

MID-CYCLE UPDATES TO THE MONTANA
PYS 2024-2027 WIOA STATE PLAN

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Overview

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

OPTIONS FOR SUBMITTING A STATE PLAN

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

- the Adult program (Title I),
- the Dislocated Worker program (Title I),
- the Youth program (Title I),
- the Adult Education and Family Literacy Act program (Title II), and
- the Wagner-Peyser Act Employment Service program (authorized under the Wagner-Peyser Act, as amended by Title III),

- the Vocational Rehabilitation program (authorized under of the Rehabilitation Act of 1973, as amended by Title IV).

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

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

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

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

HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

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

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

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

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

Federal grant benefit. In addition, responses to this information collection are public, and the agencies offer no assurances of confidentiality. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Office of Workforce Investment, and reference OMB control number 1205-0522. Note: Please do not return the completed plan to this address.

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

I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

A. WIOA STATE PLAN TYPE

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

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

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

COMBINED PLAN PARTNER PROGRAM(S)

Montana is submitting a combined plan.

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

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

Yes

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

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.))

No

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

Yes

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

No

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

Yes

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

No

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

No

B. PLAN INTRODUCTION OR EXECUTIVE SUMMARY

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

On August 11, 2025, Governor Gianforte signed Executive Order No. 5-2025, establishing 406 JOBS, and setting the framework through which Montana is modernizing its workforce efforts. In turn, Montana has modified our WIOA state plan around the principals of 406 JOBS and its alignment with America’s Talent Strategy. Montana also accelerated our efforts to move to a combined WIOA and Perkins plan, submitting together during this modification for the first time, and further strengthening coordination between workforce and education systems. Together, the goals and activities outlined in this combined plan serve as the strategic framework for interagency coordination, training program delivery, and investments across the workforce system with an emphasis on industry-led workforce development.

The 406 JOBS framework is Montana’s unifying statewide approach to workforce development, which creates industry-led efforts to coordinate state agencies in partnership with industry, labor, education and training providers, and economic development entities. Grounded in a clear assessment of labor market realities, responding to persistent labor demand across industries, and recognizing significant untapped potential among Montanans who are unemployed or not in the labor force, the 406 JOBS initiative focuses on “4 pathways to work, 0 barriers to employment, and

6 high-demand sectors,” while emphasizing the need to prepare the labor market for the emergence of AI as workforce transforming technology.

The 406 JOBS executive order directs the State Workforce Innovation Board (SWIB) to lead this effort, align it with state economic priorities, and facilitate industry-led workforce strategies that reflect current and future labor market demands. 406 JOBS prioritizes upskilling workers into in-demand, higher wage occupations; supporting employers in adopting responsible automation and AI; identifying sectors where automation can help address workforce gaps; re-engaging prime-age adults who have left the labor force; promoting skills-based hiring; and equipping Montanans with AI skills. To accomplish this, the framework requires coordinated action across the public/private sectors, but also within government across numerous state agencies, including the Department of Labor and Industry, the Montana Office of Public Instruction, the Office of the Commissioner of Higher Education, the Department of Commerce, and the Department of Public Health and Human Services to streamline workforce efforts and reduce duplication of governmental service.

In response to the launch of 406 JOBS, the SWIB has released Montana’s Year One Workplan for the initiative, which introduces the initial actions Montana is taking to accomplish the goals of the executive order and to respond to the challenges of Montana’s workforce shortages and areas of non-participation in the labor force. In this workplan, 12 priority initiatives are introduced with specific tasks and measurable outcomes that align closely with America’s Talent Strategy’s five pillars. In addition, Montana WIOA partners are working to incorporate these elements across programs:

Industry Driven Strategies:

The SWIB is directed to establish local sector partnerships in high-demand sectors, creating regional, employer-led partnerships that bring together businesses, labor or employee representatives, education and training providers, and supportive-services experts to identify priority occupations, define sector strategies, and address concrete workforce gaps.

At the same time, increasing Registered Apprenticeship pathways is one of the 12 priority initiatives in the Year One Work Plan, emphasizing a training model that directly delivers employer-led training and in-demand skills. The plan calls for expanding pre-apprenticeships and youth apprenticeships, reducing structural barriers to Registered Apprenticeship and training workforce intermediaries so employers understand and can use apprenticeship as a core sector strategy.

Worker Mobility and Advancement:

406 JOBS and Montana’s workforce efforts parallel the national focus on helping workers advance into better jobs and reconnecting disconnected adults to self-sustaining careers. Initial efforts focus on improving services for veteran transitions, establishing an Office of Reentry to coordinate workforce services for individuals returning to communities after incarceration, working to reduce barriers to employment through disability empowerment, and addressing childcare shortages to enable labor force growth. Work in this area also includes establishing a Montana Credential Registry to identify in-demand, industry-recognized credentials to identify high-quality training

opportunities and encourage credential attainment in high school settings. Through these, Montana is working to advance worker mobility.

Montana's December 2025 launch of the statewide credential registry under the STARS Act directly supports worker mobility and advancement, a core pillar of America's Talent Strategy. The registry identifies industry-recognized credentials and work-based learning experiences that qualify for Future Ready payments, creating transparent pathways for workers to upskill into higher-wage occupations. By integrating the credential registry with WIOA's Eligible Training Provider List, labor market information dashboards, and career exploration tools, and aligning to the new Montana CTE Career Pathways, Montana is building a coordinated ecosystem that empowers jobseekers to make informed training decisions and supports employers in finding workers with verified, in-demand skills. These efforts advance both the Worker Mobility and Integrated Systems pillars through data-driven, user-friendly tools.

As federal policy evolves to expand Pell eligibility for high-quality, short-term workforce and career and technical education credentials, Montana will leverage these Workforce Pell opportunities to reduce cost barriers for low-income and working adults seeking rapid up-skilling in high-demand fields. Through coordinated planning across WIOA core programs, Perkins, and the Montana University System, the state will prioritize short-term trainings that are Pell-eligible, aligned with 406 JOBS sector priorities, and embedded in clear career pathways so participants can earn, learn, and advance without taking on unsustainable debt. Montana will also use shared labor market information, the statewide credential registry, and joint advising to help students and jobseekers navigate Workforce Pell options and select programs that lead to strong employment and earnings outcomes in in-demand occupations.

Integrated Systems:

Montana's Executive order 05-2025 explicitly designates 406 JOBS as "the unifying statewide framework" and requires all executive branch workforce programs to designate liaisons to SWIB, directly supporting the federal pillar of replacing fragmented, duplicative programs with a streamlined, coordinated system that delivers unified services. It further ties 406 JOBS to WIOA and Perkins planning cycles and calls for common sector priorities (the six high-demand sectors), shared tools (such as credential and program inventories), and aligned initiatives across state agencies, which directly advances the federal goal of building an integrated, user-friendly workforce system that aligns education with workforce demand.

Accountability and Results:

406 JOBS requires Montana's SWIB to produce an implementation plan with measurable outcomes and timelines, and to incorporate results into WIOA and Perkins planning and annual reporting, consistent with the national pillar emphasizing accountability, outcomes-based investment, and continuous improvement. The plan requires SWIB to produce and execute a detailed implementation plan, to track progress on metrics such as the number of local sector partnerships formed, apprenticeships and pre apprenticeships expanded, AI skills initiatives launched, and barriers reduced, and to report these outcomes publicly and through existing WIOA reporting structures.

Flexibility, Innovation, and AI Readiness:

406 JOBS focuses on responsible automation, skills-based hiring, and explicitly promoting and expanding opportunities that equip Montanans with AI skills, along with integrating AI tools to help jobseekers and supporting small businesses in AI adoption. These efforts directly advance the federal call to prioritize AI literacy, flexible and innovative training models, and rapid reskilling for an AI driven economy.

For this midcycle update, Montana is submitting a combined WIOA–Perkins plan for the remainder of the 2024-2027 planning cycle, integrating workforce development and career and technical education under a unified strategic framework.

This combined plan aligns Montana's WIOA core programs with Perkins V–funded career and technical education activities, treating workforce development, CTE, and work-based learning as interconnected components of a single talent development system rather than separate programmatic silos, advancing America's Talent Strategy's Integrated Systems pillar by replacing fragmented programs with a streamlined, coordinated system that delivers unified services.

This transition builds on Montana's ongoing efforts under the 406 JOBS framework and the statutory direction provided in House Bill 823 (2025), which formalizes SWIB's role in collaborating in planning efforts with broader workforce system strategies. In accordance with HB 823 and MCA 20-7-330, the Perkins planning process is convened under the leadership of OCHE and OPI, with collaboration from the State Workforce Innovation Board to coordinate and align efforts toward development and submission of the combined WIOA/Perkins State Plan.

Through this combined WIOA–Perkins plan, Montana is:

- Strengthening alignment between secondary and postsecondary CTE programs and WIOA employment and training services, ensuring students and jobseekers experience seamless pathways from education to careers
- Coordinating employer engagement across both systems, prioritizing industry feedback to inform program design, curriculum development, and work-based learning opportunities, directly supporting America's Talent Strategy's Industry-Driven Strategies pillar
- Expanding work-based learning opportunities, including Registered Apprenticeship, pre-apprenticeship, and early credential attainment, by coordinating efforts across agencies and programs, ensuring students are future-ready
- Continuing efforts to enhance data integration and program coordination between MTDLI, OCHE, and OPI, enabling better tracking of participant outcomes and more effective program evaluation across the education-to-workforce continuum.

The combined plan will maintain all statutory requirements of WIOA and Perkins V while presenting a coordinated state strategy organized around the six high-demand sectors identified in 406 JOBS: healthcare, construction, hospitality and recreation, advanced manufacturing and computing, education and childcare, and financial and professional services. State and local implementation will continue to reflect the distinct purposes and eligible activities of each program

while ensuring coordination points are clear, duplicative services are minimized, and employer and participant experiences are integrated and industry-driven.

Taken together, these efforts are incorporated into Montana’s combined WIOA-Perkins plan strategies, and are embedded further within specific programs, making the 406 JOBS framework the central vehicle for translating guidance into action and aligning state and federal priorities. Montana’s plan amendments for PY 2026 and 2027 focus on organizing programs and investments around industry-driven sector strategies, clear pathways for worker mobility, an integrated and accountable workforce system, improved alignment between workforce and education, and forward-looking innovation and AI readiness. Montana is building a more responsive, robust talent pipeline that reflects the state’s unique labor market realities. Through this work, Montana’s workers and industries are poised for continued prosperity, with a stronger, more adaptable workforce prepared to support economic growth and shared opportunity in the years ahead.

II. STRATEGIC ELEMENTS

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

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

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

1. ECONOMIC AND WORKFORCE ANALYSIS

A. ECONOMIC ANALYSIS

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

I. EXISTING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

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

II. EMERGING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

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

III. EMPLOYERS' EMPLOYMENT NEEDS

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

Introduction

Montana's labor market continues to be historically tight, with strong worker demand outpacing supply. Montana's statewide unemployment rate remains under 3.5% going into 2026 and these low unemployment rates persist across the state. This follows a period of rapid employment and labor force growth in the first half of the 2020s. Since 2020, total employment has grown by nearly 6%, placing Montana among the top ten states for employment growth over this period (https://lmi.mt.gov/docs/Publications/LMI-Pubs/Labor-Market-Publications/25_LaborDayReport_Final.pdf). In 2024, Montana's labor force reached a record high of roughly 581,000 workers, yet the pace of increase, about 0.8%, was slower than recent growth as domestic in-migration receded from historic highs.

As a result of constrained supply, 2024 saw just over 3,000 jobs added for roughly 0.5% employment growth. Evidence of this being an issue of supply, with Montana having over two open jobs per unemployed worker and the third highest job openings rate among states as of October 2025 (<https://lmi.mt.gov/Home/Job-Tracking>). These labor market challenges around supply are unlikely to quickly recede, as Montana faces a pronounced aging trend as large numbers of Baby Boomers continue to retire, pushing down overall labor force participation even as participation among workers under age 55 has improved. The number of retired Montanans surpassed 200,000 in 2022 and retirees account for a growing share of the state's population not in the labor force.

Looking ahead, Montana is projected to add around 6,400 jobs per year on average (https://lmi.mt.gov/docs/Publications/LMI-Pubs/Labor-Market-Publications/2023-2033ProjectionsPub_Final.pdf). With growth increasingly facing constraints related supply, Montana's 406 JOBS workforce framework is essential. A focus on reducing barriers to work and increasing labor force participation to grow supply, expanding skills-based and on-the-job training that rapidly train workers without reducing time in the workforce, and partnering with employers to align training with specific occupational demand to reduce labor market frictions will help bring more Montanans into the labor force and raise productivity.

(i) Existing Demand Industry Sectors and Occupations

Existing demand in Montana’s economy stems from Montana’s largest industry sectors, particularly those that have experienced recent, large growth. Figure 1 shows Montana’s industry composition and recent growth. Over the past four years, Leisure Activities has seen the largest increase in employment, adding 14,587 jobs, while still growing by 640 jobs in 2024 alone. This growth underscores the continued strength of tourism, hospitality, and recreation in the state’s economy, particularly following a notable shift in recreation spending in the 2020s. Business Services has also expanded rapidly, gaining 9,589 jobs over four years and 1,533 jobs in just the last year, reflecting a growing tech sector within Montana, as well as strong demand for professional, technical, and administrative support across other industries.

Industry	Employment	% of Total	Job Change (1 yr)	Job Change (4 Yr)	Average Wage
Agriculture	6,946	1%	8	738	\$53,457
Mining	6,053	1%	-724	-187	\$105,835
Construction	39,286	8%	481	6,484	\$71,226
Manufacturing	21,458	4%	-284	1,037	\$68,794
Trade	81,927	16%	374	7,688	\$50,970
Transportation and Utilities	19,409	4%	393	1,202	\$68,949
Financial Activities	24,129	5%	-319	1,659	\$83,333
Business Services	53,549	10%	1,533	9,589	\$82,461
Health Care and Educational Services	118,889	23%	1,590	7,869	\$60,540
Leisure Activities	74,149	14%	640	14,587	\$28,553
Public Administration	39,676	8%	1,104	2,027	\$68,670
Information & Other	27,299	5%	1,178	3,578	\$55,649

Source: Quarterly Census of Employment and Wages

Similarly, Healthcare and Educational Services has added 7,869 jobs over four years and posted the single largest one-year gain among industries in 2024 with 1,590 additional jobs. This reinforces the Health Care industry’s continued role as one of Montana’s largest employment industries and a major source of job growth and labor demand. Montana’s construction industry has expanded by 6,484 jobs over four years and added 481 jobs in the most recent year, consistent with ongoing demand for housing and infrastructure driven by prior in-migration and economic growth. Trade has grown by 7,688 jobs over four years, though had a smaller level of growth in 2024 with a modest 374 job increase.

Figure 2: Projected Job Openings by source, Montana, 2024-2034

Occupation	New Jobs	Exits	Transfers	Total Openings	2024 MT Annual Median Wage
Food Preparation and Serving Related Occupations	250	4,430	6,070	10,750	\$29,960
Office and Administrative Support Occupations	-70	3,190	4,030	7,150	\$44,120
Sales and Related Occupations	110	2,900	3,840	6,850	\$37,230
Transportation and Material Moving Occupations	310	2,070	3,220	5,610	\$44,880
Construction and Extraction Occupations	340	1,200	2,060	3,600	\$59,200
Healthcare Support Occupations	300	1,470	1,810	3,580	\$37,880
Management Occupations	300	1,220	2,010	3,530	\$97,550
Building and Grounds Cleaning and Maintenance Occupations	100	1,420	1,780	3,300	\$37,390
Personal Care and Service Occupations	100	990	1,690	2,770	\$32,080
Educational Instruction and Library Occupations	60	1,170	1,340	2,570	\$48,040
Business and Financial Operations Occupations	200	840	1,510	2,550	\$70,620
Installation, Maintenance, and Repair Occupations	170	910	1,330	2,420	\$55,610
Healthcare Practitioners and Technical Occupations	460	1,010	930	2,410	\$79,850
Production Occupations	100	820	1,360	2,270	\$46,910
Computer and Mathematical Occupations	30	430	720	1,180	\$79,100
Community and Social Service Occupations	100	430	600	1,130	\$47,860
Protective Service Occupations	20	420	590	1,040	\$58,560
Arts, Design, Entertainment, Sports, and Media Occupations	40	370	550	970	\$46,220
Farming, Fishing, and Forestry Occupations	30	370	540	950	\$46,060
Life, Physical, and Social Science Occupations	60	150	680	890	\$63,330
Architecture and Engineering Occupations	80	250	420	750	\$78,980
Legal Occupations	20	120	160	300	\$74,330

Source: MTDLI Occupational Employment Projections 2024-2034

Figure 2 shows projected job growth by occupation. Forecasts point to healthcare occupations contributing the largest number of new jobs to Montana’s labor market over the next decade, with a projected 760 jobs per year between healthcare practitioners and technical and healthcare support occupations. Continued growth in healthcare jobs is expected due to rising demand among an aging population in Montana, as well as in response to major investments into the industry through the Rural Health Transformation Program. Demand not only arises from growth, but from separations and turnover, as well. According to a study on Montana nurses (<https://lmi.mt.gov/docs/Publications/LMI-Pubs/Special-Reports-and-Studies/NursingReport2025-FINAL.pdf>), 23% say that they intend retire or otherwise leave the occupation within the next five years, creating additional demand for replacement workers to support the industry. Other critical healthcare occupations projected to remain in demand include home health and personal care aides (1,560 job openings per year), nursing assistants (750 job

openings per year), registered nurses (680 job openings per year), and medical assistants (410 job openings per year).

Construction and extraction occupations follow healthcare occupations with the most jobs added with an expected 340 jobs per year over the decade. Construction occupations are expected to have approximately 3,600 total job openings per year over the next decade after accounting for occupational transfers and labor market exits. Montana's shortages in housing supply and high prices in the housing market are likely to keep demand for workers high in the construction of buildings and specialty trade contracting industries. Meanwhile, heavy and civil engineering construction employment is projected to remain stable. Like the rest of Montana's workforce, an aging workforce in construction and the trades will also require training of new workers to replace experienced workers exiting to retirement, with a projected 1,200 of the total job openings coming from occupational exits. Emphasizing on-the-job training and apprenticeship programs will be key to meeting high demand in these occupations, specifically for jobs such as construction laborers, carpenters, plumbers, and electricians, among others.

Professions tied to food preparation, sales, and office and administrative support are projected to experience the greatest numbers of job openings until 2034. These occupations, where workers with disabilities are often overrepresented nationally, could present good opportunities to engage and employ disabled workers in Montana. These industries are high-employment industries that also tend to experience high levels of turnover due to typically lower than average wages. For these occupations, total number of job openings remain high despite growth close to the statewide average. Jobs in these occupation groups often attract qualified candidates through structured work-based learning opportunities. The state agency's workforce development resources are therefore channeled towards occupations that require advanced skills requiring post-secondary education and credentialing and offering higher wages.

Beyond these notable sectors, Montana's labor market will continue to face high demand for workers across a broad set of occupations due to the fast employment growth and continued retirement of the baby boomer generation. Beyond total job openings, wages also provide a signal for occupational demand due as a reflection of the intrinsic value of the position and skills the job required. Looking at projections of job growth among jobs that earn at least \$45,000 and require some post-secondary training reveals existing demand among other occupations. This includes bookkeeping, accounting, and auditing clerks (880 annual openings), heavy and tractor trailer truck drivers (800 openings), and computer user support specialists (480 annual openings, and automotive service technicians (250 annual openings). These occupations pose as strong opportunities for targeted training investments using strategies such on-the-job training, apprenticeship, and targeted attainment of credentials.

(ii) Emerging Demand Industry Sectors and Occupations

Emerging sectors in Montana include the professional and technical services sector as well as advanced manufacturing and computing. Montana's professional and technical services sector experienced remarkable growth and emerged as one of the state's most rapidly expanding industries over the last decade. Unlike other industries that experienced swings in 2020 and 2021,

the sector continued to grow through the pandemic with 7.7% growth from 2019-2021 due to the ability of professionals to work remotely. Montana's professional and technical services experienced a compounding annual growth rate of 3.4% in the decade from 2014-2024, second only to the construction industry in terms of growth rate, and is now poised to add the third most jobs through 2034 with the 3,000 total projected jobs added to the industry. With the ongoing evolution of remote work practices and technological innovations, the professional and technical services field is positioned to achieve greater significance in Montana's economic landscape over the next decade, enabling greater participation from a more diverse and distributed workforce. Within the tech sector, there is a demand for various computer occupations, including computer user support specialists, software developers, computer programmers, and network and computer systems administrators. These roles are over 100 annual job openings each, with a median wage surpassing \$50,000.

The manufacturing sector remains an area of emerging demand despite a slowdown in 2024 due to large recent growth and an evolution in composition of the industry towards advanced manufacturing. Referring back to figure 1, the manufacturing sector added over 1,000 jobs between 2021 and 2024, while recent large layoffs among wood products manufacturers dampened growth in 2024. Advanced manufacturing will continue to be a critical area of growth during a period of labor scarcity as automation techniques and new technologies keep production levels high. At a median wage of approximately \$47,000 in Montana, production occupations typically offer wages just close to the statewide median wage. With the industry expanding, recruiting workers may be challenging for businesses considering the competitiveness of wages in other sectors. However, many occupations in this sector could be targeted for training with on-the-job or rapid training efforts that equip workers without post-secondary certifications, including those with disabilities, with the required skills. Over the next decade, 2,300 job openings per year are expected in production occupations. There is significant need for supervisors of production and operating workers, welders, cutters, solderers, brazers, and miscellaneous assemblers and fabricators. These roles offer 190-220 annual job openings each, with median wages between at \$41,000-\$65,000, presenting viable opportunities for workers facing employment barriers.

Federal stimulus will also play a role in some emerging industries and occupations in Montana, particularly through the state's designation as a regional tech hub in photonics and remote sensing technologies. Awarded by the U.S. Department of Commerce, the Headwaters Tech Hub will leverage existing infrastructure and activity in this sector with over 40 photonics companies working in research and manufacturing of these devices utilized in national security, space exploration, and manufacturing among other purposes. In 2024, approximately 900 workers are employed by Montana's photonics sector and projections suggest employment levels will more than double over the next decade, growing to a range of 1,900 to 4,000 jobs by 2034. The stimulus provided to this industry through the Headwaters Tech Hub will require rapid training in new jobs in advanced manufacturing, assembly, field operations, and maintenance, creating opportunities for workers in Montana, including those with disabilities or other barriers to employment, who can benefit from the flexibility and accessibility of remote work arrangements. In addition, Montana State University (MSU) was named a Defense Innovation Unit On-Ramp Hub in 2025, creating opportunities for further research, development, and advanced manufacturing employment and

further strengthening the region as a hub for development of advanced technologies with national security and defense applications.

(iii) Employers Employment Needs

Across industry sectors and occupations, certain skills emerge as crucial contributors to workforce success. Active listening, critical thinking, effective communication, monitoring abilities, social perceptiveness, reading comprehension, and adept time management are identified as important for over 90% of the state's anticipated employment (MT 2023-2032 Projections, ONET Skills Analysis). Noteworthy technical skills include operations monitoring, quality control analysis, and troubleshooting proficiency. Feedback solicited as a part of stakeholder engagement efforts suggested that providers are noticing similar skill needs in existing clients. WIOA program providers indicated that critical thinking and active listening skills were in high demand, along with interpersonal skills. Clear communication is the most frequent skill that employers note as needing improvement. Clients served in the current tight labor market have higher barriers and skill development needs than clients in previous years when unemployment rates were higher. Addressing multiple employment barriers requires significant effort to navigate through different partners. Business outreach and engagement efforts solicited feedback from employers about worker needs. Many employers complained about worker behavior associated with tight labor markets, including frequent job hopping, a lack of qualified applicants, and the need to hire workers that require more job-readiness skills. Some employers are reluctant to train a workforce when turnover is high but agreed that state and federal investment helped address this issue and reduced the risk of “wasted” training. Employers generally asked for greater access to existing programs and additional state and federal investment into workforce training, particularly for those currently working and needing to upskill to stay current and maintain business competitiveness.

Occupations in Montana's fastest-growing industries, construction, and healthcare, present significant opportunities for public sector investment in workforce training. Montana's Registered Apprenticeship Program (MRAP) plays a crucial role in preparing skilled construction workers while the worker remains in the labor force during training. Construction occupations require diverse skills, such as mastery of construction tools and equipment used for specific trades, and knowledge of construction methods and techniques, building codes, regulations, and compliance requirements. Frequently, skilled trades in the construction industry require occupational licenses that can only be acquired through apprenticeships, such as plumbers, pipefitters and electricians, among others. Many of these occupations require adherence to licensing and certification standards outside of state licensing requirements. Construction businesses will require more workers with the skills and certifications necessary for the jobs, many of which can be conveyed through on-the-job training models like apprenticeship, or earlier in the career pipeline through work-based-learning or pre-apprenticeship opportunities.

Employer feedback related to licensing and credentialing suggested a need for greater collaboration with MRAP and higher education and suggested confusion with an often-expansive array of certifications and training requirements. Montana's business engagement efforts have attempted to reduce this confusion by creating one point of contact for employers, with staff doing the leg work to navigate through the array of training programs and requirements, simplifying for employers

and providing feedback to internal teams to assure continuous improvement of processes and elimination of red tape.

Critical healthcare occupations require medical knowledge, diagnostic skills, team collaboration, and skills related to medical equipment and technology. Short-term training can lead to qualifications for some healthcare occupations such as certified nurse assistants, phlebotomists, and home health aides. Other occupations require more time investment in training but typically result in steadier and higher paying employment. These occupations require a mix of education, training, and licensing and therefore require flexible training strategies that accommodate the wide variety of requirements.

Projected growth in the professional and technical services industry will drive demand for a variety of occupations. Computer and mathematics occupations demand a robust set of technical skills and relevant certifications, with some requiring a bachelor's degree. For occupations such as a computer user support specialist, industry-specific credentials and two-year programs leading to an associate degree are both options. Expanding adoption of AI into professional services occupations requires an emphasis on AI-literacy and AI-skills training that integrate new productivity-enhancing technologies into the workplace to ensure that workers and businesses maintain competitiveness across the market. The remote work opportunities prevalent in many of these roles could benefit workers with disabilities or those in rural areas who typically face barriers to employment due to geographic isolation or mobility challenges. Employers often cite a need for soft skills development for prospective workers in this field, which can be developed through online training or remote collaboration, further increasing accessibility for underrepresented groups.

In the manufacturing domain, production occupations demand hands-on skills, including machine operation, tool proficiency, monitoring, and quality control skills. Some may require certifications relevant to specific manufacturing processes. With the establishment of the Headwaters Tech Hub for photonics and remote sensing technologies, certifications specific to the advanced manufacturing processes of this sector will be more a particular requirement for this growing component of Montana's manufacturing industry. Architectural and engineering occupations require specialized knowledge and skills in design, construction, and project management. Often, this background can only be achieved through two or four-year degrees. Many of these roles may also necessitate professional licensure.

Artificial intelligence (AI) is starting to influence the way people work across a range of occupations in Montana. While some technologies automate routine tasks, others act more like digital assistants, supporting workers rather than replacing them. DLI finds approximately 21% of the state's workforce are employed in occupations highly exposed to AI. AI exposure is measured based on how much of a typical occupation's day-to-day work involves tasks that AI can perform. The types of occupations most highly exposed to AI include office and administrative support, business and finance, legal, architecture, and engineering. Montana ranks 36th in the nation for workforce exposure to AI. Montana's workforce is less exposed to AI than the national average, due to the state's higher concentration of hands-on occupations such as construction, healthcare, agriculture, and food service. While AI's impact is still unfolding, the Governor's 406 JOBS Executive Order has

prioritized the promotion and expansion of opportunities that equip Montanans with AI skills, provide professional development to educators to support incorporating AI skills into career awareness and readiness instruction, and support digital modernization and public-private partnerships that accelerate AI workforce development and adoption across key sectors. Through these actions, Montana is poised to develop a workforce that holds AI literacy skills and the knowledge needed to apply and utilize AI in the workplace to maximize productivity.

The tight labor market in Montana demands that workforce development activities engage more workers, upskill existing workers for greater productivity, and increase cost-effectiveness of all programs to maximize workforce dollars. The state takes a strategic approach to workforce development, encompassing a mix of education, training, and certification programs to meet the needs of every industry and occupation. Montana's 406 JOBS Initiative emphasizes skills-based hiring, credentialing and work-based-learning, and on-the-job training such as apprenticeship that ensures workers can earn and while simultaneously learning the specific skills required by industry across all sectors. The initiative also emphasizes AI preparedness for businesses, workers, and educators to ensure the workforce holds the skills needed to make use of these new tools. By creating an approach that accommodates a wide array of training options, including remote and flexible opportunities, workers with disabilities or those facing other barriers to traditional employment can be better matched to occupations that suit their skill sets and circumstances. This inclusive approach not only maximizes productivity and efficiency in workforce development but also expands the potential talent pool, benefiting both workers and employers. Embracing remote work and accessible training can help Montana tap into underutilized segments of the workforce and address labor shortages while promoting greater economic opportunity for all.

