized Positions; Ratio 1567:1. (10) Yellowstone County; Population 154,162; 14.1% of Eligible Population; 6 Authorized Positions; Ratio 3,623:1.

## 6. PROVIDE THE RELATIVE DISTRIBUTION OF ELIGIBLE INDIVIDUALS W H O :

### A. RESIDE IN URBAN AND RURAL AREAS WITHIN THE S T A T E

The SCSEP Equitable Distribution report is the primary means for ensuring that the State distributes SCSEP so that all eligible populations and target groups are properly served. This formula dictates our 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 significant barriers most significantly in the more rural areas of the state. Challenges and barriers include: shortages of quality host agencies that can provide the training that matches the employment goals for clients; shortages of businesses 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 clients 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 equivalent to those living in urban areas. Experience Works makes every effort possible to accommodate enrollees whenever suitable arrangements can be made including

flexibility in scheduling training. Experience Works 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 clients 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 clients by December 2012 and ongoing thereafter; and Identify tools and resources to rally communities to help with the needs of the eligible population.

## B. HAVE THE GREATEST ECONOMIC NEED

There are many older persons that need to work to pay for the necessities of life: food, housing, transportation and medical care. Social Security benefits alone cannot meet their needs and they must subsidize this with employment. Many the clients are working to pay for prescriptions or to cover the cost of health insurance. Of the current enrollment approximately 61% are below the age of 65 and may not receive any Social Security benefits (unless they have opted to draw their benefit at age 62 or receive Social Security Disability benefits.) Low income older workers want and need to work. The number of older workers is growing in Montana along with the rest of the country. According to the US Census Bureau's 2006 to 2010 American Community Survey (ACS), 12.7 percent of the 2006 to 2010 population is at least 65 years old. The 2006 to 2010 ACS data also indicates that Montana has a population that includes 134,588 people that are 65 years old and older. Of this population, 11,916 (8.9%) are the men and women that have an income that is at or below the HHS poverty levels. Currently, SCSEP grantees in Montana have an enrollment of clients that include almost 90% who are living in poverty. According to the American Community Survey, an annual survey performed by the U.S. Census Bureau, 14.8% of the entire population in 2014 lived in poverty.

## C. ARE MINORITIES

In Montana American Indians are the main minority population and are served at approximately 19% of total enrollments. This minority population is showing as underserved in the SCSEP program based on the numbers of the eligible population. Montana has seven reservations with three of them located in or very near the most heavily populated counties. Montana also has one State Workforce Investment Board certified American Indian One-Stop. The SCSEP sub-recipient works closely with local agencies and representatives in areas on or near the reservations to target recruitment activities to under-served areas, the areas of higher concentrations of this minority population and to others who are most in need. The total minority population within Montana's SCSEP program is approximately 26% of the total enrollments. The following are minority statistics of clients pulled from the PY'14-year end performance report: American Indian 19% Asian/Native Hawaiian/Pacific Islander 0% Black or African American 2% Hispanic, Latino or Spanish Origin 4% Experience Works, through constant and ongoing personal and community networking, are made aware of individuals who are new to communities and may need SCSEP training opportunities. The outreach by ETCs allow them to be proactive and identify those within these minorities who may need and benefit from SCSEP services.



#### D. ARE LIMITED ENGLISH PROFICIENT.

Individuals with limited English proficiency are included in the priority of service, most-in-need group with barriers to employment. As of PY'14 final quarter report one percent of the clients served were showing as limited English proficient. Experience Works staff will use the same techniques of recruitment of eligible individuals who are limited English proficient as the other most-in-need populations including: recruitment through the one-stop systems; advertisements; and working closely with local community and business leaders who are members of local ethnic or cultural groups that include minorities or limited-English speaking individuals; and networking with organizations that share SCSEP's priority in helping those most in need. Experience Works ETCs recruit these individuals for SCSEP, develop community service assignments and help minority older individuals seek unsubsidized employment.

#### E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))

Recruitment of eligible clients in rural areas requires more innovative methods than in more urban areas due to the greater distances between clients, high transportation costs, and increased time needed to serve the clients. Experience Works, links with the mature population in rural areas through newspaper advertisement; utilizing posters in high senior traffic areas; television and radio appearances; networking with senior citizen centers, aging organizations, disabilities advocacy and service groups, veteran's organizations, religious centers, city government officials, tribal leaders, and other community-based organizations. Experience Works also works closely with Montana's Job Service Workforce Centers who helps with recruitment and solicit referrals from them. Many of the same techniques are used to recruit clients in urban areas, but with much reduced travel costs and with less time involved. Aging will often decrease people's ability to remain independent. Experience Works networks with host agencies and businesses to develop reasonable accommodations that will allow those with disabilities to work and be successful in the SCSEP training assignment or unsubsidized job following training. The PY'14 fourth quarter end report showed that 21% of enrolled clients had some form of disability. Currently anyone who is eligible and suitable for SCSEP in Montana is served and currently there is no one on a waiting list.