B. WORKFORCE ANALYSIS

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

I. EMPLOYMENT AND UNEMPLOYMENT

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

II. LABOR MARKET TRENDS

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

III. EDUCATION AND SKILL LEVELS OF THE WORKFORCE

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

IV. COMPARISON OF ECONOMIC AND WORKFORCE ANALYTICAL CONCLUSION

Describe areas of opportunity for meeting hiring, education, and skills needs identified in the economy compared to the assets available in the labor force in the state. Provide an analysis of the educational and skill levels of the workforce.

(i) Employment and Unemployment

Montana's labor market remains historically tight, with record-high employment and labor force levels, very low unemployment, and a large pool of nonworking adults whose re-engagement is critical for meeting employer demand. In 2024, total employment in Montana reached over 560,000, an all-time high following several years of strong post-pandemic job growth (US BLS LAUS; 2025 Montana Labor Day Report). Employment has increased by more than 30,000 jobs since 2020, placing Montana among the nation's fastest-growing states for employment over this period and reflecting employers' continued desire to expand output. Despite this expansion, unmet demand for workers remains substantial, with roughly two job openings for every unemployed person and many employers reporting persistent difficulty filling positions.

Montana's labor force also reached a record high in 2024 at approximately 578,500 people, supported by in-migration in previous years and rising participation among young and prime-age workers. However, labor force growth has begun to moderate as pandemic-era migration surges fade and housing affordability and other factors make it more difficult to sustain very high in-migration rates. Nearly 340,000 Montanans are now out of the labor force, most of them older retired adults, underscoring that long-term demographic trends, rather than short-term economic weakness, are the primary constraint on labor supply.

Unemployment remains near historic lows. In 2024, an estimated 17,000 Montanans were unemployed, and the statewide unemployment rate hovered around 3%, well below the national average. With nearly two unfilled jobs for every unemployed worker, nearly all individuals actively seeking work are able to find employment, and labor shortages rather than job scarcity continue to characterize Montana's economy.

As in prior years, Montana's labor force participation rate (LFPR) reflects the combined effects of a recovering labor market and an aging population. Montana's population remains older than the national average, with about 20% of residents age 65 and older compared to roughly 17% nationally (source: U.S. Census, 2023 American Community Survey 1-Year Estimates for Montana, Table DP05). Overall LFPR has largely recovered from the pandemic but is tempered by continued growth in the retired population, which now accounts for about 61% of all Montanans not in the labor force. Pre-retirement adults (age 55 to 64) remain a key driver of participation declines and make up a substantial share of those out of the labor force who still express interest in work, while younger workers under 24 have returned to or exceeded pre-pandemic participation levels. Rising wages and abundant job opportunities have helped draw young and prime-age Montanans into the labor market, but further improvement in labor force participation will require directly addressing barriers such as health, caregiving, and skills gaps.

Strong labor demand has contributed to rapid wage growth in lower-paying, high-turnover sectors such as leisure activities and trade, helping to boost earnings and draw more lower-wage workers into the labor market. Nonetheless, many of these jobs remain relatively low wage and offer limited career advancement without additional training, reinforcing the need to improve skills and support movement up the career ladder for low-income workers.

Native Americans are Montana's largest minority population. Individuals claiming American Indian ancestry alone or with another race comprise about 7% of Montana's labor force and have labor force participation rates similar to the statewide average. However, unemployment among Montana's Native American population remains significantly higher than the state overall, with an unemployment rate nearly three times the statewide average (source: U.S. Census, 2023 ACS 1Year Estimates for Montana, Table S0201). Montana's Native American populations are concentrated in reservation areas but also reside in all major urban centers, meaning efforts to improve employment outcomes must address both on-reservation and urban barriers to work.

Roughly 40,000 Montana workers between the ages of 18 and 64 have a disability, with the most common types of disability being cognitive difficulties followed by hearing difficulties (source: U.S. Census, 2023 ACS 1-Year Estimates for Montana, Table B18120). Approximately 2,900 Montanans with a disability are unemployed, with an unemployment rate more than double the statewide average, and about 35,000 Montanans with a disability are not in the labor force at all, representing a sizeable potential labor pool. The most common disabilities among those not in the labor force are cognitive and ambulatory difficulties, indicating a need for accessible training, workplace accommodations, and supportive services to fully engage this population.

Among U.S. states, Montana continues to have one of the highest shares of veterans in the population, with over 80,000 veteran residents. While unemployment rates for veterans are similar to those of the overall workforce, labor force participation rates are lower, driven by higher rates of disability and an older age distribution compared to nonveterans (source: U.S. Census, 2023 ACS 1Year Estimates for Montana). Addressing barriers for veterans not in the labor force, including service-connected disabilities and challenges translating military experience into civilian credentials, could bring more high-skill workers into the labor market.

Childcare availability and affordability remain major barriers to full labor force participation for many Montana parents. The Montanans for Hire report estimates that nearly 64,000 Montanans are either underemployed or working part-time/reduced hours due to childcare responsibilities, and many additional parents are completely out of the labor force for the same reason. Labor force participation rates for parents have increased over the last several years, but many parents are still working fewer hours than before the pandemic, with parents of children under five reporting the largest reductions in hours worked. Addressing childcare as a barrier is therefore a critical component of the 406 JOBS workforce strategy.

Montana's workforce strategy emphasizes engaging more workers into the labor market, which will require addressing multiple, overlapping barriers. Providers and employers indicated during stakeholder engagement that WIOA clients frequently face constraints such as lack of childcare, limited transportation, court and legal obligations, chronic health or mental health conditions, and

the need for flexible scheduling. Labor market and census data do not fully capture these challenges, but administrative data and targeted studies provide insight into key populations. Assisting individuals with criminal backgrounds can improve employability and reduce recidivism: the three-year recidivism rate among Montana adults leaving the state corrections system remains near 37%. Over the past six years, more than 2,000 individuals with barriers arising from criminal backgrounds have been assisted with WIOA and Wagner-Peyser funding, demonstrating both ongoing need and the capacity of workforce programs to support this group.

Addiction and health issues are another rising challenge in workforce development. Montana's rate of opioid misuse is estimated at about 3.9%, above the national average and increasing, with substance use often intersecting with other barriers such as disability, criminal justice involvement, and unstable housing. The Montanans for Hire report indicates that roughly 19,000 working-age Montanans have left the labor force due to disability or chronic illness, and more than 17,000 cite illness or disability as a primary barrier to work.

The demographic challenges that constrain the workforce include an aging population, elevated disability and health-related barriers, caregiving responsibilities, and geographic mismatches between workers and jobs. These challenges make investments in worker productivity especially important. Identifying training that maximizes the potential of individuals, including those currently out of the labor force, will make Montana's economy more resilient. In addition, expanding access to training with short turnaround times, strong on-the-job components, and early-career emphasis (such as career and technical education programs in secondary schools) is critical to maximizing existing labor pools and sustaining Montana's growing economy.

(ii) CHARACTERISTICS OF THE UNEMPLOYED

Montana's unemployment rate has only recently risen above 3%, remaining below that level for more than three years, and averaging about 2.8% through the first half of 2025. Generally, these low levels of unemployment reflect a tighter labor market than the national average, falling more than a percentage point below the national rate. At this level of unemployment, there are typically between 15,000 and 18,000 unemployed individuals statewide in a given month, and UI claims data show that only a fraction of these workers receive unemployment insurance benefits at any one time. Recent unemployment insurance claimant data indicate that claimants continue to be disproportionately male, in their prime working years (ages 25 to 54), and white, with over half having a high school diploma or less as their highest level of educational attainment (source: MTDLI Job Tracking Dashboard, Unemployment Insurance tab, at lmi.mt.gov/home/job-tracking). Workers with lower education levels remain more likely to appear among unemployment insurance claimants, underscoring the importance of education and training for employment stability.

Montana's non-working population is large and increasingly shaped by retirement and health-related barriers. The Montanans for Hire report estimates that nearly 340,000 Montanans age 16 and older are not in the labor force. Over 60% of these non-working adults, about 217,000 people in 2024, are retirees. Nearly all Montanans over age 64 who are not working report retirement as the primary reason. Other common reasons for not being in the labor force include disability or chronic illness (more than 17,000 Montanans, or roughly 12% of non-working adults),

carrying for family members (including childcare), and attending school or other training. Only a small share of non-working Montanans cite other barriers such as lack of transportation, criminal background, housing instability, domestic violence, or perceived lack of economic opportunity, but these barriers can be severe for the individuals affected (source: Montanans for Hire; MTDLI Job Tracking Dashboard, Finding Workers tab, at lmi.mt.gov/home/job-tracking).

Employers in every region of the state and in nearly all major industries continue to report difficulty finding sufficient workers, with job postings and job openings exceeding the number of unemployed workers by roughly two to one. Labor shortages are especially acute in lower-wage, high-turnover occupations, such as many roles in leisure and hospitality, retail trade, and direct care, where recruiting from other low-pay positions is difficult and where working conditions can be demanding. At the same time, Montana's aging population, rising retiree counts, and growing number of non-working adults with health or caregiving responsibilities are constraining labor force growth and reinforcing the need to bring more non-participants into work.

Given the need for workers across all industries and occupations, Montana's training efforts are targeted at engaging those out of the labor force, ensuring all Montanans have access to training and work opportunities, training incumbent workers to raise productivity and improve retention, providing on-the-job and other work-based learning opportunities, and facilitating short-term training across a broad set of industries and occupations. These strategies are central to the state's 406 JOBS framework and are essential for addressing current labor shortages while preparing for continued demographic pressures on the workforce.

(iii) EDUCATION AND SKILL LEVELS OF THE WORKFORCE

Montana's workforce is well-educated and increasingly credentialed, but many workers still lack the post-secondary qualifications that align with the fastest-growing and highest-paying jobs. A higher-than-average share of Montana adults hold at least a high school diploma or equivalency compared with other states. Over two-thirds of Montana workers ages 25 to 64 have some form of education beyond high school, placing the state near the national average for post-secondary attainment. However, a substantial share of workers still falls into the "some college, no degree" or "high school only" categories, leaving many Montanans just a few steps away from obtaining job-specific training and industry-recognized credentials that are increasingly required in high-demand occupations. Those without post-secondary credentials remain significantly more likely to be unemployed or out of the labor force than workers with an associate degree or higher, underscoring the importance of expanding access to credentialing opportunities (source: 2025 Montana Labor Day Report).

Using MTDLI employment forecasts through 2032 and the Bureau of Labor Statistics (BLS) minimum training requirements, jobs requiring education beyond high school are projected to grow faster than those requiring only a high school diploma or less. The number of Montana jobs that call for some level of post-secondary training—such as certificates, apprenticeships, and two-year or four-year degrees—is expected to increase steadily over the next decade, adding thousands of positions in fields like health care, business services, skilled trades, and technology.

This projected demand reinforces the need to help more Montanans complete short-term credentials and degrees that align with employer needs.

Montana is engaged in several efforts to increase credentialing in the secondary level, hoping to improve the economic outcomes of non-college-going youth. Legislative changes, such as recent passage of the STARS Act in Montana, has made it so that schools are incentivized to have schools participate in work-based-learning, obtain industry-recognized credentials, or participate in dual enrollment programs, contributing to higher levels of work preparedness and credential attainment prior to graduating from secondary school programs.

(iv) Comparison of Economic and Workforce Analytical Conclusion. Describe areas of opportunity for meeting hiring, education, and skills needs identified in the economy compared to the assets available in the labor force in the state.

Opportunities in Montana's labor market center on reconnecting nonworking adults to jobs, moving workers into higher-skill, higher-wage roles in high-demand sectors, and aligning training assets with emerging industry needs. As such, Montana's 406 JOBS Initiative highlights strategies that target these opportunities and maximize investments into sustainable workforce development.

The first area of opportunity is engaging the large pool of Montanans who are not currently in the labor force but could work. Nearly 340,000 Montanans age 16 and older are out of the labor force, and while most are retired and considered outside working ages, more than 100,000 of them are between 16 and 54, representing a sizable potential talent pool alongside current workers. Many of these 100,000 non-working Montanans report barriers such as childcare responsibilities, illness or disability, and criminal justice history, indicating that coordinated strategies address these opportunities can translate into more workers available to fill open jobs.

406 JOBS, in alignment with the America's Talent Strategy pillar of Worker Mobility, engages in workforce strategies that address barriers to bring more people into the workforce. To expand childcare access, Montana is pushing to expand apprenticeship and pre-apprenticeship opportunities in the childcare industry, both reinforcing the childcare sector and expanding critical childcare supply to reduce worker barriers while also training workers into new careers. The 406 JOBS Initiative also includes healthcare among its key sectors which will lead to workers trained in high-wage in-demand healthcare careers who, once working, will bolster quality and access to care. Focus on this workforce is beneficial to all Montanans, and also has residual impacts of reducing barriers to employment around illness and disability due to improved care.

Montana also recently established a new Office of Reentry geared towards coordinating cross-agency workforce efforts for individuals exiting incarceration. This new office's mission aligns with the Integrated Systems pillar of America's Talent Strategy, working to create a more integrated system through which formerly incarcerated individuals access reentry employment and career services, and the supports needs to persist successfully in the community. In turn, improved coordination of services to this population will improve labor force participation, which is directly connected to reduced recidivism, expanding Montana's labor pool, and community safety.

Another opportunity for increased labor force engagement is in Montana's reservation areas where labor force participation rates are among the lowest in the state. Engaging with tribal WIOA partners to better provide services on Montana's reservation areas is a critical opportunity to engage more Montanans into work and training opportunities. MTDLI's Tribal Liaison works to strengthen partnerships with tribal WIOA and economic development efforts and with tribal nations.

A second opportunity arises from the mismatch between the education and skills many workers have today and those needed in Montana's fastest-growing and highest-demand sectors. Over two-thirds of workers have education beyond high school, but many fall into "some college, no degree" or "high school only," and workers without post-secondary credentials are significantly more likely to be unemployed or out of the labor force. At the same time, projections show strong and sustained demand in the six high-demand sectors identified in the 406 JOBS framework: health careers, construction trades, professional and financial services, education and childcare, hospitality and recreation, and advanced manufacturing and computing. This creates clear opportunities to help Montanans convert partial education and work experience into credentials valued by employers, in alignment with the Worker Mobility pillar of America's talent strategy.

Montana's credential registry is one avenue through which this is being approached. In December 2025, the first version of the Montana Credential Registry was published, including certificates, apprenticeships, pre-apprenticeships, degrees, licenses, industry-recognized certifications, and stackable micro-credentials, along with details on the skills and competencies they represent. The registry is designed to help students, jobseekers, employers, and educators explore credential options, compare pathways, and connect education and training to career opportunities in Montana's economy. Use of the credential registry and other tools that illuminate industry recognized credentials will provide valuable information on training opportunities and career pathways available to workers that demonstrate skills and abilities to employers, often through shorter-term training durations. efforts.

Montana also assists in the strategic planning with the state's post-secondary facilities by creating an analysis on the demand for workers from Montana employers compared to the supply of workers exiting Montana's college system (including the registered apprenticeship program). This data source includes graduates from tribal and private training programs, allowing workforce planners to take a comprehensive look at the state's training capacity and its match with the demand from employers. In doing so, the report assists education partners in right-sizing programs and anticipating emerging workforce needs, aligning the state's education systems with the economy, and stretching workforce funding dollars. The results show 62% of high-demand occupations are undersupplied by Montana's postsecondary graduates, including occupations in teaching, healthcare, and construction ("Montana Postsecondary Workforce Report" available at lmi.mt.gov).

The labor market requires training and skill-building opportunities that accelerate learning times and shorten time spent out of the labor market in training. A third opportunity is to expand work-based and short-term training models that fit the realities of a tight labor market and a largely working-age adult population. Montana has strong assets in place, including the Montana

Registered Apprenticeship Program, high-school CTE and pre-apprenticeship programs, and dual enrollment options for high school students. Scaling these models can allow workers to earn while they learn, reduce time out of the labor force, and rapidly build skills in occupations with high projected openings such as construction trades, healthcare support and practitioner roles, production, business and financial operations, and computer and mathematical occupations, among others. By making apprenticeship and pre-apprenticeship expansion a priority initiative in the 406 JOBS work plan, Montana is also emphasizing industry-driven and employer validated training, in line with the Industry-Driven Strategies pillar of America's Talent Strategy.

Montana is also reevaluating allocations between the WIOA programs, shifting unused Dislocated Worker funding into Adult and Rapid Response activities to better target funding towards incumbent workers and those out of the labor force. With Montana's unemployment rate at all-time lows, the funding demand for Dislocated Worker funds is low. However, the funding mechanisms must remain flexible enough to allow the state to quickly shift funding back to dislocated workers in an economic downturn.

2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

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

A. THE STATE'S WORKFORCE DEVELOPMENT ACTIVITIES

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

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

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

B. THE STRENGTHS AND WEAKNESSES OF WORKFORCE DEVELOPMENT ACTIVITIES

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

C. STATE WORKFORCE DEVELOPMENT CAPACITY

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

A. The State's Workforce Development Activities

Addressing Montana's significant workforce shortage is a multifaceted effort. Montana's Workforce development activities are organized around the 406 JOBS framework, developed by the SWIB (administratively attached to MTDLI) that focuses on industry-led workforce development that coordinates the Montana Department of Labor and Industry (MTDLI), the Office of the Commissioner of Higher Education (OCHE), the Montana Department of Public Health and Human Services (which includes the TANF and SNAP E&T programs and Vocational Rehabilitation & Blind Services (VRBS)) and Adult Education to expand pathways to careers, eliminate barriers preventing workers from entering or move up in the workforce, and target key industry sectors in MT's economy.

The initiative is centered on three planks that form the strategic framework:

- 4 Pathways to Work - College, Career, Military, Entrepreneurship
- 0 Barriers to Employment - Prepared Employees, Engaged Employers, Responsive System
- 6 High Demand Sectors - Construction Trades, Health Careers, Education & Child Care, Advanced Manufacturing & Computing, Recreation & Hospitality, and Professional & Finance Services

Priority tasks identified in this workplan are those that will have a measurable impact on achieving the following broad goals of 406 JOBS:

- Every Montanan with a pathway to a career and a plan to achieve it.
- Reduce barriers to employment for individuals who have left the workforce
- Achieve consistent quarterly growth in the labor force participation rate
- Increase the number of Montanans achieving financial self-sufficiency

The 406 JOBS Work Plan establishes 12 priority initiatives that guide MTDLI's work over the next year and beyond to focus on outcomes addressing the projected workforce shortage in Montana.

The 12 priority initiatives include:

1. Increase Registered Apprenticeship Pathways
2. Prepare Workforce for Artificial Intelligences and Automation Opportunities
3. Establish Local Sector Partnerships in High Demand Sectors
4. Address Child Care Shortage to Enable Labor Force Growth
5. Reduce Barriers to Employment Through Disability Empowerment
6. Highlight Military Service and Support Veteran Transitions
7. Establish Office of Reentry Programs
8. Launch Statewide Credential Registry
9. Modernize Career Exploration Tools
10. Expand Jobs for Montana's Graduates & Empowered Sites
11. Tell The Story of Workforce in Montana
12. Improve System Leadership, Coordination, & Communication

These initiatives reinforce a simple but powerful goal: ensure every Montanan has a pathway to a career and a plan to achieve it. They also affirm SWIB and MTDLI's role as a central driver of workforce alignment across education, training, and employment systems statewide in alignment with America's Talent Strategy.

The Veterans State Grant (JVSG) program, along with other workforce programs, is operated by MTDLI. Workforce representatives assisting clients through the JVSG program are housed within MTDLI's Job Service Centers and report up through the MTDLI reporting structure to support cohesive delivery of these services in a unified support system for veterans. MTDLI is also working on additional improvements to JVSG program execution, particularly enhancing communication and training among DVOP's and Job Service Managers to align program activities with the goals established within the 406JOBS plan.

Analysis of how the higher education system is meeting business needs is completed through a joint project between MTDLI, OCHE, and several private colleges to share data and perform analysis to ensure that the state's workforce training systems align effectively with economic needs.

https://lmi.mt.gov/_docs/Publications/LMI-Pubs/Special-Reports-and-Studies/MTCollegeReport2022.pdf

Thirty-six private and public institutions comprise Montana's post-secondary education system, graduating over 11,700 students annually, not quite enough to fill the estimated 16,800 annual job openings. This analysis also identifies what occupations require additional training capacity to meet future workforce needs, and which programs are over-producing graduates.

MTDLI finds that graduates of the higher education system post median incomes of \$31,800 a year after graduation, rising to approximately \$54,000 ten years later. Those with prior work experience in the Montana labor market tend to earn about \$11,000 more in the year following graduation, highlighting the importance of practical experience. Retention of these workers in the Montana labor force varies by degree type with 85% of associate degree graduates working in Montana after graduation compared to 65% of those bachelor's degree graduates.

Individuals who complete MRAP are also included in this analysis. Growing MRAP has been a key workforce strategy in the state for several years, with program expansion often funded through federal expansion grants and increased interest from business sponsors after passage of a state-level tax credit for MRAP sponsors. Graduates of MRAP earn double the wage earnings of those with an associate or bachelor's degree after one year, with over 94% of workers remaining in Montana after completion, often with the same employer. This public-private partnership is the primary mechanism for preparing workers in construction trades such as plumbing and electrical occupations. MTDLI is working to expand apprenticeship into other in-demand occupations, such as childcare workers, teachers, and healthcare occupations.

MTDLI is also looking to use MRAP to increase labor force participation among those with criminal backgrounds through a four-year Partners for Reentry Opportunities in Workforce Development (PROWD) grant secured through USDOL in 2023. This grant allows MTDLI to partner with Montana's residential reentry facilities to train Montanans returning from federal incarceration,

placing them in apprenticeship opportunities and providing additional guidance and support through WIOA supportive services and case management. The program also will build on MTDLI's strong partnerships with apprenticeship sponsors, corrections teams, and local reentry facilities.

In alignment with America's Talent Strategy Pillars, growing apprenticeships is a priority initiative as it ensures direct-to-career pathways for employment are readily available across the state. Providing ways for workers to access training in their local communities, achieve a recognized credential, and earn a living while training helps to reduce barriers to employment. Expanding pre-apprenticeship programs in high schools helps to prepare students for success when entering the workforce and youth apprenticeships can reach young people facing barriers to employment in new ways. Throughout the implementation of the 406 JOBS Initiative, local sector partnerships are encouraged to consider apprenticeship as a sector strategy for local talent development, including pre- and youth apprenticeships. Reducing barriers to apprenticeships, including lack of employer awareness, occupational licensing restriction, and incentives for apprentice mentors are a priority.

The SWIB was also recently named the workforce lead coordinator for the Headwaters Tech Hub. Montana received a designation as a rural regional tech hub for photonics and remote sensing technologies. The SWIB will be working with over 40 photonics companies and several private and public workforce partners to organize and coordinate workforce training efforts associated with the Headwaters Hub. MTDLI is working with the state energy office to coordinate workforce efforts for Training for Residential Energy Contractors (TREC) and other emerging occupations supporting infrastructure spending.

The state has also been working to strengthen partnerships with other WIOA partners with the first in-person gatherings between partners since the pandemic. The first effort focused on partnerships within state agencies. MTDLI staff (including DVOP representatives) met seven times throughout the state with VRBS, Adult Education, the four tribal WIOA programs, and Accelerate Montana. The events provided training, collaboration opportunities, and a focus on increasing and strengthening referrals for state service providers, particularly for veterans and those with disabilities. Over 250 provider staff gained a deeper understanding of serving clients increasing referral services, braiding funding streams, and working more cohesively within local communities. Invitations to future events will include additional WIOA partners (such as TANF and SNAP E&T programs), private providers, local economic development groups, and other nonprofits engaged in workforce training.

The state utilizes the JVSG program to support workforce development activities for veterans. These programs are housed within MTDLI to reduce administrative costs and maximize the funding to clients and to improve coordination with other workforce programs. The JVSG program provides grants to fund Disabled Veterans' Outreach Program specialists, whose aim is to promote employment opportunities for veterans. In Montana, DVOP specialists offer intensive services tailored to meet the employment needs of disabled veterans, with a particular emphasis on conducting outreach and assisting those who are most severely disabled.

MTDLI is making an effort to increase partnerships with the state's tribal WIOA partners and Tribal Employment Rights Offices (TERO). MTDLI hired a tribal liaison, who has worked to increase

partnerships between the tribes and the WIOA-funded workforce efforts. In December 2023, representatives from Adult Education, VRBS, MRAP, and MTDLI (including those representing veterans' programs) were asked to meet with the tribal TERO leadership to discuss workforce initiatives and areas for improvement. Continued conversations are a large opportunity for stronger tribal partnerships. The VRBS strategic plan also focuses on extending service into tribal communities, hoping to increase outreach and communication with tribal partners, and to develop partnerships with tribal colleges.

The SWIB also engaged in stakeholder feedback efforts with local governments, business communities, tribal partners, economic development organizations, WIOA providers, and staff in preparation for strategic planning and the development of the state plan. This engagement solicited feedback from rural, reservation, and urban communities throughout the state. Feedback is interwoven throughout this state plan and will strengthen partnerships between community service providers, employers, and local governments throughout the state.

A Capacity Building Institute (CBI), led by the state education agency's Special Education department with key strategic partners VRBS and MTDLI, prioritized the integration of vocational rehabilitation into other WIOA program processes for youth. The integration aligns with WIOA resources, garnering support from the State Rehabilitation Council and SWIB. The CBI aims to increase opportunities and awareness for youth with disabilities in the workforce, guided by supportive services. The relationships and communication streams established through these initiatives will be nurtured with regular gatherings and training sessions focused on outcomes and deliverables.

Additional Montana programs that operate alongside core programs play a vital role in supplanting WIOA activities and expanding potential opportunities in workforce development. The Incumbent Worker Training (IWT) program offers grant funding to private sector businesses and offsets skill-based training costs for existing workers, promotes skill development, and preserves jobs. The Governor recently developed legislation to expand the IWT program for more Montana businesses, increasing the demand for the program. Jobs for Montana Graduates (JMG) connects students with local employers, instilling professional and leadership skills and enhancing career readiness to empower students for success. The State Displaced Homemakers Program intervenes in individuals' lives after a significant loss due to death, disability, or divorce, providing vocational counseling, job training, and search assistance. HELP-Link, coordinated by MTDLI/JS offices as of 10/1/2025, serves state Medicaid Expansion recipients. Temporary programs, such as the ARPA Rapid Retraining Program, upskill individuals and support businesses in adapting to evolving job demands. These programs collectively contribute to enhancing Montana's workforce and supporting individuals in their career pursuits.

MTDLI has also increased business engagement activities using WIOA, Wagner-Peyser, and state funding streams. Montana's labor shortage has made it difficult for businesses to find workers but has also created an environment full of opportunities for marginalized worker populations and engagement in workforce development activities by businesses, nonprofits, and policy makers. Businesses and economic development organizations are eager to partner on new initiatives and engage with worker populations that previously overlooked.

To take advantage of this opportunity, MTDLI re-organized the Workforce Services Division and reallocated resources to expand business engagement activities. The newly launched business engagement team is successful in giving personalized workforce assistance to employers while meeting systematic workforce needs. The team meets with Montana businesses to identify worker needs, then serves as the conduit for the business to work with various workforce programs and reduces the confusion about different agencies and programs. Business outreach identified confusion about the many different workforce programs as a barrier for employer engagement. When consistent challenges or workforce needs emerge across multiple employers or geographies, the business engagement team works with business representatives, high schools, colleges, tribal colleges, universities, and other entities to set up training programs that address the workforce need.

For example, nursing homes in several rural areas had difficulty finding Certified Nursing Assistants (CNAs), reducing the quality and quantity of care available in the communities. The business engagement team recruited trainers and Job Service Montana (JSM), WIOA Youth and WIOA Adult programs, and tribal WIOA providers to find workers to be trained. The CNA training program on the Blackfeet reservation proved successful and was followed by additional trainings held in Columbus and Libby. The trainings held on the Blackfoot reservation was particularly meaningful, as the CNAs trained included tribal members and other local workers with greater cultural understanding, leading to better patient outcomes for the healthcare facility.

Montana is also working to increase operational efficiency with increased feedback from providers and staff about client outcomes for greater data-driven decision making. The Governor made IT-system modernization a priority for his administration, including an upgrade to the current case management system, MWORKS, which was running on obsolete and unsupported technology. In late summer of 2024, and in alignment with America's Talent Strategy Pillar III, MTDLI launched its new case management system for the WIOA Titles I and III, including veterans' services. EmployMT features include better web-services, data sharing between systems storing unemployment data, TANF and SNAP eligibility, Medicaid eligibility, and potentially apprenticeship data, and reporting capabilities that improve accountability for providers. In the months since launch of the enhanced EmployMT case management system, Montana has incorporated a job seeker and business portal that allows external users to access key features facilitating enrollment into WIOA programs for job seekers and creating business and training provider access to a unified portal. Job seeker functions include allowing users to easily input registration data and upload documents for eligibility verification, easing the data collection process for program intake and collecting information to be used across programs embedded withing EmployMT included WIOA Adult, Dislocated Worker, Youth, RESEA, and others. Alongside the development of this IT system, the Workforce Services Division is also developing additional metrics and data dashboards to provide feedback to staff, managers, and providers about the employment outcomes of clients, allowing for better interaction and understanding of the WIOA performance metrics. This information must be provided in a way that protects individual PII but also provides feedback on performance so that best practices can be identified.

The above initiatives have helped bring the state’s workforce programs closer together, but stakeholder feedback suggests Montana needs to continue efforts to coordinate and collaborate with partners. Tight labor markets have brought new organizations and stakeholders into the existing efforts to develop the workforce, and the interest in workforce development has never been higher in Montana. However, the large number of stakeholders and organizations involved in workforce efforts have resulted in a greater need for collaboration and communication to ensure funding is used effectively, and organizations are working in conjunction with the existing system.

B. The Strengths and Weaknesses of Workforce Development Activities

Montana’s workforce development activities in 2026 reflect a maturing, increasingly integrated system that is now guided by 406 JOBS as the unifying statewide framework and is strongly aligned with America’s Talent Strategy and its emphasis on coordinated, industry-led education and workforce systems. The state continues to leverage tight labor markets, strong business engagement, better relationships with tribal nations, and robust data capacity while working to overcome persistent challenges in rural service delivery, systems modernization, and the implications of a graying labor force.

Strengths of workforce development activities

Montana has formalized a unifying, statewide approach to workforce development through the 406 JOBS initiative, which orients all core and partner programs around “four pathways to employment, zero barriers to work, and six high-demand sectors,” and designates the State Workforce Innovation Board (SWIB) as the central coordinating body. This framework aligns state efforts with America’s Talent Strategy, which calls for industry-driven talent pipelines, expanded work-based learning, and streamlined, cross-agency investments, positioning Montana as a strong partner and an early adopter of the shift toward integrated education–labor strategies.

Montana’s workforce system benefits from sustained and growing engagement from businesses, industry associations, and policy makers who are leveraging the current labor shortage to expand opportunities for workers who face additional barriers to employment. The Department of Labor and Industry (MTDLI) has expanded its business engagement capacity and strengthened partnerships with nonprofits, economic development organizations, tribal governments and workforce entities, and education and training providers, including the Montana University System (MUS) and private and tribal colleges, and the Montana Office of Public Instruction. Enhanced coordination across the k-20W system and the now-combined WIOA/Perkins planning efforts reduce duplication, center industry need, and better prepare students for the jobs of today and tomorrow.

The Montana Department of Labor and Industry (MTDLI) has established an Office of the Tribal Liaison to strengthen government-to-government relationships with Montana’s tribal nations and ensure tribal voices are centered in workforce strategy and service design. The office serves as a dedicated point of contact between MTDLI and tribal governments, tribal colleges, and tribal workforce and education partners, facilitating consultation, co-planning, and coordinated implementation of programs across the WIOA core and partner programs. By housing this function

within MTDLI, the state is better positioned to align workforce initiatives with tribal economic priorities, expand access to high-quality employment and training services in Indian Country

The state's more populous areas have developed robust regional collaborations across economic development organizations, K-12 systems, postsecondary institutions, employer networks, and community-based organizations, which serve as platforms for sector partnerships and coordinated responses to employer demand. At the same time, rural communities continue to innovate by leveraging regional relationships, shared staffing models, and creative use of space to expand access to services, demonstrating the flexibility and problem-solving capacity of local partners.

Montana's research and data units at MTDLI, the Montana University System, tribal colleges, and partner institutions remain a core strength that informs policy, program targeting, and continuous improvement. These units support longitudinal data sharing and analysis comparing graduate supply with employer demand, implement rigorous evaluations such as randomized studies of RESEA and cost-effectiveness analyses for WIOA and JVSG, and are developing improved dashboards to give providers timely insight into participant outcomes and labor market trends.

The Montana Registered Apprenticeship Program (MRAP) continues to post record participation and sponsor growth and is central to the state's strategy to expand earn-and-learn pathways in high-demand occupations. This emphasis aligns with America's Talent Strategy's focus on scaling Registered Apprenticeship and high-quality work-based learning as primary tools to address employer skill needs and to create alternatives to four-year degrees.

Montana's workforce vision is increasingly data-driven, industry-led, and coordinated across education and labor, which mirrors the federal emphasis on cross-agency alignment and talent marketplaces under America's Talent Strategy and recent interagency agreements between the U.S. Departments of Labor and Education. This alignment creates a strong platform for future waivers, pilots, and joint initiatives under WIOA and Perkins that leverage federal flexibility to streamline programs and better support both employers and workers.

Weaknesses, challenges, and opportunities

Montana's rural character continues to present challenges for service delivery, particularly in ensuring consistent physical and programmatic presence of WIOA and Wagner-Peyser staff in smaller and remote communities. Employers and community partners report a need for more regular, visible on-the-ground staff presence and expanded use of cost-effective models such as shared or donated office space, rotating schedules, and mobile and virtual services to reach businesses and jobseekers across the state. The opportunities AI has created for innovation in this space will inform Montana's efforts to reach all citizens with the same quality service, regardless of zip code.

The state's ability to fully scale work-based learning and career and technical opportunities for high school students remains constrained, especially in rural and frontier districts with limited staffing and scheduling flexibility. While interest and policy attention are high, schools in many communities still find it difficult to manage complex scheduling, and sustain the variety and depth of employer partnerships needed for high-quality work-based learning, pre-apprenticeship, and

dual-credit opportunities at scale. Our teams continue to focus support in these areas and share best practices across regions to support our schools, and forthcoming career exploration technology modernization efforts will expand our ability to do so.

MTDLI has completed the transition to a new workforce case management system and business intelligence tools, moving away from legacy platforms that previously limited the timeliness, accessibility, and actionability of performance feedback for local partners and subrecipients. While the initial launch provided a minimum viable product (MVP), we are actively engaged in customizing and enhancing the system to fully meet the diverse needs of our workforce partners. Efforts are underway to expand standardized dashboards, cross-program insights, and comparative performance data, ensuring that providers have the tools necessary to drive rapid quality improvement and align with 406 JOBS priorities.

Demographic shifts and a graying labor force present additional challenges as many experienced workers approach retirement, threatening to deepen skill gaps in key industries and rural communities. At the same time, this transition creates opportunities to expand mentoring, phased retirement, and knowledge-transfer models, and to strengthen upskilling and reskilling strategies that keep older workers engaged while preparing younger workers to move into critical roles.

These challenges are emerging in parallel with the rapid development of artificial intelligence (AI) and related technologies, which pose significant opportunities for Montana's workforce system. If thoughtfully governed and aligned with 406 JOBS and America's Talent Strategy, AI can help the state address persistent barriers by supporting virtual and hybrid service delivery in rural areas, enhancing career exploration and skills matching tools for jobseekers, improving data integration and real-time performance feedback, and enabling more precise targeting of work-based learning and training resources to the needs of employers and workers across the life course.

C. State Workforce Development Capacity

Montana is committed to sustaining a strong workforce system through statewide collaboration, guided by the 406 JOBS framework and modeled to meet the expectations set forth in America's Talent Strategy. The state prioritizes ongoing evaluation and enhancement of Montana's education and workforce systems to ensure effective coordination of strategies and services, a comprehensive understanding of the state's workforce needs, and proactive solutions to emerging challenges. The 406 JOBS framework provides a common vision that improves coordination across core programs and partner agencies, clarifies shared priorities, and anchors interagency governance and decision-making.

Montana has also focused on increasing the efficiency and effectiveness of its workforce investments. The state workforce agency has fully modernized IT systems to gain staffing efficiency and improve data-driven feedback on performance. The new, modernized workforce case management system is central to this effort: it is designed to streamline staff workflows, reduce duplicative data entry, and provide more timely, actionable performance information to state and local partners. By pairing this system with expanded business intelligence tools and dashboards, MTDLI is strengthening its capacity to monitor outcomes, identify gaps, and support continuous

improvement across WIOA titles and partner programs, in alignment with the performance focus embedded in 406 JOBS and America’s Talent Strategy.

At the same time, Montana has continued to expand and formalize collaborative approaches to stretch limited resources and enhance service quality. The state encourages employer resource contributions when establishing new programs, including donated space, equipment, and in-kind support for classes and worker training activities, and staff routinely work to braid funding from multiple programs and private investments. Shared office space and more flexible remote-work arrangements enable WIOA, JVSG, VRBS, Adult Education, MRAP, and other workforce partners to co-locate or coordinate more efficiently, spreading overhead across programs and making services more accessible for customers. Montana is actively pursuing joint projects that improve customer experience, including this fully combined WIOA/Perkins plan, mapping and aligning credentials across agencies, strengthening ties with economic development entities, coordinating with health and human services to serve Medicaid participants and verify community engagement requirements, and deepening partnerships with education systems to expand awareness of and participation in career and technical education and attainment of industry-recognized credentials.

To further build system capacity and better serve priority populations, MTDLI has established an Office of Reentry and an Office of the Tribal Liaison. The Office of Reentry focuses on improving employment outcomes for individuals returning to Montana communities after incarceration by coordinating with corrections, community-based organizations, employers, and training providers to reduce barriers and connect participants to quality jobs and career pathways. The Office of the Tribal Liaison strengthens government-to-government relationships with Montana’s tribal nations and ensures tribal perspectives are embedded in workforce strategy, program design, and implementation, supporting culturally responsive services and expanded access to opportunities in Indian Country.

These collaborative efforts strengthen Montana’s capacity to implement a coordinated, responsive, and performance-driven workforce system that advances the goals of 406 JOBS and America’s Talent Strategy.

B. STATE STRATEGIC VISION AND GOALS

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

1. VISION

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

2. GOALS

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

(A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment⁸ and other populations.⁹

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

3. PERFORMANCE GOALS

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

4. ASSESSMENT

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

1. Vision

Montana aims to increase the number of Montanans achieving self-sufficiency. Grounded in the 406 JOBS framework, Montana is committed to a workforce vision that emphasizes 4 pathways to work, 0 barriers to employment, and 6 high-demand sectors as the organizing structure for how partners engage employers, serve workers, and align education and training with labor market demand. This vision recognizes Montana's unique geography and economy, the realities of a persistently tight labor market, and the need to bring more Montanans into the labor force through flexible, skills-based, and work-based training models that allow workers to learn while they earn.

Montana envisions a system where all Montanans, regardless of where they live or the barriers they face, can access clear, supported pathways into careers that lead to family-sustaining wages. This includes workers and jobseekers in urban, rural, frontier, and reservation communities; youth and young adults; veterans; individuals with disabilities; former offenders; older workers; low-income Montanans; and others who have been historically disconnected from the labor force. The vision calls for a workforce system that is responsive to those it is meant to serve.

To realize this vision, Montana will center industry voices in workforce and education efforts so that businesses are co-designers, not just end-users, of training and education programs. Through 406 JOBS and the State Workforce Innovation Board, Montana will build regional, employer-led sector partnerships in each of the six high-demand sectors to identify priority occupations, articulate clear skill and credential requirements, and shape training strategies such as Registered Apprenticeship, and pre-apprenticeship. By leveraging sector partnerships, Montana's vision is for employers, education and training providers, and workforce partners to act as a unified talent development ecosystem that helps workers move into higher-wage, higher-skill roles while helping businesses fill vacancies and increase productivity.

Montana's vision also emphasizes building a more fully integrated and user-friendly workforce system that minimizes duplication and maximizes impact. The state will align policies, data systems, and operational practices across WIOA core programs and partner programs, including Adult Education's transition into the Department of Labor and Industry, the Vocational

Rehabilitation and Blind Services program, Jobs for Veterans State Grants, and the Senior Community Service Employment Program. This includes continued development of a shared case management infrastructure (such as EmployMT), common referral and co-enrollment practices, more co-located service delivery sites, and cross-program strategies for priority populations, so that jobseekers and employers experience the system as a single, coordinated network rather than a set of disconnected programs.

At the same time, Montana's vision recognizes that long-term economic growth depends on strategic investments in talent pipelines that start early and extend across a lifetime. The state will expand credential attainment in secondary and postsecondary education, build and maintain a statewide credential registry to clarify which credentials are industry-recognized and in-demand, and increase opportunities for youth, including youth with disabilities and youth facing other barriers, to connect with employers and earn credentials of value before and shortly after high school graduation. This vision includes better use of labor market data, a more advanced ETPL, and sector analyses to guide individuals toward high-wage, high-demand pathways and to inform education and training providers as they design and refine programs to connect more closely with employer needs.

Finally, Montana's vision is to operate a workforce system that is forward-looking, data-driven, and fiscally responsible. Montana will prioritize strategies that improve cost-effectiveness and measurable outcomes: expanding incumbent worker training and apprenticeship to upskill current employees; aligning services and investments under 406 JOBS; and using labor market information and stakeholder feedback to continuously improve services. As artificial intelligence and other technologies reshape work, Montana will integrate AI literacy and AI-related skills into workforce and education efforts, support employers in responsible adoption of AI and automation, and ensure that workers, including those in rural and underserved communities, are prepared to adapt and thrive.

2. Goals

(A) Montana's goal is that every Montanan has a pathway to a career and a plan to achieve it. Acknowledging that training time and delayed or lost earnings can be a barrier to participation in upskilling and training programs, Montana's goals include identifying and expanding new opportunities for apprenticeship, pre-apprenticeship, on-the-job training, and skill-based credentialing that reduce training times and may even allow workers to earn income while preparing workers for high-wage and in-demand jobs. Additionally, Montana aims to bring in-demand skill and credential attainment at the earliest stages, bringing credentialing information and opportunities into secondary schools and youth programs. Montana's recent addition of an Office of Reentry assures services are accessible to former offenders, including both training and supports needed to assure a smooth transition back into society post-incarceration. Montana's goals for preparing an educated and skilled workforce are to leverage partnerships with Perkins, WIOA core, and other workforce training partners to improve access to workforce training.

As another example of strengthening partnerships with other workforce training partners, MTDLI works with TANF and SNAP Employment and Training programs, sharing office space and co-

enrolling clients into WIOA programs for wrap-around support. These Montanans are most at-risk for disengagement with the labor force and their community, and collaboration between the Employment & Training services and WIOA is critical for their success. Engagement of low-income Montanans into worker training programs is critical to ensuring the benefits of Montana's strong economy is shared by all workers and increases the worker supply.

Montana is also creating better coordination between the WIOA Title I and II programs. In 2025, legislation and an order by the Governor transitioned the Adult Education Program from the Montana Office of Public Instruction (OPI) into the MTDLI, in effort to bring WIOA programs together and foster better integration and collaboration between the programs. Montana's decision to house WIOA Title II Adult Education at the Montana Department of Labor & Industry mirrors the federal ED-DOL interagency agreements by consolidating core education and training programs under the workforce agency to streamline administration, align adult education with WIOA Titles I and III, and create a more cohesive employment-focused system.

To facilitate more frequent co-enrollment with other workforce programs, MTDLI's policy teams are working to simplify enrollment and when possible, unify eligibility across Montana's WIOA programs. MTDLI has also increased the sharing of office space with other WIOA partners, which works to reduce overhead costs for all programs.

Montana also plans to continue efforts to improve reporting, participation, and outcomes in Montana's WIOA Youth program. MTDLI has brought on a performance analyst to work with program managers and providers to expand understanding of performance measures and reporting in addition to encouraging greater outreach efforts to enroll more youth in the program. MTDLI staff worked to provide extra support to providers whose performance metrics fell below negotiated performance rates. Providers in this category were asked to develop a performance improvement plan, identify areas of specific support and training needs, and were required to have program staff participate in the biannual new provider training. Providers needing this focused support will continue to meet quarterly with MTDLI staff to track progress, review performance data, and address any continued areas of underperformance. Initial efforts in this space have already yielded substantial performance improvements across multiple indicators.

Montana also targeted individuals with criminal backgrounds as a potential group of workers who could increase the worker supply while bringing more opportunities to Montanans through work. Montana's 2025 legislative session saw establishment of the Office of Reentry- a new team at MTDLI to coordinate reentry efforts across workforce partners. Working with the Montana Department of Corrections and other partners, MTDLI's Office of Reentry is facilitating conversations regarding better work preparedness programming for incarcerated individuals, improved referral processes that connect recent prison releases with Montana Job Service offices, and ways to connect workers with employers post-release. MTDLI is using the agency's PROWD grant to work with federal residential re-entry centers to place individuals exiting federal custody into Registered Apprenticeship programs, with case management, WIOA supportive services, and mentoring provided through JSM. Apprenticeship will provide a constant structure and support system while the worker transitions out of the residential re-entry center and into the workforce.

Montana works to reduce employment barriers for caregivers and parents by increasing access to affordable childcare. MTDLI is working to expand a pilot pre-apprenticeship program to provide short-term training, resulting in a Child Development Associates Credential for childcare workers. This pre-apprenticeship was made possible by a collaboration between the Montana Department of Public Health & Human Services and MTDLI's business engagement team. In addition, the business engagement team has been working with several local communities to start community childcare facilities, while the data team has been working with the Montana Legislature to provide research and economic information on the childcare workforce to assist in policy development to address a lack of childcare in the state. These efforts will likely continue throughout the next two years.

MTDLI is also increasing connections with tribal WIOA partners and economic development organizations. The Department recently established the Office of the Tribal Liaison, who has been successful in establishing increased communication, partnership, and consultation between MTDLI's various workforce programs and tribal leaders. Montana looks to increase these connections, sharing information and workforce efforts with tribes when requested.

With record low unemployment rates, Montana's workforce training programs must work closely with businesses to help current employees learn new skills, boost productivity, and earn higher wages. Due to the worker shortage, Montana's employers and business groups are eager to partner with MTDLI on workforce development. Montana's goal is to continue engaging employers through strategies such as local sector partnerships, using on-the-job training options such as apprenticeship and pre-apprenticeship programs, encouraging employer investment in workforce initiatives, and including industry-recognized credentials in Montana's credential registry. By identifying industry needs and incorporating them into planning and training efforts, Montana aims to meet employer demand, increase worker productivity, and raise wages.

Montana has expanded eligibility for the state-funded Incumbent Worker Training (IWT) Program to increase grant opportunities for Montana businesses who want to upskill their existing workforce. Businesses must show increased productivity or increased wages from the training to access grant funds. MTDLI continues to see strong demand for IWT grant funds, particularly among manufacturers, emphasizing the need for training options that meet business need and upskill workers while they are employed.

MTDLI also continues to refine the services of our business engagement team to conduct outreach to employers about workforce needs and engage with workforce partners to address these needs, allowing businesses to utilize the convenience of a wide variety of programs with just one point of contact. The business engagement team has been successful in addressing childcare challenges in northwestern Montana, creating a welding program with significant employer engagement and commitment in central Montana, and has launched CNA trainings in reservation and rural communities in the state.

Labor market data prepared by MTDLI's economist and data teams often serves as a tool to engage with the business community, particularly through presentations to statewide business and industry groups and through special workforce reports produced on specific topics, including housing, migration, aging workers, and nursing occupations. This labor market data also serves as a

guide to identify Montana’s most in-demand sectors and the occupational skills or credentials required for jobs in those sectors. This work helps guide workforce efforts. For example, the Montanans for Hire report and the job projections data were utilized to determine key industry sectors and priority initiatives in Montana’s 406 JOBS work plan.

Montana continues to expand Registered Apprenticeship as a key training model, currently using federal grant funding to increase capacity and find internal efficiencies to allow for continued program growth with restricted staff and funding streams.

Another area of focus for Montana is short-term, remote, and work-based credentialing so that workers can upskill while residing in their home communities, remaining employed or finding new employment. This allows workers to upskill without having to relocate or uproot their families- which can be a barrier for many in rural communities. These efforts involve significant employer engagement to host work-based learning experiences or to collaborate with training partners to develop short-term, skill-based training in a local setting.

3. Performance Goals - tables within each core program section are complete.

4. Assessment

In order to assess the overall effectiveness of Montana’s workforce development system and ability to meet the state’s goals, assessment will occur at the state and program levels. Montana seeks to provide economic opportunity through work for citizens in urban, rural, and reservation communities. Assessment of this work occurs at the state level using labor market data to understand where our workforce systems have been impactful, and where improvements are warranted. The 406 JOBS Initiative has identified 6 key sectors for targeted workforce development activities, and MTDLI is in the process of producing a sector analysis for each key sector to reveal potential areas of emphasis within each sector. This includes key occupations and training programs to target. Examples of these include the already published construction and health careers sector analyses.

https://lmi.mt.gov/docs/Publications/SectorAnalysis/25_SWIB_Construction_Web.pdf

<https://lmi.mt.gov/docs/Publications/SectorAnalysis/HealthCareSectorAnalysis.pdf>

In addition to producing data that informs and guides efforts, Montana assesses progress toward our goals based on continuous stakeholder feedback that is conducted via specialized stakeholder engagement sessions and recurring stakeholder engagement within CMTs, tribal outreach efforts, and other partner and stakeholder venues.

At the program level, Montana relies on data to assess impact. Selected examples of analyses conducted by MTDLI’s Data and Operations (DO) Bureau economists and analysts that help inform Montana’s progress toward its goals and implementation of its vision include:

1. In-depth evaluation of the state of training programs at Montana postsecondary institutions, with supply and demand as well as outcomes analyses for each postsecondary program. An updated version of this report will be published in 2027, with additional efforts taken to better incorporate trainings and offerings from institutions outside the university system including Joins

Apprenticeship Training Centers (JATCs). The data produced in this report is used to crosswalk workforce training activity to analyses of supply and demand as well as the quality of outcomes

https://lmi.mt.gov/_docs/Publications/LMI-Pubs/Special-Reports-Studies/MTCollegeReport2022.pdf

2. The Data and Operations Bureau is partnered with the Minneapolis Federal Reserve Bank to conduct an impact evaluation of service delivery strategies used in the RESEA program. In this evaluation, a Randomized Control Trial (RCT) approach was used and results informed Montana's service delivery model for RESEA and other programs.

<https://www.minneapolisfed.org/research/community-development-working-papers/final-report-for-the-enhanced-services-pilot-of-the-montana-reemployment-services-and-eligibility-assessment-program>

3. The Data and Operations bureau completed a study of non-working individuals with an emphasis on those out of the labor force. This Montanans for Hire report is used to inform populations that may need to be targeted to help address the state's workforce shortages while also helping define strategies to assist those populations.

https://lmi.mt.gov/_docs/Publications/LMI-Pubs/Labor-Market-Publications/25_NonWorkingPopulationReport_Final.pdf

4. An evaluation of trends in the Montana Registered Apprenticeship Program (MRAP), including participation levels, employment and wage outcomes, trends in adoption of new pathways, among other things. This report is updated annually and used to measure success program growth.

https://lmi.mt.gov/_docs/Publications/LMI-Pubs/Special-Reports-and-Studies/24_ApprenticeshipReport_Final.pdf

At both the state and program level, information from formal assessments and stakeholder feedback is used to assess progress and inform actions taken. At the state level, data and stakeholder feedback is shared across partners and used during quarterly WIOA core partner meetings at the local level to refine service delivery. A recent example of this is a renewed focus on referral processes between partners stemming from summer 2023 WIOA partner meetings where stakeholder feedback on referral processes was discussed.

Another change is the recent addition of a tribal liaison at MTDLI. This addition is part of the state's goal of more effectively engaging tribal populations in the state's workforce systems. Impact will be assessed based on feedback from tribal stakeholders. Any specific programmatic impact will be conducted by the DO Bureau using available program, labor market, and wage data.

C. STATE STRATEGY

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

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

Montana will implement a set of coordinated strategies under the 406 JOBS framework that use local, employer-led sector partnerships and career pathways, including registered apprenticeship, to meet in-demand hiring, education, and skills needs across the state. Economic and workforce system analyses have identified worker supply constraints as a critical factor to address, leading to strategies that promote labor force engagement to increase workers supply and that better coordinate training and upskilling activities to be in-line with industry demand.

A central strategy and a specific initiative in the 406 JOBS Year One Workplan is to establish and scale local sector partnerships in each of the high-demand sectors, organized regionally and led by employers. The workplan directs the State Workforce Innovation Board (SWIB) to support the formation of employer-led partnerships in all 12 Montana Association of Counties regions, with a goal of creating 40 local sector partnerships statewide that each identify 3 to 5 priority occupations and develop sector strategies to address local shortages. Each partnership will include employers, organized labor or employee representatives, education and training providers, and supportive-services experts, and will be facilitated by a trained workforce intermediary who helps define sector priorities, align services, and communicate needs back to SWIB.

Local sector partnerships are embedded throughout the workplan as a cross-cutting mechanism rather than a stand-alone effort. They are explicitly tasked with using DLI data and employer input to pinpoint critical occupations and skill gaps in each region and sector, with designing and testing sector strategies such as work-based learning, upskilling of incumbent workers, and targeted recruitment of under-represented groups, and with developing public-private funding models that incorporate private sector investment in the implementation of sector strategies.

Career pathways in 406 JOBS are built around the "4 pathways to work" concept which include college, career, military, and entrepreneurship, while positioning registered apprenticeship as a core direct-to-career pathway in several sectors. The Year One workplan identifies expanding the Montana Registered Apprenticeship Program (MRAP) as a priority, including growth in Registered Apprenticeship and pre-apprenticeship opportunities tied to sector needs. The apprenticeship model inherently creates pathways towards industry demanded skills and credentials. Additionally, the workplan calls for actions such as creating and maintaining a statewide credential database that helps clarify what credentials are industry-recognized and demanded by employers and issuing sector reports in each high-demand sector to provide actionable data on workforce gaps, projected openings, and wage outcomes to guide sector partnership decision-making and program design.

Throughout implementation, local sector partnerships are encouraged to treat apprenticeship as a key strategy, using it to build regional talent pipelines. Specific Year One outcomes include increasing pre-apprenticeship participation by 50% and Registered Apprenticeship participation

by 20%, engaging more employers with MRAP, and having sector partnerships actively explore and identify apprenticeship and pre-apprenticeship models suitable for their local labor markets.gov.

Finally, the workplan embeds sector partnerships in a data-driven, continuous-improvement approach to reinforce accountability. SWIB, MTDLI and other core partners will use metrics, such as number of partnerships formed, priority occupations identified, apprenticeships launched, and private dollars invested, to track progress and refine strategies in collaboration with local partners. Together, these strategies ensure that industry and sector partnerships, registered apprenticeship, and career pathways are not isolated activities, but the primary vehicles through which Montana aligns its workforce system with in-demand industry sectors and occupations under the 406 JOBS framework.

The 406 JOBS workplan also incorporates strategies to develop population specific strategies for improving service delivery and opening career pathways for groups identified as having barriers or specific needs in the workplan. This includes veterans, individuals reentering the labor market following incarceration, and workers with disabilities.

Veterans are a key population identified within Montana's workforce. The plan calls for strengthening coordination between veteran serving organizations and emphasizes improving services and supporting identification of strategies to support veteran success in specific occupations, including addressing barriers and labor market frictions around transitions out of active duty.

Reentry and second-chance hiring are another core strategy to grow the labor force and meet employer demand. The workplan directs state agencies and partners to align workforce, corrections, and human services efforts so that former offenders can access services and work preparedness activities pre- and post-release. Strategies include expanding access to training aligned with in-demand occupations while individuals are still in custody, improving continuity of services upon release, and promoting employer education and incentives around second-chance hiring to reduce recidivism and fill chronic vacancies in key sectors. MTDLI's new Office of Reentry is spearheading efforts to organize and coordinate these activities, define new referral processes between incarceration and workforce services providers, and ensure effective services are provided to this population.

Another key strategy for expanding labor supply is better connecting Montanans with disabilities to in-demand jobs. Vocational Rehabilitation (VR) services are leveraged to provide individualized counseling, career planning, assistive technology, and job placement support. The workplan emphasizes coordinating VR with other workforce and education initiatives, such as apprenticeship, and improving cross WIOA program participation so that participants can build skills while receiving accommodations and supports tailored to their needs. By embedding VR program components into broader 406 JOBS efforts, the state aims to turn a sizeable non-working population with disabilities into a source of skilled workers for employers, while advancing its 'zero barriers to employment' goal.

Recognizing the growing impact of artificial intelligence, one final key strategy is a commitment to build AI literacy and AI-related skills trainings into Montana's workforce system, particularly

within K-12 environments both as tools for educators and preparation for students. The plan supports integrating AI skills and literacy training and credentialing within existing programs so workers can use AI for productivity and build preparedness and resiliency for future AI-related job changes. Montana's strategy also encourages state agencies to lead the way by adopting AI standards to protect consumer and client data while also improving operational efficiency through the use of these technologies.