#### 7. DESCRIBE THE STEPS TAKEN TO AVOID DISRUPTIONS TO SERVICE FOR CLIENTS TO THE GREATEST EXTENT POSSIBLE, WHEN POSITIONS ARE REDISTRIBUTED, AS PROVIDED IN 20 CFR 641.365; WHEN NEW CENSUS OR OTHER RELIABLE DATA BECOMES AVAILABLE; OR WHEN THERE IS OVER-ENROLLMENT FOR ANY OTHER REASON. (20 CFR 641.325(I), 641.302(B))

Census data is used to determine equitable distribution. The population shifts each year causes some counties to be over-served and some to be under-served even though the authorized numbers for these counties meet the Census figures. There may need to be an adjustment in the numbers that differ from the Census 2010 figures to adequately serve these areas of the state. Montana's SCSEP will adhere to any recommendation from the U.S. Department of Labor whenever new census data indicates a shift in the location of eligible population or over-enrollment for any other reason. Current SCSEP clients in subsidized community service assignments are encouraged to move into unsubsidized employment positions and ensure compliance with the Older Americans Act time limits. Ten

Montana counties have both federal and state SCSEP services. All other counties have federal SCSEP services. The State of Montana continually works toward the goal of equitable distribution of the SCSEP slots within the counties so that all people have access to services under the program. Changes in services to counties with population changes will be handled through attrition to avoid any disruption in service. The challenges that face Montana continue to grow as the work force continues to age.

## SCSEP ASSURANCES

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The State Plan must include assurances that where SCSEP is included in the Combined Workforce Plan, the State has established a written policy and procedure to obtain advice and recommendations on the State Plan from:

Representatives of the State and area agencies on aging;    Yes

State and local boards under WIOA;    Yes

Public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the State, except as provided under section 506(a)(3) of OAA and 20 CFR 641.320(b);    Yes

Social service organizations providing services to older individuals;    Yes

Grantees under Title III of OAA;    Yes

Affected Communities;    Yes

Unemployed older individuals;    Yes

Community-based organizations serving older individuals;    Yes

Business organizations; and    Yes

Labor organizations.    Yes

## STATE COMMENTS ON SCSEP ASSURANCES



## APPENDIX 1. PERFORMANCE GOALS FOR THE CORE PROGRAMS

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Include the State's expected levels of performance relating to the performance accountability indicators based on primary indicators of performance described in section 116(b)(2)(A) of WIOA.

### **Instructions: Performance Goals for the Core Programs**

Each State submitting a Unified or Combined Plan is required to identify expected levels of performance for each of the primary indicators of performance for the 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 adjusted levels of performance for the indicators for each of the first two years of the plan.

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**TABLE 1. EMPLOYMENT (SECOND QUARTER AFTER EXIT)**

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Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	71.00	71.00	71.00	71.00
Dislocated Workers	60.00	71.20	60.00	71.20
Youth	50.00	64.90	50.00	64.90
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	71.00	70.90	71.00	70.90
Vocational Rehabilitation	71.00	71.00	71.00	71.00

User remarks on Table 1

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**TABLE 2. EMPLOYMENT (FOURTH QUARTER AFTER EXIT)**

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Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	67.00	71.00	67.00	71.00
Dislocated Workers	67.00	67.20	67.00	67.20
Youth	56.00	55.70	56.00	55.70
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	67.00	66.70	67.00	66.70
Vocational Rehabilitation	66.00	66.00	66.00	66.00

User remarks on Table 2

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**TABLE 3. MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)**

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Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	5,913.00	5,913.00	5,913.00	5,913.00
Dislocated Workers	7,192.00	7,192.00	7,192.00	7,192.00
Youth	2,727.00	Baseline	2,727.00	Baseline
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	5,384.00	5,028.00	5,384.00	5,028.00
Vocational Rehabilitation	3,540.00	3,540.00	3,540.00	3,540.00

User remarks on Table 3

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**TABLE 4. CREDENTIAL ATTAINMENT RATE**

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Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	52.00	63.00	52.00	63.00
Dislocated Workers	53.00	63.00	53.00	63.00
Youth	50.00	59.60	50.00	59.60
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	12.00	12.00	12.00	12.00

User remarks on Table 4

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**TABLE 5. MEASUREABLE SKILL GAINS**

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Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	37.00	Baseline	37.00	Baseline
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	21.00	Baseline	21.00	Baseline

User remarks on Table 5

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**TABLE 6. EFFECTIVENESS IN SERVING EMPLOYERS**

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Program	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level
Adults	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	Baseline	Baseline	Baseline	Baseline
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 6

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TABLE 7. COMBINED FEDERAL PARTNER MEASURES

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Measure	PY 2016 Proposed/ Expected Level	PY 2016 Negotiated/ Adjusted Level	PY 2017 Proposed/ Expected Level	PY 2017 Negotiated/ Adjusted Level

User remarks on Table 7



## APPENDIX 2. OTHER STATE ATTACHMENTS (OPTIONAL)

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