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)

Alignment between Montana's core programs will be coordinated at the highest level by the SWIB and through the 406 JOBS year one workplan. The activities included in the year one workplan contain initiatives and activities for core partner agencies to engage in, which include a number of goals to strengthen coordination and cooperation across the core partners and identify efficiencies in program service delivery through activities like improved referral connections and coordinated service delivery to target populations.

In 2025, through legislative action and order of the Governor, Adult Education (WIOA Title II) program administration and oversight was transferred from OPI to MTDLI. This strategic realignment brings Adult Education operations into the same agency that administers WIOA Titles I and III, SCSEP, and JVSG programs, directly supporting Montana's submission of a combined WIOA-Perkins plan and closely mirroring federal interagency coordination approaches reflected in USEd-USDOL agreements. Consolidating Adult Education within MTDLI enables seamless coordination of policy, eligibility standards, co-enrollment, and service delivery across core programs. This transition supports America's Talent Strategy's Integrated Systems pillar by cutting down on fragmentation, better connecting education and workforce efforts, and making it easier for adults with low literacy or limited English proficiency to get workforce training, Registered Apprenticeship opportunities, and employment services through one coordinated system.

Montana continues regular meetings between WIOA partners (including AE, VRBS, JVSG, and other workforce programs), to improve collaboration between programs and encourage warm handoffs between workforce providers. This includes key state level administrators who participate in quarterly alignment convenings all the way down to local core partners across the state who share clients. In addition, MTDLI intends to continue efforts to house WIOA partners within JSM locations to share building costs with more programs, reduce administrative costs, and provide streamlined services. Finally, MTDLI staff are examining policies to reduce barriers to program participation and eliminate unnecessary restrictions that prohibit co-enrollment of clients. Co-enrollment provides better service to the client while sharing staffing costs over more programs.

Montana has developed a new case management system, EmployMT, that more efficiently supports program operation across a number of WIOA programs. The EmployMT system currently supports operation of Adult, Dislocated Worker, NDWG, Youth, JVSG, and Wagner-Peyser programs and non-WIOA workforce efforts such as the HELP-Link program, and was designed in a manner to allow for continued integration of additional programs. For example, after initial launch the EmployMT system was enhanced to incorporate a public portal through which job seekers can engage with WIOA case managers and a second public portal through which training providers can apply for and manage their ETPL applications and records. Future efforts being considered include bringing Montana Registered Apprenticeship Program activities into EmployMT. These efforts to grow and expand the EmployMT platform and create a unified system for program operation contribute to a statewide environment where job seekers and businesses can access support through any program with ease, through simple coordination across programs. EmployMT strengthens relationships between WIOA partners through the facilitation of data sharing, enabling co-enrollment, and providing a better platform for data analytics so that providers can better understand the performance outcomes for their clients.

III. OPERATIONAL PLANNING ELEMENTS

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

A. STATE STRATEGY IMPLEMENTATION

The Unified or Combined State Plan must include—

1. STATE BOARD FUNCTIONS

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

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

The SWIB board's chair is appointed by the Governor, and the board works through a committee structure designed by the board chair in consultation with staff. Committees include the Executive Committee, the WIOA Committee, and the 406 JOBS Committee. All three committees work on policy, WIOA implementation, and the strategic vision for the role of the public workforce and education and training system in Montana.

In addition, the board oversees the State Apprenticeship Advisory Council as an ad hoc committee. The role of the State Apprenticeship Advisory Council is to advise the state's registered

apprenticeship program on best practices and help the program meet its goals for registered apprenticeship. The board also assembles ad hoc committees to work on topic-specific issue recommendations from the governor and established priorities of the SWIB. Additional current projects of the SWIB board include the labor force engagement and training of those with criminal backgrounds through oversight of the PROWD grant and engagement with business and education partners for the state's Tech Hub application.

In preparation for the state plan, the SWIB sponsored stakeholder engagement efforts, meeting with local government officials, tribal representatives, and businesses throughout Montana. Stakeholder engagement was conducted in the rural communities of Glasgow, Miles City, and Havre; the urban areas of Billings and Butte; and tribal areas in Havre, Browning, and on the Flathead Reservation. Locations were selected to ensure geographic representation and demographic diversity. Stakeholder engagement also included focus groups with current JSM and non-state WIOA providers to solicit feedback on improving WIOA service delivery, partnerships, and to discuss opportunities for innovation.

The board conducts four quarterly meetings per year, with in-person meetings typically taking place in the spring and fall and remote meetings in the summer and winter. Additional meetings are arranged by the chair in consultation with the SWIB Director and MTDLI's Commissioner. Committee and task force meetings use electronic communication. Meeting notes are posted on the SWIB website at swib.mt.gov.

The SWIB functions under section 101(d) of WIOA in following ways:

- Making policy recommendations to the Governor related to the establishment and maintenance of an efficient, integrated, statewide workforce development system to train the maximum number of unemployed and underemployed Montanans 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
- Coordinating with organizations to support local, business engaged, innovative workforce programs.
- The SWIB is organized in the following ways to ensure it meets its priorities:
 - Executive Committee:
 - The Executive Committee shall be composed of a majority of business members, but shall include the Governor or the Governor’s designee, and the Commissioner of MTDLI or the Commissioner’s designee. This Committee may also include the cabinet officers from other relevant state departments responsible for workforce development initiatives.
 - When an urgent matter demands immediate action and it is impractical to call a special meeting of the SWIB, the Executive Committee shall have the authority of the SWIB to take action. Such action must be ratified by the SWIB at its next meeting.
 - Duties include, but are not limited to, overseeing the implementation of the strategic plan; 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:
 - The WIOA Committee is composed of a majority of business members and will include the Commissioner of MTDLI or the Commissioner’s designee, the Superintendent of Public Instruction or the Superintendent’s designee, and the Administrator of the Disability, Employment, and Transitions Division of the Department of Public Health and Human Services.
 - The WIOA Committee is responsible for understanding and making recommendations to the SWIB for implementation of WIOA rules and regulations; administering the state’s One-Stop Certification process; and coordinating and implementing the state plan and necessary modifications.
 - 406 JOBS Committee:
 - The 406 JOBS Committee will guide the state’s broad strategies to modernize Montana’s workforce system through 4 pathways to work, 0 barriers to employment, and 6 high demand industries. The committee will support equitable pathway opportunities for Montanans, focus on statewide policy to tear down obstacles that keep people out of the workforce, develop talent pipelines that are industry-led and community driven through sector

partnerships, and broaden system coordination, communication, and effectiveness.

2. IMPLEMENTATION OF STATE STRATEGY

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

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

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

The state of Montana recognizes that coordination across partners is critical in the implementation of a fully integrated public workforce and talent development system. Statewide leadership, guidance, and collaboration established the foundation Montana's implementation through the 406 JOBS Initiative. The 406 JOBS Initiative guides key activities and goals within each of the core programs. Montana intends to build on that foundation by implementing and refining the following strategies:

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

DATA ALIGNMENT:

All core programs use labor market information (LMI) to serve clients and ensure that training and career development strategies are aligned to industry needs in the area. The common use of LMI to serve businesses and individuals in Montana's workforce system allows for seamless service delivery across programs to help individuals access training or employment and develop talent to support business and economic growth. MTDLI will continue to build and enhance data dashboards to support the use of LMI and program data to improve service delivery and coordination between core partners.

Additionally, the 406 JOBS year one workplan established 46 metrics to track progress partners are making towards the 12 priority initiatives within the plan. These measurable goals include things like the total number of apprentices and pre-apprentices, the creation of new apprenticeship and pre-apprenticeship pathways, the number of AI trainings delivered, measures of business satisfaction, and other targets for program success and business satisfaction. Through the shared use of accountability metrics within the workplan, the WIOA core partners will be able to observe progress and easily identify areas where further alignment and collaboration across core programs is necessary.

CROSS TRAINING ACROSS PARTNERS:

Montana will provide training opportunities at the state and local level for partners to learn about other partners' programs, working together to best serve clients. In addition, improved understanding of core programs will allow partners to establish common goals and strengthen relationships to meet regional economic needs. In 2023, local core partner meetings laid the groundwork for stronger partnerships, focusing on improving referral processes between core partners. Montana will continue this practice including conducting training on JVSG to expand co-enrollment opportunities for titles II and IV partners who may be unfamiliar with the program's intent and eligibility. Leadership teams across the core programs are also continuing to meet to coordinate delivery of services. One example includes current efforts to pilot the addition of computer kiosks in core partner offices that provide access to information on titles I-IV programs and other resources including JVSG, state programs such as an Incumbent Worker Training (IWT) and HELP-Link (a state workforce program for Medicaid recipients), job board tools, and local wraparound support resources.

COORDINATED AND STRATEGIC BUSINESS ENGAGEMENT:

Montana will grow its statewide business engagement strategy by coordinating across partners at the regional level to meet business challenges and safeguard economic growth. By tracking business services through an integrated case management system and using LMI to understand state and regional economies, Montana will work on the following:

- Grow sector strategies and partnerships at the state and local level to identify skills, credentials, and education required for occupations within sectors; and
- Work collaboratively to identify education and training partners and develop the skills and training necessary to succeed in the workforce.
- Develop strategies to address local shortages.

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.

Montana is submitting a combined WIOA-Perkins plan for PYs 2024-2027 that treats workforce development, career and technical education, and postsecondary education as one integrated talent system rather than separate programmatic silos, with ongoing implementation and deepening integration efforts continuing through 2028 and beyond.

To support this direction, the state is implementing Montana House Bill 823 (2025), which specifies that any new or revised 4-year Perkins plan must be written to coordinate with or be included in the federal WIOA Combined State Plan. OCHE and OPI serve as the lead entities for all Perkins-

related planning, strategy, and decision-making, engaging the State Workforce Innovation Board (SWIB) as a key partner to ensure alignment with the state’s workforce development system. This work is further informed and supported by the Perkins Advisory Committee, which provides ongoing stakeholder input and guidance.

Consistent with this vision, Montana is expanding Registered Apprenticeship and pre-apprenticeship under the 406 JOBS framework, including a major teacher apprenticeship expansion grant in roughly 40 school districts, positioning grow-your-own educator pipelines as a core strategy to address teacher and childcare shortages while deepening coordination between K–12 CTE, postsecondary partners, and WIOA one-stop services.

These learning efforts are tightly aligned with one-stop partners and sector strategies: local Job Service offices, WIOA Title I–III programs, VRBS, TANF/SNAP E&T, and education partners collaborate through sector partnerships and the 406 JOBS workplan to design earn-and-learn pathways in high-demand sectors, co-enroll participants, braid funding, and avoid duplicative training efforts by using shared labor market information and common performance metrics.

Montana’s 2025 STARS Act implementation, including launch of the statewide credential registry in December 2025, further advances alignment with Perkins and one-stop partners by identifying industry-recognized credentials and work-based learning experiences that qualify for Future Ready payments, and the state is planning next-generation technology integration that links the registry to the Eligible Training Provider List, LMI dashboards, career exploration tools, and the state job board so that students, job seekers, and employers experience a single, coherent digital ecosystem for credentials, programs, and jobs.

Within this ecosystem, WIOA core and partner programs will use the credential registry and related tools to co-design career pathways, guide training investments toward in-demand, high-value credentials, and reduce duplication by steering participants and providers away from low-value or overlapping offerings, while sector partnerships and SWIB oversight ensure that Perkins CTE programs and WIOA-funded training stay coordinated.

Finally, Montana is aligning workforce and human services programs through its Medicaid community engagement verification work: MTDLI and DPHHS are jointly building data linkages so that, beginning in summer 2026, Medicaid can rely on MTDLI’s EmployMT and data warehouse to verify hours in allowable workforce and education activities (WIOA Title I and III services, Registered Apprenticeship, occupational training, and related programs), ensuring that community engagement requirements reinforce, rather than duplicate or conflict with, the activities offered through Job Service offices, one-stop partners, and education and training providers.

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services (e.g. transportation), to individuals, including those

populations identified in section II(a)(1)(B), and individuals in remote areas. The activities described shall conform to the statutory requirements of each program.

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

Given Montana's small population and limited resources, it is necessary to coordinate services across partners to effectively serve all Montanans interacting with the public workforce system. JSM offices, community-based organizations, Adult Education, VRBS, JVSG, and SCSEP program administrators are working at the state and local level to develop best practices and identify opportunities to continue aligning on workforce challenges. In addition, TANF and SNAP programs partner with the workforce system to holistically serve clients enrolled in those programs and Montana's new provider for these services will be renting space in JSM offices to streamline service delivery.

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

- Participate in community-based initiatives and groups, including established community management teams, designed to collaborate and align public services to better serve customers;
- Participate in and collaborate on cross training across partners to deepen understanding of partner programs and how they serve clients; and
- Seek opportunities to strengthen local partnerships with education, industry, economic development, local government, and other stakeholders to ensure services offered through the One-Stop system are meeting the local workforce needs. July 1, 2025, MTDLI began oversight of WIOA Title II, Adult Education within the state. The move was in part to assist with alignment of co-enrollment into WIOA programs, braiding funding as well as meeting workforce training needs.
- Reshape and refocuses how Montana approaches education and workforce development, in collaboration with OPI, OCHE, MUS and the Department of Commerce through the 406 JOBS Work Plan.

As stated above, in addition to coordination across WIOA partners, Montana continues to align and coordinate workforce development with the state's secondary and post-secondary education systems. Programmatic alignment is required under both WIOA and Perkins and all WIOA core partners and additional partner agencies worked together to align the programs under the Perkins and WIOA umbrellas. In addition to programmatic alignment, the agencies are working together to promote and engage broad stakeholders in cultivating a better understanding of CTE and WBL.

D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

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

Montana's WIOA core programs, Combined State Plan partners, and required and optional one-stop partners coordinate their activities and resources for employers through the 406 JOBS framework, which organizes all partners around an industry-driven strategy focused on four pathways to work, zero barriers to employment, and six high-demand sectors.

Under 406 JOBS, the State Workforce Innovation Board (SWIB) serves as the central convener for employer engagement and sector work, using statewide and regional, employer-led sector partnerships to identify priority occupations, required skills and credentials, and shared strategies—such as Registered Apprenticeship, pre-apprenticeship, short-term training, and incumbent worker upskilling—that align WIOA Titles I–IV, Perkins CTE, TANF and SNAP E&T, VRBS, Adult Education, JVSG, SCSEP, tribal WIOA programs, and other partner programs with the current and projected needs of industry.

To deliver comprehensive, high-quality services that conform to each program's statutory requirements, core and partner programs use MTDLI's business engagement team as the primary front door for employers, coordinating customized recruitment, job posting and matching, labor market information, and training solutions for each program.

Shared infrastructure further supports this coordination: linked data systems and strategic data sharing agreements allow partners to coordinate employer interactions, align outreach, and avoid duplication; common use of labor market data and joint analyses (such as the Postsecondary Workforce Report and 406 JOBS sector briefs) help partners target services to in-demand occupations; and co-location of staff and braided funding enable unified service to employers while maintaining program-specific eligibility, reporting, and performance requirements.

Centralizing strategy and coordinating through the 406 JOBS Year One Workplan further supports coordination, with 12 initiatives that connect WIOA core and other partners across the workforce system to work together in support of both employers and job seekers under a unified strategy, with shared goals, clear deliverables, and activities driving the state toward them.

Through these mechanisms, employers experience a single, integrated talent development system in which SWIB and sector partnerships set industry-informed priorities, core and partner programs contribute complementary services, and coordinated investments in training and supportive services help businesses meet immediate hiring needs and longer-term sector goals.

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

Describe how the State's Strategies will engage the State's community colleges, adult education providers, area career and technical education schools, providers on the State's eligible training

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

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

- Perkins V and the integration of LMI as a tool to develop curriculum within CTE programs at both the secondary and post-secondary level;
- Curriculum development for technical apprenticeships coordinated between MRAP, employers, and two-year or community colleges;
- Collaboration among OCHE and MTDLI to engage individuals who started, but did not complete, a degree program through the higher education system and help those individuals obtain a degree or credential;
- Collaboration between Adult Education and two-year and community colleges to develop pathways for adult learners;
- Adult education programs, under the purview of MTDLI, will continue to develop non-credit educational IET opportunities for the in-demand sectors identified in the 406 JOBS Initiative that result in industry-recognized credentials, certification and/or exam passage.
- Collaboration among WIOA core partners, OCHE, and industry representatives to navigate the current landscape of certifications across the state and ensure that training is provided, and certificates issued through MUS or other training providers are relevant to industry; and
- Development of meaningful WBL opportunities for secondary and post-secondary students.

Leadership within the public workforce system, the university system, and K-12 schools are committed to serving all Montanans. Montana's executive and legislative leadership have also signaled support of this through passage of legislation that mandates WIOA/Perkins alignment and by transitioning WIOA Title II to the Workforce agency for stronger partnership.

F. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

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

OCHE and the SWIB collaborated to increase WIOA Youth program opportunities. USDOL approval of two waivers allows for greater program flexibility for eligible participants (aged 16-19). The first waiver allows MTDLI to grant youth providers funding flexibility, balancing the amount of funding between in-school and out-of-school youth.

The second waiver permits the use of WIOA youth funding for in-school youth’s dual credit courses. If a student utilizes the One-Two-Free program and exhausts that program’s 2-year or community college benefit, they can access WIOA Youth funding to pay for additional courses and/or supportive services. For eligible students who may not have access to the One-Two-Free program, including tribally affiliated students, they can access WIOA Youth funding for dual credit first. The program’s priorities are to increase access to the One-Two-Free program and gain WIOA Youth funding flexibility for Montana students.

New in 2026, in alignment with America’s Talent Strategy Pillars, growing apprenticeships is a priority initiative as it ensures direct-to-career pathways for employment are readily available across the state. Providing ways for workers to access training in their local communities, achieve a recognized credential, and earn a living while training helps to reduce barriers to employment. Expanding pre-apprenticeship programs in high schools helps to prepare students for success when entering the workforce and youth apprenticeships can reach young people facing barriers to employment in new ways. Throughout the implementation of 406 JOBS, local sector partnerships are encouraged to consider apprenticeship as a sector strategy for local talent development, including pre- and youth apprenticeships. Reducing barriers to apprenticeships, including lack of employer awareness, occupational licensing restriction, and incentives for apprentice mentors are a priority.

G. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES

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

Economic development agencies are integral partners in Montana’s local sector partnerships under the 406 JOBS framework, helping align workforce strategies with regional growth and business attraction efforts. The 406 JOBS Initiative explicitly calls for coordination “in partnership with industry, labor, education and training, and economic development partners,” ensuring that entities such as the Department of Commerce, local and regional economic development organizations, and business alliances participate alongside employers and training providers in designing sector strategies. By engaging these agencies in local sector partnerships, Montana can better synchronize talent pipeline development with economic development priorities. These activities can include supporting expansion of existing firms, recruiting new employers, and leveraging initiatives like the Headwaters tech hub so that workforce investments reinforce broader regional competitiveness.

B. STATE OPERATING SYSTEMS AND POLICIES

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

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

Montana's operating systems and policies help support the implementation of the State's strategy. The system includes labor market information, data systems, case management tools, and referral systems. Modernizing the state's case management system has been a priority of the Gianforte Administration.

Labor market information for Montana is hosted by MTDLI at <http://lmi.mt.gov>. The site utilizes business intelligence tools and hosts a range of dashboards, datasets, and labor market publications. Source data from the site comes from the Workforce Information Database and is supported by the Workforce Information Grants for States (WIGS) 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.

Career coaching and development in the state is offered through The Montana Career Information System (MCIS). Within MCIS, clients can access career assessments, state and national occupational, education and training information. Data supporting this program comes from the labor market data produced within the DO Bureau, including OEWS, long-term industry and occupational projections, and the U.S. Department of Labor's O*Net database. Within MCIS, job seekers can create an e-portfolio which can include assessment results, occupational and education research, resumes, and other career planning activities. MCIS enables sharing across core partners to access the portfolio contents for shared clients, resulting in a seamless delivery of career services across programs.

WIOA programs under Titles I and III currently collect client intake and program activity data, including any information required for reporting, using the EmployMT system. The EmployMT system was developed by MTDLI and was launched in August 2024. EmployMT streamlines workflows for program providers, unifying intake processes and streamlining eligibility determination across the programs. This new system facilitates referrals across programs and coordination between providers of the programs. Additionally, the EmployMT system was designed with the PIRL reporting process in mind, and accounts for all data collection and reporting requirements, facilitating improved opportunity for real-time analyses of program activity and performance. MTDLI is exploring development of registered apprenticeship program processes within the EmployMT system in order to further align programs within the system. WIOA programs under Title II collect client data using the LACES system and data under Title IV is collected using the WellSky system referred to as Madison. Currently, client data is tracked individually by system. Any performance reporting unique to a specific program are handled within that program's relevant system.

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

WIOA Title I, II, and III policies and guidance regarding the operation and service delivery keeping with state and federal laws and regulations here: <https://wsd.dli.mt.gov/wsd-policy>.

WIOA Title IV maintains guidance on WIOA as it pertains to VRBS programs here: [Vocational](#)

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

Montana's One-Stop partners, in conjunction with SWIB, develop guidance for the One-Stop partner program's contributions to the One-Stop delivery system based on guidance received from USDOL.

Guidelines are found in the state's One-Stop System Policy and the Infrastructure Funding Agreement is reviewed annually with each partner as part of the process for renewing the required Memorandum of Understanding (MOU)The One Stop System Policy can directly be found at: https://wsd.dli.mt.gov/_docs/wsd-policy/one-stop-system-policy-.pdf Updates were most recently completed in 2020 and became effective on July 1, 2020.

Veterans and eligible persons receive employment, training, and job placement services at all Job Service Montana locations. Veterans and eligible spouses (or covered persons) receive priority of service and are required to fill out a Veteran Screening Tool. The form is located at the front counter at all Job Service Montana locations. Staff have been trained to request completion of the screening tool to determine eligibility prior to referral to the DVOP. Once eligibility is determined, the veteran will either be referred to a DVOP or will be assisted by AJC staff. Veterans not eligible for DVOP services still receive priority of service and AJC staff will determine eligibility for any Wagner-Peyser programs. Additionally, these veterans receive assistance with resume writing, mock interviews and help with job searching. Veterans and eligible spouses (or covered persons) receive priority of service over non-veterans when it comes to receiving employment, training, and job placement services. [Veteran Services](#)

3. STATE PROGRAM AND STATE BOARD OVERVIEW

A. STATE AGENCY ORGANIZATION

Describe the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.

MTDLI's Workforce Services Division (WSD) administers WIOA Titles I, II, and III, as well as the following:

- Trade Adjustment Assistance;
- Work Opportunity Tax Credit;
- Montana Registered Apprenticeship Program;
- State Displaced Homemaker;
- Foreign Labor and Migrant and Seasonal Farmworker;

- Senior Community Services Employment Program (SCSEP);
- Federal Bonding;
- Montana’s Incumbent Worker Training Program;
- Jobs for Montana’s Graduates;
- Reemployment Services and Eligibility Assessment (RESEA);
- Medicaid Expansion Workforce Program (HELP Link);
- Labor Market Information;
- Jobs for Veterans State Grant Program (JVSG);
- The Job Service Bureau;
- The Business Engagement and Education Bureau;
- State Approving Agency (for GI Bill);
- The Office of Reentry
- Partners for Reentry in Workforce Development (PROWD) Program, and
- Rural Health Transformation Program (RHTP) workforce programs.

Montana’s Unemployment Insurance Division is housed at MTDLI and coordinates clients with the state’s public workforce partners to help individuals transition into employment or training.

MTDLI coordinates delivery of workforce development services in local communities with guidance from the SWIB.

The organizational chart for MTDLI can be found at:

https://directory.mt.gov/docs/26_OrgChart_FebWk1_Main.pdf

The organizational chart for MTDLI’s Workforce Services Division (WSD) can be found at: <https://swib.mt.gov/board-member-resources/>

VRBS programs are housed at the Montana Department of Public Health and Human Services (DPHHS). The VRBS administrator is on the SWIB and provides programmatic updates to the board. DPHHS is also a signatory partner for the state’s One-Stop Delivery System’s Memorandum of Understanding and Consortium Agreement, supporting the state’s one-stop system. As a workforce partner in the coordination of services and programs, VRBS provides training and contributes their expertise to ensure all customers are served effectively. WIOA Title IV programs use the WellSky system to implement and track programs and services. The organizational chart for DPHHS and VRBS is found at: <https://dphhs.mt.gov/assets/dphhsorganizationalchart.pdf>.

B. STATE BOARD

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

In the fall of 2022, the SWIB began a process of determining meaningful board and committee goals. SWIB, core program, and partner activities assisted with the achievement or near-achievement of many of the following:

- Support the offering of short-term credentials with braided funding for students;
- Build and support pipelines for students to utilize work-based learning;
- Support partnerships with private industry to engage industry employer support and assist with resolution of workforce shortages;
- Provide support and connections with CTSO teachers;
- Develop an analysis survey or utilize existing tools and data for business partners;
- Support WIOA policy and administrative compliance;
- Support and focus on streamlining communications and challenges related to licensing reciprocity;
- Support the Governor’s Red Tape Task Force recommendations related to workforce issues;
- Coordinate and provide resource support for the Governor’s legislative workforce priorities; and
- Support business and economic development activities of MTDLI, the Montana Department of Commerce, and the Montana Chamber of Commerce.

Greg Gianforte Governor Designee: Rachel Green	Governor Montana Office of the Governor PO Box 200801; Helena, MT 59620-0801	Term Expires: January 2, 2029
Adam Gilbertson Chair Business Representative	Senior Vice President RDO Equipment Company 5221 Midland Road Billings, MT 59101	Term Expires: July 1, 2027
Kerri Seekins-Crowe Legislative Representative	State Representative Montana House of Representatives 480 Pinon Drive; Billings, MT 59105-2742	Term Expires: January 1, 2027

Mark Noland Legislative Representative	State Senator Montana Senate PO Box 1852; Big Fork, MT 59911-1852	Term Expires: January 1, 2027
Susie Hedalen State Education Agency	Superintendent Montana Office of Public Instruction PO Box 202501; Helena, MT 59620	Term Expires: July 1, 2028
Sarah Swanson Core Partner (Titles I, II, and III)	Commissioner Montana Department of Labor & Industry PO Box 1728; Helena, MT 59624-1728	Term Expires: July 1, 2027
Chanda Hermanson Core Partner (Title IV)	Disability Employment & Transitions Division Administrator Department of Public Health & Human Services PO Box 4210; Helena, MT 59604	Term Expires: July 1, 2026
Eric Hinebauch Local Elected Official	County Commissioner Cascade County, Montana P.O. Box 237, Great Falls, MT	Term Expires: July 1, 2028
John Williams Local Elected Officer	Mayor Colstrip, MT 59323	Term Expires: July 1, 2027
Paul Hopfauf Business Representative	Director of Corporate Strategy Montana Dakota Utilities 318 Sunset Ave, Glendive, MT 59330	Term Expires: July 1, 2027
Aaron Kellum Business Representative	President Felco Industries 6600 US WHY 10, W Missoula, MT 95808	Term Expires: July 1, 2028
Jason Yager Business Representative	Director Montana Phototonics & Quantum Alliance	Term Expires: July 1, 2027

Sara Schreiner Business Representative	President Sunshine Academy 1326 Nez Perc Dr, Laural MT 59044	Term Expires: July 1, 2026
Dwaine Iverson Business Representative	Owner/President Certified Public Accountant 301 1 st St South, Shelby, MT 59474	Term Expires: July 1, 2028
Paddy Fleming Business Representative	Executive Director Montana Manufacturing Extension Center 2310 University Way Building 2, Suite 1; Bozeman, MT 59717	Term Expires: July 1, 2027
Heather O'Hara Vice Chair Business Representative	Vice President Montana Hospital Association 2625 Winne Avenue; Helena, MT 59601	Term Expires: July 1, 2026
David Smith Business Representative	Executive Director Montana Contractors' Association 1717 11th Avenue; Helena, MT 59601	Term Expires: July 1, 2026
Quinton Queer Workforce Member	President Plumbers, Local 41 45 E Silver Street; Butte, MT 59701	Term Expires: July 1, 2026
Jim Wonnacott Workforce Member	President/Apprenticeship & Training Coordinator Ironworkers Local 732 2 Oak Avenue; East Helena, MT 59635	Term Expires: July 1, 2026

4. ASSESSMENT AND EVALUATION OF PROGRAMS AND ONE-STOP PROGRAM PARTNERS

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

Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. This State assessment must include the quality, effectiveness,

and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.

MTDLI is in the process of instituting business intelligence tools that will allow the state to effectively assess performance for service providers operating WIOA Titles I, III, and partner programs. These tools will incorporate visualizations of quarterly performance results as reported by Montana through WIPS as well as proactive real-time data on program participation. This approach allows for proactive monitoring of statewide performance in comparison to negotiated targets as well as real time assessment of performance and identification of areas where targeted improvement is needed. MTDLI uses a data warehouse to house data from the EmployMT system and produce data dashboards which provide real time data on participants, so that it can better assess trends and proactively make decisions to improve performance outcomes for program participants. MTDLI employs a Performance Analyst and Business Intelligence Analyst within the Data and Operations Bureau who produce data products for the purposes of assessing performance and quality assurance, while also working with program operators so provide technical assistance related to performance data findings.

WIOA Adult Education providers engage in continuous improvement activities and goal setting and are monitored via desk audits and monthly reports. Monthly report submissions are mandatory for all programs, and regularly scheduled desk audits ensure that data is accurate and that programs satisfy grant requirements. Desk audits also help programs maintain compliance with federal and state rules and allow the state to find areas of deficit within individual programs. The state has implemented and published a monitoring calendar. WIOA Adult Education providers are encouraged to regularly and routinely self-monitor to ensure compliance with policies. State staff continually analyze data and provide technical assistance to local programs after monthly desk audits of program data and performance or as needed on a case-by-case basis.

Montana VRBS uses and analyzes data from its own case management and data system on WellSky platform, and referred to as Madison, to assess its performance on all of the State's performance accountability measures. The agency also conducts quarterly case reviews to assess individual counselor performance and inform the agency's comprehensive system of personnel development. The data dashboards provided by the Rehabilitation Services Administration are analyzed quarterly and reviewed with all levels of staff so there is agency wide understanding of what is currently reflected and how their individual effort impacts the statewide WIOA system.

B. PREVIOUS ASSESSMENT RESULTS

The launch of EmployMT made it possible to access data about performance and participant success at the individual provider level.

MTDLI has worked extensively on performance accountability pertaining to all Core programs. The work aligns with Pillar IV: Accountability: Ensuring federally funded workforce program deliver measurable results by linking investments to outcomes and enforcing performance discipline of the America's Talent Strategy: Building the Workforce for the Golden Age.

The indicators of performance measure and evaluate the effectiveness of individual programs and the State's workforce development system. These indicators are well aligned with the goals described throughout the State Plan and the 406 JOBS framework to allow our programs to measure how well they are serving participants and employers. Progress toward these indicators is evaluated against the performance targets negotiated by each program with their applicable federal agencies.

During Program Year 2024, MTDLI conducted technical assistance trainings pertaining to the performance indicators. Each quarter performance reports are analyzed by program staff and shared with providers that deliver the Core Programs. If any deficiencies are identified, changes are made to make sure the services are delivered appropriately and to make sure a return on investment is met on the federal funds spent.

In doing this, it was found that some providers needed in-depth technical assistance on the measures being used to gauge performance, particularly MSGs and credential attainment. MTDLI worked with providers to better inform on when and how to log performance, as well as the importance of strong results. Provided technical assistance on using the new EmployMT system. Performance improved among the youth providers. The other Core programs continue to meet and exceed performance indicators.

C. EVALUATION

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

MTDLI conducts evaluations of WIOA activities by leveraging the research capabilities of economists, data analysts, and performance reporting analysts in the DO Bureau and third-party researchers. MTDLI will continue to leverage the resources available in the DO Bureau to produce data explaining the work and impacts of MTDLI's WIOA efforts. As needed, third-party researchers will be used to provide further support and expertise in evaluation efforts.

Like the computation of performance reporting metrics, administrative data collected during WIOA activities and UI wage data will be combined for evaluations of program implementation and the impacts of activities on employment and wage outcomes. DO Bureau economists have the access and ability to use the administrative and UI data. The information produced under these evaluations will be used to guide overarching policy choices and be made available to program operators for immediate use in continuous improvement activities. Presentation of evaluation findings, reports, and creation of interactive data dashboards will be the methods through which information is presented to program operators.

Past and ongoing evaluations by the DO Bureau include:

- a) WIOA participant outcomes and program costs by different program operators

https://lmi.mt.gov/_docs/Publications/LMI-Pubs/Special-Reports-and-Studies/WIOA-Paper-2016.pdf

Results were used to conduct technical assistance with underperforming operators and develop performance accountability practices.

b) Analyses of program participation and outcomes for a state-specific jobs programs designed for Medicaid enrollees

https://lmi.mt.gov/_docs/Publications/LMI-Pubs/Special-Reports-and-Studies/HELP-Link_2019Report.pdf

c) Montana Registered Apprenticeship Program outcomes

https://lmi.mt.gov/_docs/Publications/LMI-Pubs/Special-Reports-and-Studies/24_ApprenticeshipReport_Final.pdf

d) In-depth evaluation of the state of training programs at Montana postsecondary institutions, with supply and demand as well as outcomes analyses for each postsecondary program. https://lmi.mt.gov/_docs/Publications/LMI-Pubs/Special-Reports-Studies/MTCollegeReport2022.pdf

Results were used to guide strategic planning in Montana's two and four-year colleges and made available to prospective students.

e) DO Bureau partnership with the Minneapolis Federal Reserve Bank to conduct an impact evaluation of service delivery strategies used in the RESEA program.

<https://www.minneapolisfed.org/research/community-development-working-papers/final-report-for-the-enhanced-services-pilot-of-the-montana-reemployment-services-and-eligibility-assessment-program>

f) Analysis of the CARE in MT ARPA workforce programs

https://lmi.mt.gov/_docs/Publications/LMI-Pubs/Special-Reports-and-Studies/CARE-in-Montana-Outcomes.pdf

5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

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

A. FOR TITLE I PROGRAMS

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

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

Funding distribution for all Title I programs is outlined in the WIOA Funding Allocation policy, established by the SWIB, and located at: <https://wsd.dli.mt.gov/wsd-policy>

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

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

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

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

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

This is addressed in the WIOA Funding Allocation Policy, established by the SWIB, and located at: [WSD Policy](#)

Additional details are provided in subsection 5.A.i.

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

This is addressed in the WIOA Funding Allocation Policy, established by the SWIB, and located at: [WSD Policy](#)

Additional details are provided in subsection 5.A.i.

B. FOR TITLE II

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

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 providers that serve the state's multi-county workforce districts to align with core partner availability and

services. Many platforms will be used to ensure direct and equitable access for the competition. These platforms may include local newspapers, newsletters, press release, social media, and contacts with other state and local agencies. Eligible providers contacted may include, but are not limited to, those listed in Section 203(5): a local education agency, a community or faith-based organization, a volunteer literacy organization, an institution of higher education, a public or private non-profit, a library, a public housing authority, other non-profits that have the ability to provide adult education, a consortium or coalition of entities listed, a partnership between an employer and an entity listed.

In compliance with all state and federal procurement regulations and procedures, the competitive award process will begin with a legal notice posted. This will be followed by the grant release, public Q/A board to provide technical assistance, application review, list of accepted applicants released with follow-up budget and program negotiations with each accepted applicant. The state's procurement system will be used to manage the competitive award process.

The grant 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 grant competitions use the same grant application process.

The state will award multi-year grants on a competitive basis. After the initial year of the multi-year grant award, the state will require each grantee to submit a non-competitive extension component prior to grant renewal and the awarding of allocations at the beginning of a new program year. Grantees are evaluated for performance and continuous improvement, including technical assistance. Failure to meet criteria may result in loss of funding. The extension component will include aspects such as data reflection, goal setting, and narrative responses to promote continuous program improvement. Grant renewals will be made on a program-by-program basis and will be contingent on the program's ability to:

- A. Successfully implement the terms of the grant;
- B. Meet both federal and state performance expectations; and
- C. Provide demonstrated value to the regional areas the program serves.

The most recent WIOA Title II subrecipient award competition was conducted in Spring 2022. The next WIOA Title II award competition is scheduled for spring 2026. Allocations are awarded by a funding formula that recognizes the components of an effective AE program based on the WIOA Statewide Performance Report. Funding is determined using a state-imposed performance-based formula. The formula also includes need-based components such as unemployment, poverty, and drop-out rates.

WIOA [§463.24] mandates that an applicant must demonstrate past effectiveness in providing adult education and literacy activities before that applicant can be considered an eligible applicant. All grant applications will be pre-screened prior to review to determine if the applicant agency meets the standard of demonstrated effectiveness to be considered eligible for an award. As part of the application documents submitted, all interested applicants must submit data covering a two-year period, which includes:

1. The total number of individuals served; and

2. Demonstrates the applicant's effectiveness in providing adult education and literacy activities. Areas of demonstrated effectiveness should align as closely as possible with WIOA performance accountability measures. Data must demonstrate the applicant's effectiveness in providing adult education and literacy services and include evidence of academic gains (reading, writing, mathematics, or English language acquisition), employment outcomes, attainment of secondary credentials, and transitions to postsecondary education and training. WIOA mandates that the SWIB coordinate activities with education and training providers within the designated regional service areas. In accordance with WIOA Title II (34 CFR §463.21), the Montana AEFLA grant solicitation requires that the SWIB be given the opportunity to review all AEFLA applications submitted to the state.

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

The state of Montana answered section ii as a combined response.

C. VOCATIONAL REHABILITATION PROGRAM

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

Montana does not designate a separate State agency to administer VR services for individuals who are blind. Montana is a "combined" VR agency where one State agency administers the plan for all individuals with disabilities, including those who are blind. Therefore, there is no process to determine distributions of funds between any separate agencies.

6. PROGRAM DATA

A. DATA ALIGNMENT AND INTEGRATION

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

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

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

MTDLI's DO Bureau 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 BLS as well as other data sources, such as the U.S. Census Bureau, BEA, and administrative programs. The Montana Career Information System (MCIS) provides comprehensive career information under WIOA. MCIS provides career assessments, state and national occupational, education and training information. All occupational information comes from the DO Bureau's Occupational Employment Statistics and the U.S. Department of Labor's O*Net database.

Montana's WIOA core partners operate across multiple agencies within the state and Montana is pursuing several avenues to increase data interoperability. WIOA programs under Titles I and III collect client intake and program activity data, including any information required for reporting, using the EmployMT system. This system was launched in August 2024. This system is built on ServiceNow and program data is housed in Snowflake data lake, equipping the agency to more readily connect with partner systems. WIOA programs under Title II collect intake and program activity data, including any information required for federal reporting, using LACES (Literacy, Adult and Community Education System). Monthly, quarterly reports are submitted by each program, reviewed and validated by the state. Statewide annual data. Narrative, and fiscal reports are submitted to the National Reporting System (NRS) after the completion of each program year. Data under Title IV is collected using the WellSky system. Each program's client data is tracked individually in each system during the client's participation period. Any performance reporting unique to a specific program is handled within the program's relevant system.

Launched in August 2024, MTDLI's ServiceNow-based MIS, EmployMT, streamlines service delivery for Montana citizens and establishes a unified platform for generating critical performance reports. One of MTDLI's most critical federal requirements is the submission of the Participant Individual Record Layout (PIRL), for both Title I and Title III. This report, submitted both quarterly and annually to the U.S. Department of Labor (DOL), tracks participant performance as required by all states operating under the Workforce Innovation and Opportunity Act (WIOA).

EmployMT serves as the critical engine for federal compliance by capturing and managing all data points mandated by the U.S. DOL. EmployMT provides a comprehensive end-to-end view of the participant lifecycle—from initial demographic and eligibility screening for WIOA programs to the tracking of training milestones and credential attainment. By centralizing enrollment timelines and post-program employment and wage outcomes, EmployMT ensures that Montana's performance is accurately measured, reported, and optimized to meet rigorous federal standards.

EmployMT leverages advanced logical validations to ensure PIRL reporting compliance from the moment data is entered. This proactive approach minimizes WIOA reporting errors, ensuring

more accurate data for the U.S. DOL while freeing technical partners from time-consuming data clean-up.

A core strength of EmployMT is its ability to streamline federal reporting. At the end of each reporting period, it generates the PIRL report in a DOL-compliant format, automating the processing of more than 300 data and logical values to ensure state-wide WIOA accuracy.

By migrating to Snowflake, the State of Montana's designated data warehouse, MTDLI has modernized its data infrastructure. Real-time synchronization from EmployMT to Snowflake facilitates seamless data sharing with WIOA partners through Department of Administration protocols. This shift significantly enhances MTDLI's analytical capabilities, allowing for the expedited delivery of ad-hoc performance reports to agency leadership.

Additionally, the legislature acted in 2023 to enact law requiring an education and workforce data oversight committee. The committee includes WIOA core partners and details are described below in section ii.

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

Within individual agencies, Montana streamlines intake and service delivery. In MTDLI, the new integrated case management system has increased the agency's capabilities with data collection, validation, analysis, and reporting—all of which have helped the agency better partner with all programs in this plan, particularly with data matching, making quick referrals and conducting analysis of shared clients and gaps in service provision. The EmployMT system incorporates all Title I and III programs, plus programs like JVSG, HELP-Link, and the forthcoming RHTP workforce programs which allow for a single stop for program eligibility determinations and streamlined referrals and connections across these programs.

Montana utilizes a cloud data solution using Snowflake storage and analytics service. Driven by the Department of Administration, agencies have begun to move data from existing database structures—which vary widely across agencies in size and architecture—to a cohesive data solution. Moving agencies to the same platform will simplify data sharing and allow for more efficient and accurate data matching. More accessible data will support streamlining of data sharing to support streamlined intake and service delivery across all programs..

Legislation passed during Montana's 2023 state legislative session also mandated the development of a statewide education and workforce data governing board made up of agencies heads and key stakeholders with the intention to facilitate data sharing and bring key education and workforce agencies together to establish shared governance, discuss data architecture, and define reporting requirements. This governing board has begun their work, which will facilitate and formalize data sharing between WIOA partner agencies.

Because core programs are administered out of 2 different agencies, utilizing different providers, and accessing 3 different data systems which are not fully integrated, fully streamlined intake is not yet possible. The state is exploring options to increase integration, including adding kiosks into JSM

and other locations statewide that will provide information and connection to all core program systems that participants engage with. We are also currently exploring opportunities to share office space across programs, especially in our more rural communities where we can combine to achieve fiscal efficiencies and provide better comprehensive services for clients. These will include both a presence for core partners and of providers delivering SNAP/TANF services.

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

The SWIB assists the Governor in aligning technology and data systems across core programs through ongoing review of program implementation and prioritizing system coordination. The board will receive regular updates on the status of alignment efforts and will make alignment recommendations to the core partners, as appropriate.

The SWIB encourages alignment of technology and data systems to support the development of a true one-stop service delivery, through identification of common customers and providing suitable referrals based on data. Additionally, alignment of technology and customer data will allow programs to leverage resources, eliminate duplication and provide new opportunities for innovative cross-program solutions.

The SWIB advises on technologies, including MTDLI's new workforce case management system. The state board's support of this new system will replace an aging system that lacked interoperability. The new system will better facilitate referrals, data sharing, and program evaluation, ultimately improving efficiency in service, enhanced braiding of services, and evaluation of program efficacy.

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

MTDLI currently fulfills WIOA reporting utilizing a new integrated workforce case management system that was implemented August 2024. To ensure compliance with WIOA Section 116, the state performs quarterly and annual data extraction and cleansing from both EmployMT (current) and MWorks (legacy), until the legacy data is no longer included in required performance reporting cohorts. This process generates all mandated financial reports and the full PIRL.

The new system fully supports both WIOA Title I and Title III program and fiscal reporting requirements and will improve the state's ability to better collect, validate, analyze, and report out on activities conducted with individuals and employers across the state.

The state contracts with LiteracyPro to provide a commercially available data management system, LACES, for WIOA Adult Education providers. The LACES data management system is robust, aligns with WIOA Title II reporting requirements, and has a variety of verifications and validations built in to comply with the rules set forth by the National Reporting System for Adult Education (NRS). For

Title II participants, the state utilizes data match to capture employment outcomes as well as a combination of data match and survey methods for postsecondary/training outcomes.

The Title IV program uses its own data collection, case management, and financial reporting system, referred to as Madison, which is used to produce the reports required under Section 116 of WIOA. These financial and data reports are submitted quarterly from the title IV program to the Department of Education.

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.

Administrative data will be used to assess the progress of participants exiting from core programs. MTDLI uses this in tandem with data from other state agencies and programs to perform broad analyses of program success with respect to employment and educational attainment.

In assessing employment outcomes, participants' social security numbers captured during program participation are matched with UI wage data. These data matches can be used to determine the status of exited participants to UI-wage covered employment, representing the individuals' primary income sources and covering approximately 80% of jobs. Measures used to assess outcomes include:

- A. Overall rates of employment post-exit;
- B. Job tenure;
- C. Average wage earnings; and
- D. Wage earning differences pre- and post-participation.

Postsecondary education enrollments and completions of programs are tracked with core program administrative records from data collected during case management, as well as matches to OCHE student records. Measures available to assess outcomes in this domain include:

- A. Credential/degree attainment rate; and
- B. Course enrollment rates.

The data described largely reflects aggregate measures included in the required performance measures under the program. However, MTDLI will conduct analyses to measure progress at additional levels; i.e., outcomes over longer periods of time post-exit. Additionally, analyses will be conducted on more discrete sub-populations of participants based on specific barriers to employment and entry points into WIOA programs. These analyses will provide a broader context about whether participant outcomes were positive, relative to a constructed, counterfactual of individuals with similar backgrounds.

Montana has also begun to conduct more nuanced analyses of our WIOA Adult and Dislocated Worker program outcomes across different demographic subgroups and by provider, assuring the ability to target underserved populations, identify any areas of provider deficiency, and to highlight promising practices amongst individual providers.

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.)

MTDLI utilizes UI wage records through exchanges of data between the state's Unemployment Insurance (UI) program and the DO Bureau. UI wage records, gathered in the Montana Unemployment Services Environment (MUSE) system and quarterly extracts are provided to the DO bureau for the purposes of performance accountability, evaluation, and the development of labor market information. Montana submits quarterly and annual wage requests to the State Wage Interchange System (SWIS), an interstate data-sharing mechanism used to satisfy federal WIOA reporting requirements.

The DO Bureau stores quarterly wage files on secure servers meeting federal confidentiality standards. Experienced DO staff utilize statistical software such as SAS or R to match wage records to person records using Social Security Numbers (SSNs) as the primary key to link records. By linking data, DO staff can perform impact analyses on program activities, produce labor market information about the average outcomes of participants in training programs and maintain confidentiality.

Quarterly wage files are also used in the quarterly performance reporting process. To generate Montana's WIOA Eligible Training Provider (ETP) annual performance report (ETA-9171), reportable participants are matched to wage records via SSNs to calculate program outcomes. Montana also offers statistical support to eligible training providers who enter into MOUs with the department and submit the data needed to match against UI wage records. MTDLI then generates all-participant performance outcomes as required on the ETP performance report.

Analyses produced by the DO Bureau and program performance outcomes generated through the PIRL provide information to guide staff as they assist customers in selecting jobs and training opportunities that are likely to result in quality career paths. MTDLI produced many evaluative publications on workforce programs and the labor market. Examples include:

1. A report on labor market outcomes of participants in MRAP, demonstrating the employment and wage benefits of apprenticeship programs.
2. A report on labor market outcomes of students graduating from the Montana University System and other voluntarily participating educational institutions by degree type and field of study.

3. A report on WIOA Adult and Dislocated Worker Program participant outcomes by variables such as service provider, training program, and demographic differences, providing information to program administrators for target areas for improvement.

As time, funding, and resources permit, DO staff will continue with further evaluations. Staff in the DO Bureau completed an evaluation of the Reemployment Services and Eligibility Assessment (RESEA) program using a RCT. The RCT used UI wage records to estimate the impact of RESEA on employment and wage outcomes. Novel uses of UI wage data matches in program evaluation can inform internal policies, guide continuous improvement projects, and deliver information to program participants to aid their decisions about career paths.

Montana is also working to expand data sources available for wage matching. In the past several years, MTDLI established MOUs for sharing data with two private colleges, several tribal colleges (for limited data), OCHE, and the Montana Department of Revenue. The colleges share PII with the DO Bureau, who in turn matches this information with wage and location when the student becomes employed. The information is then summarized and can be provided to the college. While data sharing exists, MTDLI makes certain that only summary and aggregate data is shared and no UI-related PII is given directly to any entity. These relationships allow MTDLI to provide better workforce system research. MTDLI is working to improve data sharing with the K-12 system.

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 federal guidance on the handling and protection of personally identifiable information (PII) provided in TEGL 39-11. Participant identification numbers, rather than Social Security Numbers, are the primary participant identifier used in Montana's case management systems. While collecting SSNs is a necessity, staff are trained to protect PII on paper forms or on printouts and PII is obscured in any computer systems. All MTDLI staff complete annual cybersecurity training, reinforcing practices to protect PII and computer systems against cybersecurity threats. Additional security measures regarding the system are in place and are evaluated on a continual basis.

7. PRIORITY OF SERVICE FOR VETERANS.

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

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

C. DESCRIBE THE TRIAGE AND REFERRAL PROCESS FOR ELIGIBLE VETERANS AND OTHER POPULATIONS DETERMINED ELIGIBLE TO RECEIVE SERVICES FROM THE JOBS FOR VETERANS

STATE GRANTS (JVSG) PROGRAM'S DISABLED VETERANS' OUTREACH PROGRAM (DVOP)
SPECIALIST/CONSOLIDATED POSITION.

A. MTDLI implemented processes for veterans and eligible spouses (covered persons) to self-identify as eligible for priority of service at the point of entry at JSM locations and the MTDLI website or other electronic means. Covered persons are given priority over non-covered persons for employment, training, and placement of services in all programs, whether funded in whole or in part by USDOL, and are entitled to the precedence and/or access over non-covered persons for services. MTDLI prioritized efforts to identify and engage veterans through the use of signage on entrance doors, encouraging military members, spouses, and veterans to check on priority of service with the local office staff. Additionally, JSM staff have been trained to assist customers to determine covered veteran, covered spouse, and other veteran and other eligible person status as part of the screening process. Once identified as a covered person for priority of service, a veteran will be given information by non-JVSG staff on all services available to them through the JSM office.

For the purpose of implementing priority of service, a broader definition of veteran is used. Under this definition the term "veteran" means a person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable. Active service includes full-time federal service in the National Guard or Reserve component. This definition of "active service" does not include full-time duty performed strictly for training purposes (such as weekend or annual training), nor does it include full-time active duty performed by National Guard personnel who are mobilized by state rather than federal authorities (such as natural disasters).

The definition of a covered person includes a spouse of any of the following:

- Any veteran who died of a service-connected disability.
- Any member of the Armed Forces serving on active duty who, at the time of application for priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
 - Missing in action;
 - Captured in the line of duty by a hostile force; or
 - Forcibly detained or interned in the line of duty by a foreign government or power.
- Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veteran Affairs; or
- Any veteran who died while a disability, (as defined above), was in existence.

Note: An example of priority of service would include a covered person (veteran/spouse) seeking to use the computers at a JSM location and would have first priority of a computer over any non-covered customers also waiting to use a computer.

B. The MTDLI JVSG Program Manager will provide guidelines and assistance to ensure priority of service by:

- Serving as the point of contact for all screening self-assessment priority of service questions from field staff;
- Providing updated Veteran's Screening Tool information to simplify this form; and provide in-person and virtual training as needed and requested by Job Service Offices.
- Maintaining contact, in-person or electronically, with JSM locations to ensure priority of service signage and other self-identification materials for "covered persons" are placed properly in the JSM locations to promote and encourage customers to self-identify for priority of service.

Priority of service for a covered veteran is provided by all JSM non-JVSG staff in the office where priority of service for this veteran is determined. Priority of service for certain training programs and services, where specific eligibility is used, will be discussed with non-JVSG staff and the program or service will be specified.

C. To ensure MTDLI provides the best employment services possible for eligible veterans and eligible persons, a Veterans Screening Tool is completed by non-JVSG staff to determine a job seeker's eligibility for JVSG employment services.

MTDLI uses the Screening Tool to determine priority of service status for covered persons as noted above and determine veterans' status as recognized by USDOL and DVOP eligibility status for JVSG eligible veterans, and eligible persons (which may include spouses, transitioning service members, wounded, ill, or injured service members and their caretakers).

The Screening Tool is completed using the most current guidance of eligibility as provided by Veterans' Program Letters from USDOL, identifying eligible veterans and eligible persons having barriers to employment and other Authorized Populations. After eligibility is determined, a referral is made by a non-JVSG staff member to a JVSG Disabled Veterans' Outreach Program (DVOP) specialist for employment services. DVOP specialists have specialized training from the National Veterans' Training Institute (NVTI) to assist eligible veterans and eligible persons overcome identified barriers to employment which may prevent them from seeking and obtaining gainful employment. An individual determined eligible for JVSG services will receive Individualized Career Services (ICS) based on a comprehensive assessment and an employment plan which includes steps and goals to eliminate each barrier that impedes seeking and obtaining gainful employment. This process provides consistent contact with the veteran or eligible person to foster mutual respect and ownership of the employment plan for the eligible participant.

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

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding the

physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria.

In addition to the state's One-Stop Certification, the state's Equal Opportunity (EO) Officer visits each service provider to thoroughly evaluate sites based on the USDOL's EO monitoring instrument. The Montana Department of Administration General Services Division maintains current structural ADA compliance records for state owned and state leased buildings that are accessible to the EO Officer. The ADA Checklist for Existing Facilities is utilized to review service provider locations for ADA and WIOA Section 188 compliance. The ADA checklist is located here: <https://www.ada.gov/racheck.pdf>.

At least one Job Service Montana workstation per office is easily accessible. Sites that are out of compliance with ADA standards are required to submit a compliance plan and timeline for implementation. Programmatic accessibility is also monitored by the state's EO Officer who designed a monitoring instrument with other states' input and USDOL's Civil Rights Center CRC). The instrument addresses programmatic accessibility and universal access to services provided in Montana's One-Stop System. The EO Officer designs training for service providers and continually looks for additional resources to support a fully integrated and accessible One-Stop System. The EO Officer also reviews customer data and statistics to ensure providers are serving populations equitably throughout the state. Specific populations include, but are not limited to, women, minorities, age groups, and those who self-report a disability.

Compliance training that addresses the needs of individuals with disabilities is incorporated into the EO Officer's training for new case managers and MTDLI's Workforce Services Division administrator, bureau chiefs, and managers. The EO Officer conducts training during on-site visits and also utilizes the Moodle online training program. Various CRC trainings are tailored to apply to Montana service providers and their communities. Annual training is also provided for all staff, including but not limited to, current issues, "hot topics," etiquette for serving individuals, best practices, and regulation updates.

Because of Montana's rural nature, MTDLI utilizes established resources to support access to program services. MTDLI contracts with Language Link (<https://language.link/>) for assistance with all languages, including American Sign Language (ASL).

MonTECH is Montana's federally funded assistive technology program. MonTECH serves any Montanan with a disability, including developmental, physical, and learning disabilities as well as disabilities associated with aging. MonTECH services are provided by a contract with DPHHS's Disability Employment and Transitions Division, and Vocational Rehabilitation funded by the Administration for Community Living under the AT Act of 1998, as amended. The services are provided at no cost to the individual.

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

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

The DO Bureau conducted an analysis of the languages spoken in Montana using micro data from the U.S. Census Bureau's 2017-2021 American Community Survey. This analysis showed Spanish as the second predominant language with approximately 1.4% of the state population speaking Spanish at home. An additional 0.5% of the population speaks Native North American language, ranking third. The analysis showed that there are Spanish speakers in Montana who do not speak English, or do not speak it very well (11.3% of the Spanish-speaking population) and would benefit from interpreter services. Based on this information, Montana posts notices in English and Spanish throughout the One-Stop System.

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

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

IV. COORDINATION WITH STATE PLAN PROGRAMS

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

Montana uses the 406 JOBS framework as the guiding tool for joint planning and coordination across WIOA core programs and required one-stop partners, with the State Workforce Innovation Board (SWIB) serving as the key convener that brings workforce, education, and human services leaders together with industry, legislative leaders, and training providers to set shared priorities, align strategies, and monitor progress.

Regular SWIB meetings, coordinated planning sessions, and cross-agency workgroups of WIOA core partners and Perkins planning agencies ensure that program plans, including updates to the WIOA Combined State Plan and the emerging combined WIOA/Perkins plan, reflect a single, integrated strategy rather than separate program silos.

At the operational level, MTDLI and partner agencies coordinate information across the same base system (ServiceNow) and data storage (Snowflake), common referral protocols, and co-location of services in Job Service offices and other one-stop sites so that job seekers and businesses experience a unified system; these mechanisms also help partners identify and reduce duplication of services by clarifying complementary roles for each program.

In addition, SWIB leverages the 406 JOBS framework to organize joint outreach, stakeholder engagement, and feedback loops with employers, education providers, community-based organizations, and other stakeholders, using their input to refine joint planning efforts and adjust program coordination on an ongoing basis. MTDLI’s Tribal Liaison also facilitates tribal consultation across all 8 recognized tribal nations.

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The Unified or Combined State Plan must include assurances that:

The State Plan must include	Include
1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;	Yes
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;	Yes
3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving	Yes

The State Plan must include	Include
the needs of the populations served by such programs;	
<p>4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public;</p> <p>(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;</p>	Yes
<p>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;</p>	Yes
<p>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);</p>	Yes

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

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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

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

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

A. GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

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

To meet the workforce needs of the state, Montana has a waiver for its state board to carry out the roles and responsibilities of its two local boards. Given the state's vast geography, low population, and dual-agency administration of WIOA core programs, each partner issues policy to their local service sites, then work together to ensure the coordination and alignment of services, including participation in partner conferences and joint strategy and planning activities.

Concentrated Employment Program (CEP)/Balance of State (BOS) issues require that Montana maintain the original boundaries of the CEP. Therefore, allocation funding for adult, dislocated worker, and youth programs considers the local area. All administrative funding, service delivery coordination, policy development, and federal reporting occur on a statewide level. With a large geographic state that includes vast remote areas, service delivery across the state benefits from statewide planning. As such, Montana designates the entire state as one planning region.

To meet regional workforce needs, Montana allocates funding using 12 areas outlined by the Montana Association of Counties (MACo). SWIB membership is representative of both the required positions and geographic diversity of Montana's expansive geography to safeguard local workforce needs and promote local expertise on the state board.

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

Montana has a waiver for its state board to carry out the roles and responsibilities of its two local boards. Montana recognizes a prior-designated 10-county area formed under WIA through the CEP and the remaining 46 counties as separate local areas for funding purposes. However, Montana designated the entire state as one planning region.

All administrative funding, policy development, and federal reporting occur on a statewide level. All service delivery planning, strategic visioning, and coordination occurs at the state level with local input through service delivery partners and the SWIB. Montana's Labor Market Information (LMI) team provides current labor market data and analysis for the various workforce regions. The data includes existing and emerging in-demand industry sectors and occupations and employers' potential needs. For in-demand industry sectors, initiatives are implemented through a statewide network of business engagement specialists.

Montana engages with local elected officials and statewide associations, representing counties and municipalities, on workforce development issues. In addition, the SWIB membership includes local elected officials who engage statewide with MACo and nationally with NACo on local workforce development issues and trends.

Montana’s local governments may submit requests for local area designation to the SWIB and the Governor. The application requires an analysis of local labor market needs, economic development needs, and an assurance that the applicant has access to federal and nonfederal resources to administer activities required under WIOA.

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

An area, board, or entity seeking local area designation can choose to appeal a denial. An appeal must be submitted in writing either by mail or email to the following address(s) within 14 days after the written notification of the decision.

Montana State Workforce Innovation Board
PO Box 1728
Helena, MT 59624-1728

Or

The appeal requires justification for the appeal in the request. The area, board, or entity also has the right to request a hearing.

The appeals procedure will allow for a review before the SWIB Executive committee if requested and a decision will be made within 60 days of appeal. This will be a final decision and the area, board, or entity will be unable to reapply for one year from the date of final notification by the state.

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

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

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

Step 1: Notice of Failure to Reach Consensus Given to Governor: If the parties cannot reach consensus on methods of sufficiently funding an American Job Center’s (AJC) infrastructure cost and the amounts to be contributed by each partner program, the SWIB (or designee) is required to notify the Governor.

Step 2: Negotiation Materials Provided to Governor: The SWIB Chair (or designee) must provide the appropriate and relevant materials and documents used in the negotiations to the Governor, preferably at the time of the notification of failure to reach consensus, but no later than 5 business days thereafter. At a minimum, the SWIB Chair (or designee) must provide to the Governor:

- The State Plan;

- The cost allocation methodology or methodologies proposed by the partners to be used in determining the proportionate share;
- The proposed amounts or budget to fund infrastructure costs;
- The amount of partner funds included;
- The type of funds (cash, non-cash, and third-party in-kind contributions) available (including all documentation on how partners valued non-cash and third-party in-kind contributions consistent with 2 CFR 200.306);
- Any proposed or agreed on AJC budgets (for individual centers or a network of centers); and
- Any partially agreed upon, proposed, or draft IFAs.

The SWIB (or designee) may also provide the Governor with additional materials that they or the Governor find to be appropriate.

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

- Determine AJC infrastructure budget(s);
- Establish cost allocation methodology(s);
- Determine Partners' proportionate shares;
- Calculate statewide cap;
- Assess the aggregate total of infrastructure contributions as it relates to the statewide cap; and
- Adjust allocations.
- Once all determinations and calculations are completed, the Governor will notify the SWIB Chair (or designee) of the final decision and provide a revised IFA for execution by the parties.

Step 4: IFA Execution: The IFA becomes effective as of the date of signing by the final signatory. Programs may appeal to 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

Montana provides policy guidance governing the state's public workforce and talent development system in compliance with all local, state, and federal laws. The state statute that governs the state's Department of Labor are contained in Title 39 of the Montana Code Annotated. All WIOA policies are posted online at <https://wsd.dli.mt.gov/wsd-policy>.

B. Describe how the State intends to use Governor's set aside funding for mandatory and discretionary activities, including how the State will conduct evaluations of Title I Adult, Dislocated Worker, and Youth activities.

Montana will use the Governor's reserve funds to modernize career exploration as a central accountability and innovation strategy. The state will focus on building public-facing tools that

integrate labor market information with credential and learning outcome data so students, jobseekers, and counselors can compare programs, see likely employment and wage outcomes, and make better-informed decisions about education and training that connect existing skills and abilities into career pathways. These investments will also enhance transparency by making performance and outcome data more accessible and understandable to the public and by embedding those data into a stronger, more effective Eligible Training Provider List, ensuring that resources flow to programs with demonstrated results.

The Governor's set-aside will also support targeted initiatives to expand Registered Apprenticeship and to strengthen services for veterans. For Registered Apprenticeship, funds will be used to expand the use of apprenticeship as a training pathway, increasing accessibility to credentials and careers for potential learners and improving worker mobility into higher-wage, in-demand occupations. For Veterans, investments will focus on providing more robust, coordinated services that better connect Veterans and transitioning service members to civilian careers, reducing barriers and more effectively translating the skills and abilities acquired in the military into jobs available in Montana's labor market.

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

Montana relies on local relationships within business and economic development communities to identify businesses at risk of or in the process of downsizing or closing. As these potential layoff events are identified, the MTDLI coordinates a local response with providers to eliminate or reduce the impact of the layoff on individuals and the community. Montana continues to engage USDOL on the development of a policy and funding framework that allows states to proactively coordinate and support businesses that experience a downturn leading to layoffs.

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

In the event of a disaster declaration, MTDLI coordinates with the Governor's Office, FEMA, and appropriate state agencies to deliver Rapid Response services to businesses and workers impacted by the disaster. During a disaster declaration, Rapid Response services are coordinated by MTDLI's Workforce Services (including JSM staff) and Unemployment Divisions to contact and provide timely information and services to impacted workers.

E. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) AND ENSURES THE PROVISION OF APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED. (SECTION 134(A)(2)(A) AND TAA SECTION 221(A)(2)(A) .) THIS DESCRIPTION MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE WORKERS IN THE GROUPS IDENTIFIED IN THE TAA PETITIONS WITH AN ACCURATE UNDERSTANDING OF THE PROVISION

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

In Montana, trade-impacted workers receive Trade Adjustment Assistance (TAA) information and services through Rapid Response, Dislocated Worker, and Wagner-Peyser programs. MTDLI operates these programs statewide. JSM coordinates all Rapid Response activities, helps businesses or workers file TAA petitions, and brings 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 managers use a variety of formal assessment tools, including but not limited to, education assessments designed by the Adult Education Program, assessments offered the Montana Career Information System (MCIS); and eSkill proficiency tests.

Rapid Response services are provided to all workers experiencing layoffs. During the Rapid Response workshop, staff informs workers of the following services: how to start a UI claim, Title I workforce services, TAA benefits, and community resources.

Montana also invests rapid response resources in their business engagement team to implement a pro-active, business-focused strategy designed to help growing companies meet existing and future talent needs. After the announcement of layoffs or a plant closure, rapid response services are coordinated quickly to ensure rapid reemployment, minimize the negative impacts, strengthen and support the TAA program and Rapid Response events, and enhance Montana's overall effectiveness in engaging with Montana businesses and responding to industry needs.

B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS

1. WORK-BASED TRAINING MODELS

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

Montana's work-based training is designated for higher-skilled occupations and not designed to subsidize low-skilled occupations. The focus is on the six high-demand sectors as well as the four

pathways to employment as outlined in the 406 JOBS Initiative, namely, health careers, construction trades, advanced manufacturing and computing, education and childcare, hospitality and recreation as well as financial and professional services.

On-The-Job training (OJT) is utilized by participants in WIOA-funded and state-funded programs and apprenticeships. Before an OJT contract is established, employers are screened to ensure the job placement provides a wage that meets the participant's needs and to ensure the employer meets all requirements to be eligible for OJT funds. The length of the OJT training is determined by researching the O*Net system to identify the complexity of the specific job when considering the participant's current level of skill in that occupation.

Montana offers a state-funded Incumbent Worker Training (IWT) program which is a competitive grant that provides resources to help eligible Montana businesses fund skills-based training for their workers. The training must result in a certificate or credential and must improve the productivity, efficiency, or wages in the worker's existing jobs. The business must have a demonstrated need for the training to remain competitive in their industry or the global economy.

Montana's WIOA funding does not currently support incumbent worker training, although currently employed workers may qualify for skill upgrading through WIOA programs. Both customized training and incumbent worker training are areas Montana plans to research over the next state plan cycle. Montana sees potential opportunity in both areas as ways to stretch program dollars by partnering with industry sectors.

2. REGISTERED APPRENTICESHIP

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

MRAP will continue to expand and include a broader range of professions to meet the needs of Montana's employers. Apprentices participate in the growing and in-demand fields of information technology, manufacturing, and healthcare, in addition to traditional apprenticeships for plumbers, carpenters, electricians, and other trades. Apprentices also participate in college-level science and technology coursework necessary for modern-day success.

MRAP staff routinely meet and collaborate with local service providers statewide. They participate in weekly staff meetings with WIOA program managers, identifying apprentices that may be eligible for WIOA programs. Co-location of apprenticeship staff at JSM offices provides MRAP staff with the resources and outreach to expand workforce engagement statewide including, but not limited to, participation in rapid response efforts and coordination with the dislocated worker program. MRAP partners on outreach and apprenticeship design with Montana's seven tribal communities.

Montana's 2400 active apprentices spread over 650 program sponsors illustrate an increase of 30% during the last five years. To continue to improve apprenticeship opportunities, MRAP added 12 new occupations, including Master Brewer, Industrial Manufacturing Technician, Computer

Support Specialist, Surgical Technologist, and Meat Cutter plus over 20 different occupations in healthcare.

MRAP will cultivate additional relationships statewide with employers and industry associations to grow occupations and increase the capacity for apprentices.

3. TRAINING PROVIDER ELIGIBILITY PROCEDURE

Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

MTDLI complies with WIOA requirements to identify and approve training providers before WIOA title I funds can be used to pay for occupational training for adults and dislocated workers. MTDLI maintains a list of eligible training providers and their eligible training programs, accompanied by relevant performance and cost information to ensure informed customer choice for training, performance accountability, and continuous improvement.

Providers of training services are required to be on the Montana ETPL to receive WIOA Title I Adult, Dislocated Worker, and Youth funding for training services. Training services are provided through Individual Training Accounts (ITA). Eligible training providers are allowed to receive funding through an ITA:

- Institutions of higher education with programs leading to a recognized postsecondary credential
- Entities that carry out programs registered under the National Apprenticeship Act (29 U.S.C. 50)
- Eligible providers of Adult Education and Literacy activities under WIOA Title II if such activities are provided in combination with occupational skills training
- Public and private providers of a program of training services, which may include community-based organization and joint labor-management organizations
- A local workforce development board, if it meets the conditions of WIOA sec. 107(g)(1).

Registered Apprenticeship Program Providers

Under WIOA Title I, Registered Apprenticeship Programs are automatically eligible for placement on the state-approved ETPL. Registered Apprenticeship Program (RAP) sponsors seeking ETP inclusion must either be based in Montana or have an established partnership with a Montana business and must provide the following information in the application:

- Occupations included within the RAP
- Name and address of the RAP sponsor
- Names and addresses of the Related Instruction provider(s) and the location(s) of instruction if different from the program sponsor's address

- Method and length of instruction
- Number of active apprentices.
- A W-9 from the sponsor

RAPs are not subject to the same application and performance information requirements, a period of initial eligibility, or initial eligibility procedures as other providers due to the detailed application and vetting procedures required by the U.S. DOL Office of Apprenticeship (OA). RAP status verification is conducted every two years, at a minimum, with U.S. DOL OA.

RAPs in good standing with OA will remain on the ETPL until the:

- Program has been deregistered by a finding of the U.S. DOL
- Program sponsor has notified the State that it no longer wants the program to be included on the list
- Program sponsor has intentionally provided inaccurate information
- Program has violated any provision of Title I of WIOA or the WIOA regulation, including 29 CFR §38 for no less than two years.

Note: Pre-apprenticeship programs do not receive the same WIOA exceptions allowed for RAPs. Pre-apprenticeship programs seeking initial or continued eligibility to the ETPL must follow the same process requirements as other non-RAP training providers, as described in this policy

With the new MIS launched in Montana, the continuing eligibility and renewal process for training providers has changed. After the initial eligibility period has expired, training providers must reapply to remain on the ETPL. They must review and update training and program information in the new Employer Business Portal, providing required information not limited to reporting requirements. When all requested information has been reviewed and approved by the ETP Program Manager, the MIS will renew the training provider.

MTDLI's ETPL is a comprehensive list that includes all statewide providers, program description/curriculum, training cost, and program duration among other many other details to ensure the appropriate training provider/program is selected by eligible participants in consultation with their case managers, and meets the criteria within the 406 JOBS Initiative of an in-demand occupation within Montana. The public and service providers can view the application for initial eligibility at <https://montanaworks.gov/training>.

To be considered eligible for inclusion on the ETPL, a training provider must create an account in the MIS business portal. Training providers in operation for at least twelve (12) months must apply for initial eligibility, which can be granted for up to one full year. The initial application must be complete for both provider and training program for initial approval. All approved providers must undergo an annual performance review to remain on the ETPL.

For providers/programs that have never operated, a demonstration of a strong connection to the labor market is required. Acceptable indicators are a letter of commitment to placing graduates in

internships or apprenticeships; hiring contracts with an established business; or two or more letters of support specific to the training program from potential employers of program graduates.

For continued eligibility, all providers must meet reporting and performance requirements. RAPs are not required to submit performance information.

The primary indicators of performance for ETPL programs are modeled on the required reporting elements of the adult, dislocated worker:

- Total number of individuals served – The total number of students (WIOA and non-WIOA) in the program of study in the reporting period.
- Total number of individuals exited – The total number of students (WIOA and non-WIOA) who completed, withdrew, or transferred from this program of study in the reporting period.
- Total number of individuals who completed the program – The total number of students (WIOA and non-WIOA) who completed (did not withdraw or transfer) this program of study in the reporting period.
- Credential attainment rate – The total number of students (WIOA and non-WIOA) who completed the training program AND attained a credential associated with the program of study within one year after exit. This includes all students who attained a recognized postsecondary credential during the program or within one year after exit OR attained a secondary school diploma or its equivalent, and who were also employed or enrolled in an education or training program leading to a postsecondary credential within one year after training program exit.
- Social Security Number (SSN) - Include the social security numbers of students (WIOA and non-WIOA) for the purpose of direct UI wage record match or supplemental wage information conducted by MTDLI.
- Employment rate 2nd and 4th quarter after exit – The total number of students (WIOA and non-WIOA) from the training program who are found to be employed.
- Median earnings 2nd quarter after exit – Total quarterly earnings, for the total number of students (WIOA and non-WIOA) who are employed in the second quarter after exit.
- Average earnings 2nd and 4th quarters after exit – Average earnings of students (WIOA and non-WIOA) in the training program who are in unsubsidized employment during the second and fourth quarters after exit.

MTDLI will continue to review initial and continued eligibility, procedure, and information requirements to ensure that eligible training providers are available in local workforce areas and successful in meeting training requirements for targeted or in-demand occupations.

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

Montana updated the Adult Program policy to define and incorporate the WIOA service priority groups, including those with significant barriers to employment and veterans and eligible spouses. The policy is located at <https://wsd.dli.mt.gov/wsd-policy>To qualify for individualized career services and training services, an individual must meet at least one priority of service category (veteran or eligible spouse, WIOA priority group, or individuals with a significant barrier to employment). When funds are limited, service priority—detailed below—is required:

1. Veterans and eligible spouses who meet the WIOA priority group of public assistance recipient, low-income individual, or basic skills deficient;
2. Other individuals (not veterans or eligible spouses) who meet the WIOA priority group of public assistance recipient, low-income individual, or basic skills deficient;
3. Veterans and eligible spouses with a significant barrier to employment;
4. Other individuals (not veterans and eligible spouses) with a significant barrier to employment; and
5. All other veterans and eligible spouses.

The policy defines veteran and eligible spouses. Veterans include an individual who served in the active military, naval, air, or space service; and who was discharged for released under conditions other than dishonorable. Veteran eligible spouse includes the spouse of any of the following individuals: any veteran who died of a service-connected disability; any veteran who has a total disability resulting from a service-connected disability as evaluated by the Department of Veteran Affairs or any veteran who died while such a disability was in existence; or any member of the Armed Forces serving on active duty who is currently listed in one or more of the following categories and has been for more than 90 days – missing in action, captured in the line of duty by a hostile force, or forcibly detained or interned in line of duty by a foreign government or power.

Montana’s policy adheres to the required threshold of ensuring that WIOA priority groups (recipients of public assistance, low-income individuals, and individuals who are basic-skills deficient) must account for at least 75% of adult program participants receiving individualized career services or training services.

Individuals with a significant barrier to employment include:

1. Displaced homemaker
2. Indian, Alaska Native, and Native Hawaiian
3. Individual with a disability
4. Older individual (55+)
5. Ex-offender

6. Individual who has aged out of the foster care system
7. Eligible migrant and seasonal farmworker
8. Individual within 2 years of exhausting lifetime eligibility for TANF
9. Single parent (including single pregnant woman)
10. Long-term unemployed individual

Priority of Service is determined during the screening process before any individualized career service or training service is provided. Every individual can be screened for WIOA programs and services, but only those who meet criteria may receive individualized career services and training services.

Montana monitors each service provider once a year. This includes verifying that priority of service documentation is in the participants file and reflects eligibility for priority of service. Montana's management information system also requires indication of a priority of service before the ability to enroll in the WIOA Adult Program.

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

In 2023, Montana revised its WIOA Funding Allocation policy with SWIB approval, allowing for the transfer of up to 100 percent of both adult and dislocated worker funds between the adult and dislocated worker programs within a local area.

Montana's dislocated worker funds are contracted to one service provider, JSM, who provides services throughout the state to both local areas. Funds are not restricted by MACo district and can be used within each local area based on need. Criteria to establish need can include increase in number of enrollments, major layoffs, increased training costs, new employers, and targeted industries, etc.

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

For every TAA participant, Montana's TAA policy requires co-enrollment in the dislocated worker program and all applicable programs. At their quarterly meetings, the SWIB director and MTDLI staff provide program-related information. In addition, designated TAA staff provide technical assistance, policy guidance, and training to all local service providers to ensure that co-enrolled participants receive the appropriate services.

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

Every TAA participant receives a rapid response service. Similarly, Montana's dislocated worker and state displaced homemaker policies both require, as part of the case management process, co-

enrollment of eligible participants in all applicable programs as appropriate. The policies also require coordination of joint training plans and employment services as necessary and appropriate.

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

MTDLI's Workforce Services Division staff provide updates to JSM management. MTDLI also provides technical assistance and guidance to all local service providers, either monthly or quarterly, through a series of formats: new case manager training, technical assistance calls, and information as requested to ensure that case managers and JSM management are fluent in TAA program requirements.

C. YOUTH PROGRAM REQUIREMENTS.

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

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

¹¹ Sec. 102(b)(2)(D)(i)(V)

Montana's youth providers are selected through a subrecipient award process following federal and state procurement laws. Criteria is developed in coordination with the SWIB and encompasses all USDOL program requirements.

Criteria includes:

1. Demonstrated effectiveness;
2. Financial stability;
3. Fiscal and performance accountability;
4. Cost effectiveness;
5. Qualifications and expertise of staff, and;
6. Demonstrated linkages between WIOA Title II Adult Education and Literacy providers, schools, and employers.

Providers respond to the grant request with bids to provide services in the two local areas comprised of Montana's 12 MACo districts. The map of the MACo Districts: <http://www.mtcounties.org/events/maco-district-meetings/>

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USDOL sets performance measures. When Montana failed to meet the negotiated level of performance for the WIOA youth program in PY21, the state worked with Region 4's youth and performance Federal Project Officers (FPOs) to address the low performance levels. The state developed an action plan and provided the following types of technical assistance to youth providers in 2023:

1. Initial technical assistance phone calls with each provider;
2. In-person performance TA to youth providers and state staff by Region 4's youth FPO and ETA's Youth Policy and Performance Specialist;
3. New WIOA youth case manager training with required attendance for both new and experienced WIOA case managers;
4. A follow-up performance call with all youth providers;
5. One-on-one performance calls with the youth providers that did not attain MSG performance in the final PY'22 quarter; and
6. Submission of a performance improvement plan by all providers that did not attain MSG performance in the final PY'22 quarter.

Montana's performance indicators are in the Youth Policy located on Montana's Workforce Services Division website: <https://wsd.dli.mt.gov/wsd-policy>

WIOA Title I Youth providers are monitored annually for performance, program, and fiscal accountability to ensure services align with WIOA guidelines.

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

MTDLI received approval of two waivers creating equitable results for out-of-school (OSY) and in-school youth (ISY). Approval of the first waiver reduces the minimum expenditure requirement of service from 75% for OSY to 50%. This helps WIOA youth providers to increase the number of (ISY) served. The waiver approval will enhance partnerships among WIOA core partners and the MUS. MTDLI expects the number of ISY served will steadily increase and performance outcomes for both ISY and OSY will remain steady or experience an increase in performance indicators. The flexibility to serve a higher percentage of ISY ensures these youth receive the same level of help as OSY, while

working toward successful completion of secondary and post-secondary education. Approval of the second waiver allows the state to use Individual Training Accounts (ITAs) to benefit ISY in the same manner it benefits OSY. Tuition can be paid for qualifying youth:

1. Attending secondary school by paying tuition for dual-credit courses that aren't covered by the One-Two-Free dual enrollment program; and
2. Already attending or preparing to attend post-secondary education who require an ITA.
3. DESCRIBE HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN IMPLEMENTING INNOVATIVE MODELS FOR DELIVERING YOUTH WORKFORCE INVESTMENT ACTIVITIES, INCLUDING EFFECTIVE WAYS LOCAL WORKFORCE BOARDS CAN MAKE AVAILABLE THE 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2); AND EXPLAIN HOW LOCAL AREAS CAN ENSURE WORK EXPERIENCE, INCLUDING QUALITY PRE-APPRENTICESHIP AND REGISTERED APPRENTICESHIP, IS PRIORITIZED AS A KEY ELEMENT WITHIN A BROADER CAREER PATHWAYS STRATEGY.

Montana's WIOA Youth Program policy describes the 14 program elements in WIOA Section 129(c) (2) which service providers must offer to eligible youth participants through direct service or referral partnerships. The required scope of services, detailing how the service provider will safeguard and deliver the 14 program elements based on demonstrated participant need, is included in providers' contractual language. Youth providers have discretion in determining which specific program elements they will provide or contract-out based on the results of individual objective assessments and individual service strategies developed jointly with the participant. Program providers are not required to directly deliver all 14 elements. However, at a minimum, providers must directly deliver elements 3, 7, 9, and 13. In addition to this, during the enrollment period, at least one element must be utilized every quarter.

WIOA providers assess each youth to ensure the appropriate program elements are provided based on specific circumstances, whether the participant is an ISY or OSY, with the goal of meeting performance measures. Funds will provide:

1. Support to complete secondary school education, through partnerships with Adult Education, alternative high school education, and high school equivalency credential preparation including tutoring with eligible tutors.
2. Support to individuals that may include paying for high school equivalency credential practice tests and the supplies needed to complete their educational goals.
3. Training support to both ISY and OSY participants who are eligible for an ITA to assist with tuition and required training-related supplies needs.
4. Support to individuals completing leadership development activities, including job search and life skills workshops, conferences, and team building activities.
5. Funding for reasonable expenses required for participation in training and employment activities.

6. Referrals to fee-for-service providers who offer mentoring to participants either on a one-on-one or group basis.
7. Individual counseling that may include family counseling, trauma counseling, substance abuse counseling and intervention, mental health counseling, and medication management.
8. Financial literacy including budgeting workshops, courses, and activities.
9. Entrepreneurial skills training.
10. Career assessments; and
11. Activities that help prepare participants for and transition to post-secondary education and training.

Paid work experience remains a priority element and Montana continues to show consistency in meeting and exceeding the 20% expenditure requirement. The state will continue to encourage pre-apprenticeships and registered apprenticeship opportunities in conjunction with work experiences. To reduce duplication of services, providers coordinate with partners in their area whenever possible.

Throughout implementation of 406 JOBS and America’s Talent Strategy Pillar V, WIOA youth providers are encouraged to expand work experience opportunities for youth into the high demand sectors including AI training, construction trades, in the health field and childcare. Providers will also be encouraged to expand work experiences by recruiting and increasing their awareness of providing apprenticeships and pre-apprenticeships to WIOA youth. This includes educating potential employers on the benefits of offering apprenticeships and pre-apprenticeship training opportunities for WIOA youth regardless of school status.

4. PROVIDE THE LANGUAGE CONTAINED IN THE STATE POLICY FOR “REQUIRING ADDITIONAL ASSISTANCE TO ENTER OR COMPLETE AN EDUCATIONAL PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT” CRITERION FOR OUT-OF-SCHOOL YOUTH SPECIFIED IN WIOA SECTION 129(A)(1)(B)(III)(VIII) AND FOR “REQUIRING ADDITIONAL ASSISTANCE TO COMPLETE AN EDUCATION PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT” CRITERION FOR IN-SCHOOL YOUTH SPECIFIED IN WIOA SECTION 129(A)(1)(C)(IV)(VII). IF THE STATE DOES NOT HAVE A POLICY, DESCRIBE HOW THE STATE WILL ENSURE THAT LOCAL AREAS WILL HAVE A POLICY FOR THESE CRITERIA.

Montana’s WIOA Youth Program policy contains language related to additional assistance to complete an educational program to secure and hold employment. It is described below:

Out-of-School Youth (OSY)

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 to obtain or retain employment. OR

A youth who requires assistance to 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.

In-School Youth (ISY)

A youth (14-21) who requires additional assistance to complete an educational program:

A youth who is at risk of dropping out of high school as documented by his/her school; or previously dropped out and has returned to school (including an alternative school); has below average grades; or a youth with poor attendance patterns in an educational program during the last 12-calendar months; or was suspended or expelled from school within the last 12-calendar months; or previously placed in out-of-home care (foster care, group home, or kinship care) for more than 6 months. OR

A youth who requires assistance to 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; fired from a job in the last six calendar months; or lacks work readiness skills necessary to obtain and/or retain employment.

D. SINGLE-AREA STATE REQUIREMENTS

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

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

It's Montana's understanding that we only respond to (1).

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

It's Montana's understanding that we only respond to (1).

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

It's Montana's understanding that we only respond to (1).

6. HOW TRAINING SERVICES OUTLINED IN SECTION 134 WILL BE PROVIDED THROUGH INDIVIDUAL TRAINING ACCOUNTS AND/OR THROUGH CONTRACTS, AND HOW SUCH TRAINING APPROACHES WILL BE COORDINATED. DESCRIBE HOW THE STATE WILL MEET INFORMED CUSTOMER CHOICE REQUIREMENTS REGARDLESS OF TRAINING APPROACH.

It's Montana's understanding that we only respond to (1).

7. HOW THE STATE BOARD, IN FULFILLING LOCAL BOARD FUNCTIONS, WILL COORDINATE TITLE I ACTIVITIES WITH THOSE ACTIVITIES UNDER TITLE II. DESCRIBE HOW THE STATE BOARD WILL CARRY OUT THE REVIEW OF LOCAL APPLICATIONS SUBMITTED UNDER TITLE II CONSISTENT WITH WIOA SECS. 107(D)(11)(A) AND (B)(I) AND WIOA SEC. 232.

It's Montana's understanding that we only respond to (1).

8. COPIES OF EXECUTED COOPERATIVE AGREEMENTS WHICH DEFINE HOW ALL LOCAL SERVICE PROVIDERS WILL CARRY OUT THE REQUIREMENTS FOR INTEGRATION OF AND ACCESS TO THE ENTIRE SET OF SERVICES AVAILABLE IN THE ONE-STOP DELIVERY SYSTEM, INCLUDING COOPERATIVE AGREEMENTS WITH ENTITIES ADMINISTERING REHABILITATION ACT PROGRAMS AND SERVICES.

It's Montana's understanding that we only respond to (1).

E. WAIVER REQUESTS (OPTIONAL)

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

1. IDENTIFIES THE STATUTORY OR REGULATORY REQUIREMENTS FOR WHICH A WAIVER IS REQUESTED AND THE GOALS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, INTENDS TO ACHIEVE AS A RESULT OF THE WAIVER AND HOW THOSE GOALS RELATE TO THE UNIFIED OR COMBINED STATE PLAN;
2. DESCRIBES THE ACTIONS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, HAS UNDERTAKEN TO REMOVE STATE OR LOCAL STATUTORY OR REGULATORY BARRIERS;
3. DESCRIBES THE GOALS OF THE WAIVER AND THE EXPECTED PROGRAMMATIC OUTCOMES IF THE REQUEST IS GRANTED;
4. DESCRIBES HOW THE WAIVER WILL ALIGN WITH THE DEPARTMENT'S POLICY PRIORITIES, SUCH AS:
 - A. SUPPORTING EMPLOYER ENGAGEMENT;
 - B. CONNECTING EDUCATION AND TRAINING STRATEGIES;
 - C. SUPPORTING WORK-BASED LEARNING;
 - D. IMPROVING JOB AND CAREER RESULTS, AND
 - E. OTHER GUIDANCE ISSUED BY THE DEPARTMENT.

5. DESCRIBES THE INDIVIDUALS AFFECTED BY THE WAIVER, INCLUDING HOW THE WAIVER WILL IMPACT SERVICES FOR DISADVANTAGED POPULATIONS OR INDIVIDUALS WITH MULTIPLE BARRIERS TO EMPLOYMENT; AND

6. DESCRIBES THE PROCESSES USED TO:

A. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;

B. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;

C. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;

D. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.

E. COLLECT AND REPORT INFORMATION ABOUT WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT.

F. THE MOST RECENT DATA AVAILABLE REGARDING THE RESULTS AND OUTCOMES OBSERVED THROUGH IMPLEMENTATION OF THE EXISTING WAIVER, IN CASES WHERE THE STATE SEEKS RENEWAL OF A PREVIOUSLY APPROVED WAIVER.

Request #1: State Board Act as Local Boards

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

Montana is formally seeking a waiver to permit the state workforce board to carry out the functions of local boards for Program Years 2026 and 2027. This waiver request is for a renewal of a waiver previously applied via 20 CFR 679.310(f) which states that a state board may carry out the roles of a local board when the State Plan indicates that the State will be treated as a local area under WIOA. WIOA Section 107(b) also directs a state board for a single state local area to carry out the functions of the local board. The SWIB has acted as both the state and local board under WIA since January 1, 2006.

This structure will be (re)reflected in the Combined State Workforce Plan.

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

The primary goal of this waiver is to limit annual overhead and maximize the amount of funds made available for direct services to individual and business customers. The programmatic outcome is to serve the largest number of participants possible with the funding available. Maintaining local workforce boards redirects funding that otherwise would be available for direct service delivery. To maximize funding directed towards participants, the state will continue to use the SWIB as the local workforce board. When initially implemented, this saved the state WIA program approximately \$1.2 million by removing administrative overhead of maintaining multiple regions throughout the state. The initial change to a single statewide planning area structure, in conjunction

with this waiver, provides a structure that ensures more people are served instead of multiple administrative areas splitting minimal funding. It allows the state to continue to serve at least the same number of customers of all types, despite reduced and/or level funding over recent years.

The SWIB was in place prior to the inception of WIOA. The two local areas defined in Montana include Area 1 and Area 2. Area 1 consists of 10 counties in southwest Montana, while Area 2 includes the remainder of the state. According to the 2020 Census, the population of Area 1 is 160,858. The population of Area 2 is 900,847. Another discrepancy with the two local areas is that Area 1 does not include any of Montana's Native American reservations or nations, while Area 2 includes all 7 reservations and 8 tribal nations. With the state board's ability to carry out the roles of local boards, Montana residents are served more effectively and equitably. Dating back to 2005, Governor Brian Schweitzer consulted with local elected officials from the 10 counties within Area 1 to enter into an agreement for all 10 counties to be included into one state planning area. Since then, local elected officials from all over Montana have and continue to serve on the SWIB.

As evidenced since its initial implementation, the single statewide planning structure has reduced annual overhead and maximized available funding for training and direct customer services. This statewide structure enhances efforts to transform the system into a demand driven system and directly supports the importance of local community partnerships with 18 Job Service Montana offices serving as the state's American Job Centers offering workforce development services across the state.

The SWIB was in place prior to the inception of WIOA. Current SWIB membership reflects the geographic diversity of the state and its local elected officials and aligns with WIOA's statutorily prescribed composition. This includes a majority representing private business and others representing workforce and education, WIOA core partners, labor, and elected officials. Current board members include business representatives, elected officials, and labor representatives representing 13 different Montana counties that span from Flathead County in Western Montana to Dawson County in Eastern Montana, areas over 500 miles apart. The range of represented areas ensures that input is received from the perspectives of Montana's largest counties with populations over 100,000 to Montana's smaller counties with populations under 10,000 facing different labor market realities and with different industry needs. This composition ensures that local input is received and incorporated into Montana's planning structure and maximizes cooperation, engagement, and service delivery.

Since its initial implementation, the single statewide planning area structure reduced annual overhead cost, strengthened administrative oversight and accountability, reduced potential for disallowed costs, and enabled more funds to go to participants. Montana continues to emphasize a minimum 50% of all WIOA funds go to direct services. In the most recent program year approximately 60% of funds went towards direct services. This and other program goals are reviewed quarterly.

A public comment period will be provided by including this waiver as part of Montana's WIOA Combined State Plan, to be posted for public comment on mid-cycle updates between March 20, 2026 and April 27, 2026. The plan will be noticed to interested parties such as all SWIB members,

the SWIB Interested Persons list, the Montana Association of Counties, the Montana League of Cities and Towns, local elected officials, service providers, organized labor, and other partners and stakeholders of the workforce system. The process and notification of interested persons through email is aligned with State of Montana public meeting laws and MTDLI policy. Looking forward, MTDLI will continue to seek input from local elected officials to obtain feedback about this waiver request and history. The impact of this waiver to the state's WIOA performance, as well as any other related outcomes, will be collected and reported in the state's WIOA Annual Report.

Montana has found success with minimal costs (1 board director) and a unified approach to the state's workforce development under the current waiver.

Waiver Request #2 – One Comprehensive One-Stop Center

The state of Montana, in agreement with the SWIB, is requesting to waive the requirement outlined in WIOA sec. 121 (e)(1) and 20 CFR 678.300 (c) to establish a comprehensive one-stop delivery system in each local area for Program Years 2026 and 2027. This waiver request is for a renewal of a previously applied waiver. Although the State of Montana has two local areas, the Balance of State (BOS) and Concentrated Employment Program (CEP), the SWIB carries out the roles and responsibilities of the local workforce development boards (WDB) through a waiver from USDOL at the inception of WIOA. The SWIB's waiver removed barriers, such as minimizing administrative activities costs, reducing administrative burdens, and allowing the state to redirect funding for direct participant services. Historically, the state of Montana had one comprehensive one-stop delivery system (also referred to as American Job Center (AJC)) and currently has 18 affiliate AJCs. Therefore, the requirement to establish a comprehensive one-stop center in each local area would impact the progress the state has made by adding an estimated \$100,000 in administrative costs, which could otherwise be used to serve 20 Montanans in WIOA programs. The two offices in the CEP, Butte and Helena, that would be considered Comprehensive Centers already provide direct access or closely coordinated indirect service access to all workforce partner programs, as identified in the 2023 Certification of the One-Stop Centers, ensuring that job seekers in both areas have equitable access to programs, services and activities of one-stop partners.

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

The primary goal of this waiver is to limit annual overhead and maximize the amount of funds made available for direct services to individual and business customers. The programmatic outcome is to serve the largest number of participants possible with the funding available. To maximize resources available for direct service delivery, the state will continue to use the SWIB as the local workforce board.

As evidenced since its initial implementation, the single statewide planning structure has reduced annual overhead and maximized available funding for training and direct customer services. This statewide structure enhances efforts to transform the system into a demand driven system and directly supports the importance of local community partnerships. The 18 JSM offices serve as the state's American Job Centers offering the full range of workforce development services.

The initial change to a single statewide planning area structure, in conjunction with this waiver, provides Montana a structure that ensures more people are served instead of multiple comprehensive one-stop centers providing the same services and splitting minimal funding. Additionally, it allows the state to continue to serve at least the same number of customers of all types, without a need to increase overall funding.

A public comment period will be provided by including this waiver as part of Montana's WIOA Combined State Plan, to be posted for public comment on mid-cycle updates between March 20, 2026 and April 27, 2026. The plan will be noticed to interested parties such as all SWIB members, the SWIB Interested Persons list, the Montana Association of Counties, the Montana League of Cities and Towns, local elected officials, service providers, organized labor, and other partners and stakeholders of the workforce system. The process and notification of interested persons through email is aligned with State of Montana public meeting laws and MTDLI policy.

The impact of this waiver to the state's WIOA performance, as well as any other related outcomes, will be collected and reported in the state's WIOA Annual Report. Looking forward, MTDLI will pursue more input from local elected officials to obtain feedback about this waiver request and history.

Montana has found success with minimal costs (1 comprehensive one-stop center) and a unified approach to the state's workforce development under the current waiver.

Request #3: Flexibility in Funding to Increase In-School Youth Enrollments

The State of Montana seeks to extend a waiver from the WIOA Section 129(a)(4)(A) and 20 CFR Part 681.410, which require not less than 75 percent of funds allotted to states under Section 127(b)(1)(C), reserved under Section 128(a), and available for statewide activities under subsection (b), and not less than 75 percent of funds available to local areas under subsection (c), shall be used to provide youth workforce investment activities for Out-of-School Youth (OSY). The state of Montana is requesting:

The flexibility to lower the minimum expenditure of 75% for OSY to 50% for Program Years 2026 and 2027.

There are currently no state or local statutory or regulatory barriers to implementing the requested waiver. Current State of Montana laws, regulations, and policies follow federal law, regulations, and guidance.

Governor Gianforte released the 406 JOBS year one workplan in 2025, reshaping and refocusing how Montana approaches workforce development. The plan encourages more pathways to work through pre-apprenticeship and credentialing opportunities and reduced barriers to employment by preparing workers for the labor market. Montana recognizes that career and technical education (CTE) personalized to each student provides not only the technical skills for occupational advancement but also a vision for the student(s) of what a successful career in industry can mean for the student. With this waiver, Montana aims to increase program participation and create program models that engage ISY in career and training opportunities, increasing employability before graduation.

Montana is also requesting to continue to operate under the current waiver which allows Montana youth service providers the flexibility to use Individual Training Accounts (ITAs) for WIOA ISY. The waiver impacts WIOA regulation 20 CFR 681.550 which prohibits ISY from utilizing ITAs. Without this waiver, only OSY, ages 16-24, can utilize ITAs. Montana is requesting the flexibility to allow the ITAs for ISY ages 16-21 to continue for PY 2026 and 2027. The coordination of these two waivers is a targeted strategy to expand Montana's ability to serve more of Montana's ISY and align with America's talent strategy of integrated systems with streamlined eligibility that advance education and workforce alignment. Serving ISY with ITAs while prioritizing industry-driven strategies will allow programs to enhance workplace preparedness for more of Montana's Youth.

Montana's original request of this waiver was in part intended to identify pathways to improve performance, including overall enrollment, by addressing challenges around accessing OSY populations that come in part from Montana's highly rural areas. Through this waiver Montana youth providers will have the flexibility to focus on reaching out to more in-school youth to assist in meeting their needs; ensuring they are working toward the successful completion and graduation from secondary and/or post-secondary education; increasing measurable skills gains and the credential attainment rate, median earnings and ultimately meeting employment retention rates after the 2nd quarter and 4th quarter. In PY2024, Montana saw a 22% increase in total Youth program enrollments and a growing share of expenditures towards ISY through the first half of PY2025. Additionally, Montana saw improved performance in Measurable skills gains in PY2024, the one performance measure that is not significantly lagged. Should any area or provider be identified as underperforming following a quarterly review, technical assistance will be immediately provided.

Through the adoption of the two requested waivers, removing the 25% cap on ISY costs and allowing for ITAs on ISY, Montana expects to see the following programmatic outcomes:

- An increase in total Youth program enrollment, driven by increased ISY enrollment.
- Increased use of work experiences, skills training (including pre-apprenticeship opportunities), and supportive services that better prepare ISY clients for entering the workforce upon completion of secondary school.
- In turn, greater adoption of these services will lead to improved second and fourth quarter employment rate, credential attainment, and measurable skills gain outcomes for the Youth program.

If the waiver is approved, anticipated beneficiaries include Montana's low-income, at-risk youth, and young adult population. Subcontracted WIOA youth service provider staff, workforce development partners, American Job Centers (AJC), parents, teachers, school counselors and Montana employers will also benefit from the greater ability to coordinate with the youth program and benefit from improved performance results. The strategy adopted through the use of these waivers will allow for innovative strategies to address employment barriers early, improve student retention, and ease transition out of secondary school into successful workforce outcomes. These strategies can include apprenticeship programs, short-term certificates, and pathways to other industry-recognized credentials or sustainable employment.

WIOA encourages strong partnerships to leverage resources and increase opportunities for youth. Montana has formed a Career Developer Team that coordinates with local schools and districts on workforce initiatives and strategies. Through the Career Developer team and efforts of Youth Program providers the system will connect applicable state and local agency efforts to assist youth, including at-risk youth, in leveraging resources. Aligning successful program models will lead to student persistence, retention, completion, career awareness, and employment opportunities.

Formal monitoring will be conducted by the entity designated by the SWIB. Montana DLI's Workforce Services Division Fiscal and Reporting Analysts will collect, analyze, and provide quarterly data and expenditure reports on the status of WIOA youth expenditures, as well as PIRL performance results identified in this waiver proposal. Montana's Youth program manager, WIOA Performance Analyst, and WIOA reporting analyst will monitor and review the achievement of program outcomes through a combination of quarterly desk reviews with providers, tracking of enrollments and service provision to participants, and observation of PIRL-reported quarterly performance outcomes. As needed technical assistance will be provided to ensure providers and case managers understand and utilize the flexibilities created by this waiver. Service providers will be monitored to verify eligibility for the Youth program. Guidance on the program's eligibility, the application, and related timeliness for reporting participant information is available in the WIOA Operations Manual.

A public comment period will be provided by including this waiver as part of Montana's WIOA Combined State Plan, to be posted for public comment on mid-cycle state plan updates between March 20, 2026 and April 27, 2026. The plan will be noticed to interested parties such as all SWIB members, the SWIB Interested Persons list, the Montana Association of Counties, the Montana League of Cities and Towns, local elected officials, service providers, organized labor, and other partners and stakeholders of the workforce system. The process and notification of interested persons through email is aligned with State of Montana public meeting laws and MTDLI policy.

Waiver Request #4 - Use of Individual Training Accounts for In-School Youth

The State of Montana is requesting continuation of an existing waiver to allow Montana's WIOA youth service providers to use Individual Training Accounts (ITAs) for in-school youth ages 16-21 for PY26 and PY27. The waiver impacts WIOA regulation 20 CFR 681.550 which prohibits youth providers from establishing Individual Training Accounts (ITAs) for WIOA in-school youth. There are currently no state or local statutory or regulatory barriers to implementing the requested waiver. Current State of Montana laws, regulations, and policies follow federal law, regulations, and guidance.

According to current WIOA regulations, ITAs are established on behalf of eligible clients to pay for approved training services. Allowing ITAs for in-school youth provides them the same opportunities for support as out-of-school youth. This will strengthen the opportunity for Montana students to earn industry-recognized credentials while in school, aligning with America's Talent Strategy's principal of worker mobility by connecting students with the workforce through these training opportunities. Montana's reengaged SWIB has identified that youth funds can be leveraged to better benefit Montana's in-school youth (ISY). By allowing for use of ITAs with ISY, the WIOA

Youth program can better support Montana's strategic goal of increasing industry recognized credential attainment during secondary school, boosting employability and preparedness for work upon entering the workforce.

Alongside this waiver request, Montana is requesting a waiver from Section 129(a)(4)(A) and 20 CFR 681.410 which require not less than 75 percent of funds allotted to states under Section 127(b)(1)(c), reserved under Section 128(a), and available for statewide activities under subsection (b), and not less than 75 percent of funds available to local areas under subsection (c), shall be used to provide youth workforce investment activities for OSY. These two waivers are expected to work together towards the following outcomes:

An increase in total Youth program enrollment, driven by increased ISY enrollment.

Increased use of work experiences, skills training (including pre-apprenticeship opportunities), and supportive services that better prepare ISY clients for entering the workforce upon completion of secondary school.

Improved second and fourth quarter employment rate, credential attainment, and measurable skills gain outcomes for Youth program participants.

This waiver will benefit retention, graduation, and credential attainment rates throughout both rural and urban communities. If the waiver is approved, anticipated beneficiaries include Montana's low-income, at-risk youth, and young adult population. Subcontracted WIOA youth service provider staff, workforce development partners, American Job Centers (AJC), parents, teachers, school counselors and Montana employers will also benefit from the greater ability to coordinate with the youth program and benefit from improved performance results.

Montana's 406 JOBS Initiative is pushing for sustainable public-private sector partnerships to create direct-to-industry workforce pipelines where workers are needed the most. These efforts will be accomplished in part through local sector partnerships and emphasis on apprenticeship and alternative career pathways, leaning on industry recognized credentials to prepare youth for the workforce. Montana has published and continues to update the Montana Credential Registry that makes attainable industry recognized credentials and stackable training opportunities apparent and searchable for this purpose. The initiative recognizes that career and technical education (CTE) personalized to each student gives them the technical skills for occupational advancement and a vision of what a successful career in industry can provide and local school boards in Montana have broad authority to declare flexible course equivalencies and free student seat time in favor of work-based learning opportunities leading to industry-credentialed learning.

The strategy adopted through the use of these waivers will allow for innovative strategies to address employment barriers early, improve student retention, and ease transition out of secondary school into successful workforce outcomes. The WIOA Title I Youth program manager will monitor implementation through the tracking of ITA use among in-school youth participants and provide technical assistance to program providers as needed to ensure these activities lead to the desired outcomes. Collection of the measurable waiver outcome information will be done through the EmployMT system through which Montana's Youth program providers operate the

program while outcome metrics will be computed in the systems through which Montana produces the required PIRL reports. Reports to track these outcomes will be produced quarterly.

Formal monitoring will be conducted by the entity designated by the SWIB, and the WIOA Title I youth program manager(s) will provide technical assistance to program providers regarding allowable uses of ITAs and youth funds under Montana’s requested waivers. Service providers are required to verify eligibility for the Youth program.

A public comment period will be provided by including this waiver as part of Montana’s WIOA Combined State Plan, to be posted for public comment on mid-cycle state plan updates between March 20, 2026 and April 27, 2026. The plan will be noticed to interested parties such as all SWIB members, the SWIB Interested Persons list, the Montana Association of Counties, the Montana League of Cities and Towns, local elected officials, service providers, organized labor, and other partners and stakeholders of the workforce system. The process and notification of interested persons through email is aligned with State of Montana public meeting laws and MTDLI policy.

TITLE I-B ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	Yes
2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program’s Disabled Veterans’ Outreach Program (DVOP) specialist;	Yes
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes

The State Plan must include	Include
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	Yes

The State Plan must include	Include
action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);	

Performance Goals for the Core Programs

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

Included below are the state’s expected levels of performance relating to the performance accountability indicator’s based on primary indicators of performance described in section 116(b)(2)(A) of the Workforce Innovation and Opportunity Act (WIOA).

Note: Performance targets for PY 2026 and 2027 will not be available before the conclusion of scheduled federal negotiations (TBD), which are anticipated to begin in April 2026. Per TEGL 11-19, Change 2, “With respect to the Effectiveness in Serving Employers (ESE) indicator, since it is a statewide measure that reflects a combined result across WIOA titles I, II, III, and IV programs, the Departments will jointly engage in negotiations with state representatives from all core programs.”

MTDLI has worked extensively on performance accountability pertaining to all Core programs. The work aligns with Pillar IV: Accountability: Ensuring federally funded workforce program deliver measurable results by linking investments to outcomes and enforcing performance discipline of the America’s Talent Strategy: Building the Workforce for the Golden Age.

The indicators of performance measure and evaluate the effectiveness of individual programs and the State’s workforce development system. These indicators are well aligned with the goals described throughout the State Plan and the 406 JOBS framework to allow our programs to measure how well they are serving participants and employers. Progress toward these indicators is evaluated against the performance targets negotiated by each program with their applicable federal agencies.

During Program Year 2024, MTDLI conducted technical assistance trainings pertaining to the performance indicators. Each quarter performance reports are analyzed by program staff and shared with providers that deliver the Core Programs. If any deficiencies are identified, changes are made to make sure the services are delivered appropriately and to make sure a return on investment is met on the federal funds spent.

In doing this, it was found that some providers needed in-depth technical assistance on the measures being used to gauge performance, particularly MSGs and credential attainment. MTDLI worked with providers to better inform on when and how to log performance, as well as the importance of strong results. Provided technical assistance on using the new EmployMT system. Performance improved among the youth providers. The other Core programs continue to meet and exceed performance indicators.

ADULT PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	71.0%	TBD	71.0%	TBD
Employment (Fourth Quarter After Exit)	69.0%	TBD	69.0%	TBD
Median Earnings (Second Quarter After Exit)	\$7,350	TBD	\$7,350	TBD
Credential Attainment Rate	53.0%	TBD	53.0%	TBD
Measurable Skill Gains	56.0%	TBD	56.0%	TBD

DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	72.5%	TBD	72.5%	TBD
Employment (Fourth Quarter After Exit)	70.0%	TBD	70.0%	TBD
Median Earnings (Second Quarter After Exit)	\$10,800	TBD	\$10,800	TBD
Credential Attainment Rate	57.0%	TBD	57.0%	TBD
Measurable Skill Gains	50.0%	TBD	50.0%	TBD

YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	63.0%	TBD	63.0%	TBD
Employment (Fourth Quarter After Exit)	58.6%	TBD	58.6%	TBD
Median Earnings (Second Quarter After Exit)	\$4,100	TBD	\$4,100	TBD
Credential Attainment Rate	50.0%	TBD	50.0%	TBD
Measurable Skill Gains	50.0%	TBD	50.0%	TBD

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

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

A. EMPLOYMENT SERVICE STAFF

1. DESCRIBE HOW THE STATE WILL STAFF THE PROVISION OF LABOR EXCHANGE SERVICES UNDER THE WAGNER-PEYSER ACT, SUCH AS THROUGH STATE EMPLOYEES, INCLUDING BUT NOT LIMITED TO STATE MERIT STAFF EMPLOYEES, STAFF OF A SUBRECIPIENT, OR SOME COMBINATION THEREOF.

Wagner-Peyser labor exchange services are provided by JSM staff, including but not limited to, state merit staff employees and staff of contracted service providers. Additionally, Business Engagement Specialists from MTDLI's Workforce Services Division deliver business-related services. These services are provided in-person as well as virtually (via video chat or phone). Self-service labor exchange services, including job search, career assessments, and other services are available to our customers via the CareerOneStop.org website. Customers without internet access that wish to self-serve can access JSM resource room computers.

2. DESCRIBE HOW THE STATE WILL UTILIZE PROFESSIONAL DEVELOPMENT ACTIVITIES FOR EMPLOYMENT SERVICE STAFF TO ENSURE STAFF IS ABLE TO PROVIDE HIGH QUALITY SERVICES TO BOTH JOBSEEKERS AND EMPLOYERS

Staff receive ongoing training on Wagner-Peyser program services. Training is provided face-to-face via webinar and/or recorded and stored online for staff to view at their convenience. Wagner-Peyser staff are cross trained on WIOA programs to maximize staff availability and ensure that job seekers and employers receive the best possible services. Each office has subject matter experts who train each other and conduct cross training in staff meetings. All staff understand WIOA Title I, Title II, III, and Title IV basic program eligibility criteria and how to make referrals to partner programs. Wagner-Peyser staff have the online tools needed during job seeker intakes and to assist in identifying possible referral options, including those to WIOA required partners. The following training sessions are available to JSM staff: business services; WIOA technical assistance; veteran services; Migrant Seasonal Farmworker services; H2A/H2B employer services, and various Wagner-Peyser service-related activities.

Identified training needs are developed and delivered internally or training is identified and provided externally. For example, specialized training is offered in assisting ex-offenders, business outreach, client intake, continuum of service to clients, documenting services delivered to job seekers and businesses, UI services, and RESEA. In-person training is offered statewide for Title I, II, III, and IV partners (including JVSG and other programs) to increase program knowledge across core partners and identify opportunities to refer and co-enroll clients.

When funding is available Wagner-Peyser staff can attain their certified workforce professional designation from the International Association of Workforce Professionals. They can also access Linked-In training to increase skills in a variety of different areas.

Montana's Wagner-Peyser staff provide customized business services designed to increase work-based learning opportunities, i.e., WIOA Title I-funded On-The-Job training (OJT) and IWT. Wagner-Peyser staff also connect local businesses to the MRAP staff. In addition, Montana seeks opportunities to help employers increase productivity, employee engagement, employee recruitment, retention, and training by implementing new programs and pilot projects.

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

Ongoing UI training is provided to Wagner-Peyser staff (including JVSG staff) and covers basic eligibility requirements, issue identification, fact-finding tools, work search requirements, and navigation of the UI Client Claims Portal. In addition, Wagner-Peyser staff receive ongoing training on required RESEA appointments, providing basic and individualized Wagner-Peyser services to job seekers and UI claimants. Wagner-Peyser staff and UI staff collaborated on Wagner-Peyser staff training focused on meaningful client assistance with the new UI Client Claims Portal, i.e., claims advice for clients and informative responses to their questions. After that training, a communication

channel was opened across Wagner-Peyser staff to keep current UI issues and updates in front of staff which helped expedite issues and clarify questions quickly.

B. EXPLAIN HOW THE STATE WILL PROVIDE INFORMATION AND MEANINGFUL ASSISTANCE TO INDIVIDUALS REQUESTING ASSISTANCE IN FILING A CLAIM FOR UNEMPLOYMENT COMPENSATION THROUGH ONE-STOP CENTERS, AS REQUIRED BY WIOA AS A CAREER SERVICE

Montana provides direct access to well-trained UI representatives in all JSM offices. An online portal for UI claimants is available on the MTDLI website that provides claimants with self-service functions. Workforce consultants throughout the state are trained to provide general UI assistance and information to customers regarding the processes around filing for unemployment compensation. Questions that require specific UI expertise are referred to the UI Claims Center for response.

In recent months, workforce consultants and UI designed and delivered training for Wagner Peyser staff, focusing on navigation of the new UI claimant portal and information about the related process. Training and communication are ongoing between UI and Wagner Peyser staff to clarify UI processes and improve understanding about how best to provide to assistance to individuals. Additionally, UI is working towards additional limited access to the UI claims system for Wagner Peyser staff. These developments will ultimately expand Montana's vision of meaningful assistance.

Additionally, in 2025 a pilot program was created in collaboration with UI and Job Service Wagner Peyser staff to better connect claimants virtually with a UI representative either immediately when possible or with a scheduled appointment. Three Job Service Offices have launched this in 2025 and further expansion is planned for 2026.

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

MTDLI continues to administer and ensure the provision of reemployment services to eligible UI claimants through the RESEA program described in the submission of the 2025 RESEA plan. Eighteen JSM offices located throughout the state use integrated, innovative tools, and online platforms to expand access to RESEA Services. This includes virtual RESEA appointments, workshops, and interactive training modules providing clients with a convenient and efficient way to access MTDLI programs. Through these services, Montana advances the Career Navigation pillar of the America's Talent Strategy by developing Individual Reemployment Plans (IRP), providing labor market informed career pathways, and connecting claimants to training, apprenticeships, and in-demand occupations.

RESEA staff at local JSM offices work with all UI claimants, except for job or union-attached individuals. They assist claimants in declining industries, ex-military individuals, and those at risk of becoming unemployed long-term. When additional resources are required to facilitate speedy reemployment, claimants are enrolled in the Wagner-Peyser program and referrals are made to more intensive retraining programs such as WIOA Dislocated Worker and Adult programs, or other state-operated programs. Participants receive timely, effective reemployment services that reduce

the duration of unemployment and connect individuals to in-demand occupations and registered apprenticeships.

MTDLI's strategy prioritizes a personalized approach, tailoring workforce services to address claimants' diverse needs. Customization of training or skill development empowers the individual to navigate their reemployment journey with confidence and supports reduced UI benefit durations and the opportunity to earn a self-sufficient wage. Career exploration efforts will focus on the six high-demand sectors as well as the four pathways to employment as outlined in the 406 JOBS Initiative, namely, health careers, construction trades, advanced manufacturing and computing, education and childcare, hospitality and recreation as well as financial and professional services. This individualized approach ensuring claimants gain the skill, support, and clear pathways needed to move into quality self-sufficient employment.

Job search and application assistance, job development contacts with employers, skills testing, labor market information, and online career assessments are routinely provided. JSM offers access to internet-connected computers with links to electronic job applications, unemployment insurance and work registration portals, resume and cover letter templates, and a variety of job search and career exploration links and tools.

The RESEA program also includes a comprehensive assessment of the claimant's current needs and development of an Individual Reemployment Plan (IRP), focusing on identification of barriers, career goals and the training needed to achieve long-term career success. Claimants may also receive comprehensive, specialized assessments and referrals to Adult Education, Job Corps, MRAP, or on-the-job training opportunities consistent with the Individual Reemployment Plan.

MTDLI continues to improve workforce and UI program integration. In August 2024 the UI division successfully transitioned to a modern UI system—Montana Unemployment Service Enterprise (MUSE). This investment will serve RESEA clients more efficiently and help MTDLI evaluate RESEA more thoroughly in the future.

MTDLI launched a RESEA webpage for claimants who have an appointment for services. The website addresses common questions about RESEA and provides resources about virtual meetings and points of contact. A reminder, by email or phone call, occurs 7-10 days in advance of an appointment. MTDLI monitors no show rates and is researching additional ways to improve known issues associated with the online platforms as reported by claimants and JSM staff. JSM offices make computers and webcams available to claimants without technology tools at home. MTDLI also utilizes an 888 number dedicated to rescheduling or general appointment-related questions.

Beginning in Program Year 2026, MTDLI plans to introduce subsequent RESEA appointments as an evidence-informed engagement strategy. These follow-up meetings will reinforce progress toward goals identified in the Individual Reemployment Plan, support sustained job search activity, and provide additional opportunities to address barriers to employment. The state anticipates these touchpoints will improve reemployment outcomes and reduce the likelihood of long-term unemployment while strengthening program effectiveness.

Integration strategies include training RESEA staff to identify UI eligibility issues, and strengthening coordination procedures ~~for all~~ with JSM staff and UI staff to ensure individuals receiving UI assistance obtain timely and high quality 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:

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

MTDLI provides Wagner-Peyser labor exchange services through JSM staff, including but not limited to state merit staff employees and staff of contracted service providers. Additionally, Engagement Specialists from the Workforce Services Division deliver business-related services. Wagner-Peyser funds will be used to support UI claimants by providing job search and placement services, including counseling, testing, occupational and LMI, assessment and referral to employers as well as 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. Wagner-Peyser funds will be used to administer the work test for the state's unemployment compensation system; provide job finding and placement services for unemployment insurance claimants; and provide unemployment insurance claimants with referrals to, and application assistance for, training and education resources and programs. These services are provided in-person as well as virtually (via video chat or phone).

MTDLI's Workforce Services Division (WSD) coordinates with the UI Division to support UI claimants. In 2023, MTDLI deployed a new online claimant portal, which streamlines the claimant process. Wagner-Peyser staff were included in the development, testing, and training phases of the claimant portal to ensure that deployment was minimally disruptive for claimants, and that local JSM staff were able to provide assistance using the new portal. UI and WSD continue to partner to improve the claimant process, ensure program integrity, and connect claimants with labor exchange services.

2. REGISTRATION OF UI CLAIMANTS WITH THE STATE'S EMPLOYMENT SERVICE IF REQUIRED BY STATE LAW;

JSM staff work with all UI claimants, except for job or union-attached claimants. To receive UI benefits, claimants must register to create an OKTA account (state single sign-on account) at [Home - MUSE | Claimant Center](#).

In Montana, UI claimants must meet ongoing job search requirements and eligibility guidelines detailed in the claimant handbook: [Claimant Handbook: A Guide to Unemployment Insurance Benefits](#)

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, veteran claimants, and those at risk of becoming long-term unemployed through RESEA. The program includes an orientation to services available at the office and a comprehensive assessment of the claimant's current situation and development of an individual employment plan, which includes the following:

- identification of barriers;
- identification of career and employment goals;
- understanding the local labor market related to employment goals; and
- identification of training needed to achieve employment.

The RESEA program, which is currently undergoing a formal evaluation of virtual services, aligns UI and workforce service resources to best serve clients. Statewide delivery of intensive, personalized reemployment services results in reduced UI benefit durations.

Staff focus on providing career services that respect the specific needs of each claimant. The assessment and referrals to reemployment services provided to UI claimants focus on identifying high-demand jobs and training opportunities available locally or regionally, that can lead to higher paying, long-term jobs. Staff in each JSM are trained and skilled in performing assessments, supporting claimants in local LMI 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.

MTDLI recently updated their UI claimant portal, is building a new integrated workforce client system, and moving to a statewide cloud-based data solution to streamline service coordination across state agencies.

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

WIOA core partner trainings conducted in 2023 across the state assured staff across core programs were able to gain an increased understanding of program eligibility and opportunities to co-enroll and provide more comprehensive training and resource connections for UI claimants.

E. AGRICULTURAL OUTREACH PLAN (AOP). EACH STATE AGENCY MUST DEVELOP AN AOP EVERY FOUR YEARS AS PART OF THE UNIFIED OR COMBINED STATE PLAN REQUIRED UNDER SECTIONS 102 OR 103 OF WIOA. THE AOP MUST INCLUDE AN ASSESSMENT OF NEED. AN ASSESSMENT NEED DESCRIBES THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

1. ASSESSMENT OF NEED. PROVIDE AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS IN THE AREA BASED ON PAST AND PROJECTED AGRICULTURAL AND FARMWORKER ACTIVITY IN THE STATE. SUCH NEEDS MAY INCLUDE BUT ARE NOT LIMITED TO: EMPLOYMENT, TRAINING, AND HOUSING.

Many basic family needs such as nutrition, housing, health care, childcare, and transportation are out of reach for farm worker families. As such, Montana is committed to coordinating services for Migrant and Seasonal Farmworkers (MSFWs) across partners to ensure they receives the same services and supports that all clients using the public workforce system receive.

Rural Employment Opportunities (REO) has partnerships with the Montana Food Bank and provides food and gas assistance to MSFWs traveling in both eastern and western migrant streams. In addition, REO can provide limited emergency housing and works with agencies to find housing for MSFWs. Many MSFWs have limited English proficiency and REO provides translation services to help MSFWs navigate barriers to additional assistance and services. Translation services are available through Job Service Montana (JSM) as well.

Most Montana farm workers earn low wages based on various factors. In addition, many farm worker families need housing, health care, childcare, transportation, and a sufficient nutritional food supply. For more information on these, see <https://lmi.mt.gov>.

The cost of housing in Montana has increased rapidly in the last couple years. This makes it tough for farmers and ranchers trying to find employees because they may not be able to purchase a home in or around the area of work. Healthcare is accessible throughout Montana, but when a farmer or rancher must travel up to two hours or more to receive care it can affect the daily operations on the farm or ranch. Childcare is another area where services are not always available or priced too high if available. Because of the rural nature of Montana, many services are a considerable distance away which makes access more challenging to travel to and from to get these services since gas prices were considerably higher in the last couple of years.

Information received from REO, Montana's grantee for the USDOL-funded National Farmworker Jobs Program (NFJP), indicates that during this four-year grant cycle ending in July 2024, they served an average of 50 seasonal farm workers and /or their dependents under the NFJP grant per year. The total number served in training and direct placement is just over 200 individuals. Migrant farm workers, defined by the NFJP definition of having to travel far enough to work that they cannot travel home each night, are served statewide and generally assisted with food and gas. REO serves between 250 and 300 unduplicated migrant families in the Flathead area each year, for a total of between 600 - 800 individuals served. Additionally, REO serves 40-60 families in Eastern Montana, specifically in the Billings/Hardin area.

Based on participant information from those seeking training services, the average annual income for a participant is from \$27,000 - \$31,000 annually. This calculation is based on full-time work, and many are not employed full-time. A more accurate figure is \$20,200 annually.

For those individuals interested in training, individuals can choose to stay in agriculture and upgrade their skills so that they might be able to work more hours or full-time, i.e., an individual

who completes a CDL course or obtains a welding certificate or diesel mechanics degree. They can also choose to leave agriculture and enter another profession. MTDLI can help the spouse or dependent children with training and/or college programs. Much of farmworker income comes from the farm and many farm workers who have benefits get them through spouses' off-site jobs.

The WIOA Adult Program manager and REO outreach staff partnered to coordinate the enrollment activities of MSFWs, reducing the burden of duplicative meetings for those workers. JSM outreach staff and REO's outreach workers coordinate whenever possible to improve and enhance services to MSFW's.

MOUs exist between the SMA and REO, as well as MTDLI / Foreign Labor Program and Ag Worker Health and Services which focus on coordination of services, reducing barriers for migrant and seasonal farmworkers surrounding eligibility, enrollment, and acquiring services.

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

Montana is the fourth largest state in the nation, with a land mass of over 147,000 square miles. Montana's five economic regions have varied agriculture mixes of labor-intensive crops with different hiring and peak seasons based on the production within that region. Montana's economic regions with their corresponding prime agricultural and/or crop activity are as follows:

Northwest Region:

In Montana's Northwest Region, the predominant crops are sweet cherries, alfalfa, and hay. The earliest activity involves planting alfalfa and the hiring season for MSFWs typically lasts from June to September. Cherry harvest, which is particularly labor-intensive, begins in mid-July and ends in early August.

Southwest Region:

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

North Central Region:

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

South Central Region:

In Montana's South-Central Region, the predominant crops are wheat and barley. However, cattle and sheep operations are also predominant. The typical hiring season for calving and lambing lasts from February to late spring. Throughout the year, approximately 33 families are served within the region.

Eastern Region:

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

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

3. AN ASSESSMENT OF THE UNIQUE NEEDS OF FARMWORKERS MEANS SUMMARIZING MIGRANT AND SEASONAL FARM WORKER (MSFW) CHARACTERISTICS (INCLUDING IF THEY ARE PREDOMINANTLY FROM CERTAIN COUNTRIES, WHAT LANGUAGE(S) THEY SPEAK, THE APPROXIMATE NUMBER OF MSFWS IN THE STATE DURING PEAK SEASON AND DURING LOW SEASON, AND WHETHER THEY TEND TO BE MIGRANT, SEASONAL, OR YEAR-ROUND FARMWORKERS). THIS INFORMATION MUST TAKE INTO ACCOUNT DATA SUPPLIED BY WIOA SECTION 167 NATIONAL FARMWORKER JOBS PROGRAM (NFJP) GRANTEE, 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

The estimated number of agricultural workers, based on USDA Agriculture Census and other source data, shows little change between peak season and low season employment of farm workers, as most Montana agricultural workers are not from the migrant community. The predominant demographic of a Montana agricultural worker is a Montana resident who does not travel significant distances for seasonal or temporary work or is year-round employee and is English-speaking. This increased the rate of the foreign labor H-2A program applications to approximately 25% to 30% from one year to the next.

Historically the largest number of foreign workers have been Spanish speakers, coming from Mexico and several central American countries. Currently, an increasing number of workers are from South Africa and primarily speak English and French.

4. OUTREACH ACTIVITIES

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

Experienced and knowledgeable outreach staff are located in JSM offices in communities where the highest amount of regional agricultural activity takes place. Outreach workers are trained in JSM office procedures, informal resolution of complaints, and in MSFW services, benefits, and protections. The following resources are readily available: brochures for local health clinics, information on the complaint system, directions and brochures for the local SNAP and TANF public assistance office, upcoming opportunities for occupational trainings, contact information for the local ag health and services offices, childcare information, 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.

Statewide outreach staff conduct the following activities throughout the year:

- Educating MSFWs on rights with respect to terms and condition of employment;
- Developing and maintaining links between MSFWs, JSM, public and private community agencies, MSFW groups and employers;
- Coordinating outreach efforts with MSFW community service providers and referrals to supportive services;
- Assisting with the completion of the worker registration, resumes, job applications, and other documents as needed;
- Helping with unemployment insurance claims, job search assistance, and referrals to specific employment opportunities if MSFWs are unemployed;
- Providing information about current and future employment opportunities, including posting job orders and informing MSFWs about available H-2A job orders; and

Informing MSFWs of the complaint system and helping with filing and processing complaints.

In addition, the State Monitor Advocate (SMA) provides technical assistance, including formal annual training, program updates, responses to questions, and improvements in service delivery. Staff members are directed to complete online outreach and MSFW training modules on the WorkforceGPS website. Additional mini trainings are sent to all MSFW staff, covering the following subjects:

- Ag Worker Health & Services
- Montana Legal Services Association
- Defining MSFWs

- MSFW Outreach
- MSFW Outreach Log
- Rural Economic Opportunities services to MSFWs
- Human Trafficking
- Sexual Harassment in the Workplace
- OSCC Complaint System
- Agricultural Employer Outreach

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

MTDLI submits a combined response for e.4. A-E.

Experienced and knowledgeable outreach staff are located in JSM offices in communities where the highest amount of regional agricultural activity takes place. Outreach workers are trained in JSM office procedures, informal resolution of complaints, and in MSFW services, benefits, and protections. The following resources are readily available: brochures for local health clinics, information on the complaint system, directions and brochures for the local SNAP and TANF public assistance office, upcoming opportunities for occupational trainings, contact information for the local ag health and services offices, childcare information, 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.

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- Developing and maintaining links between MSFWs, JSM, public and private community agencies, MSFW groups and employers;
- Coordinating outreach efforts with MSFW community service providers and referrals to supportive services;
- Assisting with the completion of the worker registration, resumes, job applications, and other documents as needed;
- Helping with unemployment insurance claims, job search assistance, and referrals to specific employment opportunities if MSFWs are unemployed;
- Providing information about current and future employment opportunities, including posting job orders and informing MSFWs about available H-2A job orders; and

- Informing MSFWs of the complaint system and helping with filing and processing complaints.

In addition, the State Monitor Advocate (SMA) provides technical assistance, including formal annual training, program updates, responses to questions, and improvements in service delivery. Staff members are directed to complete online outreach and MSFW training modules on the WorkforceGPS website. Additional mini trainings are sent to all MSFW staff, covering the following subjects:

- Ag Worker Health & Services
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- Defining MSFWs
- MSFW Outreach
- MSFW Outreach Log
- Rural Economic Opportunities services to MSFWs
- Human Trafficking
- Sexual Harassment in the Workplace
- OSCC Complaint System
- Agricultural Employer Outreach

B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH STAFF. TECHNICAL ASSISTANCE MUST INCLUDE TRAININGS, CONFERENCES, ADDITIONAL RESOURCES, AND INCREASED COLLABORATION WITH OTHER ORGANIZATIONS ON TOPICS SUCH AS ONE-STOP CENTER SERVICES (I.E. AVAILABILITY OF REFERRALS TO TRAINING, SUPPORTIVE SERVICES, AND CAREER SERVICES, AS WELL AS SPECIFIC EMPLOYMENT OPPORTUNITIES), THE EMPLOYMENT SERVICE AND EMPLOYMENT-RELATED LAW COMPLAINT SYSTEM (“COMPLAINT SYSTEM” DESCRIBED AT 20 CFR 658 SUBPART E), INFORMATION ON THE OTHER ORGANIZATIONS SERVING MSFWS IN THE AREA, AND A BASIC SUMMARY OF FARMWORKER RIGHTS, INCLUDING THEIR RIGHTS WITH RESPECT TO THE TERMS AND CONDITIONS OF EMPLOYMENT.

This is addressed in the Outreach Activities initial section e.4.A

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

Experienced and knowledgeable outreach staff are in every JSM office. Outreach workers are trained in JSM office procedures, informal resolution of complaints, and in MSFW services, benefits, and protections. The following resources are readily available: brochures for local health clinics, information on the complaint system, directions and brochures for the local SNAP and TANF public assistance office, upcoming opportunities for occupational trainings, contact information for the

local ag health and services offices, childcare information, 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. Posters that highlight the complaint system and how to access it are prominently displayed in each JSM office, in both English and Spanish. In keeping with federal regulations, contacts are clearly identified to simplify the process for any worker who needs to access the Complaint System.

Statewide outreach staff conduct the following activities throughout the year:

- Educating MSFWs on rights with respect to terms and condition of employment;
- Developing and maintaining links between MSFWs, JSM, public and private community agencies, MSFW groups and employers;
- Coordinating outreach efforts with MSFW community service providers and referrals to supportive services;
- Assisting with the completion of the worker registration, resumes, job applications, and other documents as needed;
- Helping with unemployment insurance claims, job search assistance, and referrals to specific employment opportunities if MSFWs are unemployed;
- Providing information about current and future employment opportunities, including posting job orders and informing MSFWs about available H-2A job orders; and
- Informing MSFWs of the complaint system and helping with filing and processing complaints.

In the upcoming year, Montana will expand on training opportunities for core partners to increase awareness and knowledge of the services and resources available to migrant and seasonal farm workers. These will be conducted in partnership with the trainings for JVSG and other efforts to closely align services and coordinate clients' continuum of support, including but not limited to WIOA title II Adult Education and Family Literacy and Title IV Vocational Rehabilitation. WorkforceGPS training modules and one-on-one program training will help core partners understand MSFW needs and in return, Montana will partner to provide services to MSFWs in a more holistic way. Training efforts will also include WorkforceGPS training modules on outreach to MSFWs. Montana will include Unemployment Insurance partners on one-on-one trainings and in our recurring technical assistance rotation to expand understanding of agricultural employment in Montana. Montana state law has exemptions for agricultural employment, limiting training opportunities in the past.

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

This is addressed in the Outreach Activities initial section e.4.A

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

Montana coordinates outreach with the following partners:

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

REO is Montana's National Farmworker Jobs Program (NFJP) grantee. There is a formal MOU between REO and the state of Montana defining roles and responsibilities and service coordination for Migrant and Seasonal Farmworkers (MSFWs). REO has staff located throughout the state who partner with the WIOA Title I service providers to coordinate services and outreach to MSFWs.

Each of the partner agencies attend statewide training to discuss services and opportunities to collaborate on outreach efforts and share promising practices. Statewide trainings are designed for partner engagement, strengthening relationships and improving service to MSFWs. Training is developed collaboratively across partners and include presentations and networking opportunities with Montana's three primary MSFW partner agencies: REO, Montana Legal Services Association, and Ag Worker Health and Services.

MTDLI collaborates with REO in additional ways. REO has field staff located in JSM offices, serving individuals statewide. The agreement between the MTDLI and REO requires coordinated services, including outreach activities. REO staff conduct regular outreach activities, according to their contract with the U.S. Department of Labor. This results in individuals' co-enrollment in additional programs offered through JSM or community-based organizations. The REO staff also conduct outreach to employers on a regular basis, resulting in on the job training and work experience opportunities for qualifying MSFWs. Outreach provides MSFWs with the skills and education necessary to become employed full-time and economically self-sufficient. Through this partnership, Montana served members of the agricultural community who are otherwise not identified solely by JSM staff. 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.

In 2023, MTDLI had an introductory meeting and established a partnership with the Consulate of Mexico's Boise office. MTDLI shared information and explored opportunities to coordinate and collaborate services and outreach to MSFWs. Montana learned about the consulate's mobile clinics and opened channels to explore future opportunities to share and expand resources to improve services. In the coming year, there will be more opportunities for MTDLI to engage with the consulate during their outreach events in Montana, as well as other agencies working with MSFWs.

MTDLI continues to explore opportunities and identify groups, agricultural meetings, and convenings where it can establish, expand, and enhance the opportunity to improve outreach to MSFWs. There are inherent challenges due to JSM's office hours not aligning with times and locations where MSFW's typically meet or congregate. This create barriers to outreach. Weekend church, laundry businesses, and grocery stores are often setting where workers might gather. During the past 2-3 years, the JSM Bureau Chief authorized work-day flexibility for JSM's outreach

staff. Changes in leadership have necessitated renewed conversations about whether this flexibility is still an option.

MTDLI also partners with Montana's Department of Agriculture. Staff from the Department of Agriculture presented at annual trainings, sharing information about relevant programs. For example, Agriculture in the Classroom, instills an appreciation for local agriculture and food production, offering timely, accurate, and integrated standards-based curriculum through "hands on, minds on" activities. Topics include pollinators, noxious weeds, rangelands, invasive species, and garden science. Farmers markets throughout Montana play a valuable role in promoting healthy communities. Shoppers enjoy the freshness and taste of locally grown foods and vendors capture greater value for their products from direct sales to customers which circulates money through the local economy. MTDLI provided resources for Department of Agriculture staff to use at their training or events.

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

Describe the State agency's proposed strategies for:

A. PROVIDING THE FULL RANGE OF EMPLOYMENT AND TRAINING SERVICES TO THE AGRICULTURAL COMMUNITY, BOTH FARMWORKERS AND AGRICULTURAL EMPLOYERS, THROUGH THE ONE-STOP DELIVERY SYSTEM. THIS INCLUDES:

I. HOW CAREER AND TRAINING SERVICES REQUIRED UNDER WIOA TITLE I WILL BE PROVIDED TO MSFWS THROUGH THE ONE-STOP CENTERS

II. HOW THE STATE SERVES AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH SERVICES

MTDLI established a Migrant and Seasonal Farmworker policy that describes the provisions and requirements to deliver quality employment and training services through JSM, outreach activities, and the MSFW State monitor advocate. The full range of services provided to Migrant Seasonal Farm Workers (MSFW) are identical to those available to all individuals accessing through JSM.

Similarly, JSM staff meet the workforce needs of agricultural employers through recruitment and customized services to employers on an individual and as-needed basis. This includes registering job seekers for employment services; posting job openings online as well as in the offices; tracking services provided to job seekers and employers; and tracking referrals made to job openings.

Outreach workers also provide the following service to agricultural employers:

- Locate and refer qualified MSFWs to fill the labor needs of agricultural employers;
- Encourage agricultural employers to publish their job openings using MTDLI's management information system to fill job openings;
- Provide labor market information; i.e., supply and demand, salaries, training requirements, new and emerging occupations, and industry growth; and

- Provide Rapid Response services as the result of a planned closure or mass layoffs.

Additionally, REO provides employers with reimbursement of up to 75% of a participant's wages during a contracted work experience or On-the-Job Training (OJT).

B. MARKETING THE EMPLOYMENT SERVICE COMPLAINT SYSTEM TO FARMWORKERS AND OTHER FARMWORKER ADVOCACY GROUPS

MTDLI informs and trains all JSM staff and agency partners on the Complaint System's procedures annually or as needed or requested. All trained staff must accept a complaint.

Posters are prominently displayed in each office, in English and Spanish to increase awareness and ease access to the contact person in each office, as well as the State Monitor Advocate.

MSFW partner organizations such as Rural Employment Opportunities (REO), NFJP grantee; Montana Legal Services Association; and Ag Worker Health and Services are aware of the Complaint system and do made referrals to or inquire about how to access the Complaint System.

Additional opportunities for awareness and access exist with the Mexican Consulate whose staff hosts outreach events in Montana. In addition, consulate staff engages other groups to work with migrant and seasonal farm workers.

Information about the Complaint System is available at an annual Cherry Harvest event, which occurs in Polson on Flathead Lake. Polson's JSM host a table where information is readily available for MSFWs about the Complaint System and a full spectrum of services available to any job seeker. At the end of July 2024, depending on the cherry harvest, MTDLI will prominently display newly released posters to raise awareness.

C. MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM FOR U.S. WORKERS (ARS) TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

JSM's employment specialists and outreach staff inform agricultural employers about Montana's agricultural recruitment system, as well as the process for posting and processing intrastate and interstate agricultural job orders.

6. OTHER REQUIREMENTS

A. COLLABORATION

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

MTDLI has a formal MOU in place with REO to coordinate and collaborate on MSFW services. In addition, Montana's primary MSFW partners—REO, Montana Legal Services Association, and Ag Worker Health and Services—attend statewide training to discuss services and outreach efforts and share promising practices, strengthen relationships, and improve MSFW services.

B. REVIEW AND PUBLIC COMMENT

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons; therefore, and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.

The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

The AOP was shared with the SWIB and NFJP grantee, REO, giving them the opportunity to comment. It was also available for public review and comment between March 11, 2022 – April 11, 2022. (There were no comments received on AOP during this public comment period.) The AOP, comments received, and responses to the comments will be provided to the SWIB for approval.

C. DATA ASSESSMENT

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

Montana's previous four years of Wagner-Peyser performance data indicate that 100% of MSFWs received staff assisted services. Montana is working to improve the management information system that provides for much of the performance data.

MTDLI's SMA met all quarterly reporting requirements for LEARS and various reports specific to regional and national Monitor Advocates. In addition, MTDLI works closely with the WSD reporting analyst to identify and address reporting issues that come up on a quarterly basis.

MTDLI continues to work with our regional MA, looking for ways to ensure reporting of services is accurate and timely. The SMA also provides annual and ongoing technical assistance and training on all the MSFW performance indicators to staff who serve MSFWs and conduct outreach and other activities.

In reviewing reports based on PIRL and WIPS data related to "Equity Ratio Indicators", the percentage of farmworker receiving basic career services was within 1.10% of non-MSFWs. In the

category “Received Staff Assisted Job Search Activities,” MTDLI notes 60.7% for MSFWs vs. 47.9% for non-MSFWs. Also exceeding the percentage in “Referred to Employment” are 35.7% MSFWs vs. 18.4% non-MSFWs and “Referred to Federal Training” 25.7% MSFWs vs. 16.9% non-MSFWs. “Received UI Claim Assistance” was even at 52.9% for each.

Two categories where MSFWs were below non-MSFWs were “Received Individual Career Services” at 37.2% for non-MSFWs vs. 28.6% for MSFWs and “Received Staff-assisted Career Guidance Services” at 15.6% for non-MSFWs vs. 12.1% for MSFWs.

A contributing factor to consider is the relatively low numbers of MSFWs who visit JSM offices and are enrolled as participants/job seekers. Montana’s numbers have always been historically low.

Through a new partnership with the Mexican Consulate in Boise, MTDLI learned that there are pockets of migrant workers (especially those of Mexican descent who seek services when the consulate provides mobile services in Montana) who may never seek assistance through a JSM office.

Under the category of Minimum Service Level Indicators, “Individuals Placed in a Job” data indicates MSFWs at 70% vs. non-MSFWs at 66.77%. In “Individuals Placed in Long Term Non-Agricultural Jobs,” MSFWs were slightly lower at 53.33% vs. 54.77% for non-MSFWs. “Employment Rate 4th Quarter after Exit” reflects 71.01% for MSFWs vs. 66.90% for non-MSFWs.

Data analysis for other periods of time during a 4-year review demonstrate very similar numbers.

Despite there being a relatively low number of MSFWs that are registered job seekers in Montana’s data system, MTDLI is confident that those who do enter an JSM office do receive the full array of employment services, benefits, and protections in a manner that is qualitatively equivalent and quantitatively proportionate to those provided to non-MSFWs. This is due to a holistic approach—every job seeker is treated equally when they seek services through a JSM office.

Leadership at MTDLI would like to request additional technical assistance on the data reporting process to fully understand the expectations on analysis regarding quantitatively proportionate services and can assure coordination between SMA, performance analysts, and other agency staff to assure Montana meets our goals and is able to improve provision of services in any areas where goals are not being met.

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.

Between 2022 and 2024, MTDLI underwent a change in leadership and a reorganization. As part of this process, it was determined that MSFW focus should include reinforcing our partnership and collaborative opportunities with REO—the NFJP grantee—and providing more flexibility for JSM staff to conduct outreach in additional locations and during alternative hours outside the M-F work week. MTDLI also seeks to improve their understanding and analysis of LEARS and other relevant data. This one goal that has not been achieved and will be an area of focus for the coming years

including a request for TA, training for MSFW staff by MTDLI data analysts, and development of a formal schedule and process for analysis.

Montana has also focused on the following activities and priorities, all of which have been successful.

JSM continues to provide the full range of labor exchange services under Wagner Peyser and pertinent data reported through PIRL, LEARS, and other reports confirms equitable percentages and adheres to the added-value requirements such as outreach to inform customers of services, including MSFWs. Of the 17 JSM offices across Montana, those located in rural and agricultural areas work together with the SMA to enhance outreach and ag-related services. MTDLI believes these are areas in the 2022 AOP that have been fulfilled.

Montana continues to meet the quarterly reporting requirements and will continue to work with our regional MA to look for ways to ensure services are being delivered accurately and timely, adjusting where needed. MTDLI values the working relationship with WIOA core partners, AOP partners, and federal partners to ensure services are delivered. Any working relationship that must be addressed and enhanced to improve partnerships are welcomed and encouraged to make sure Montana's agricultural communities are receiving the best services.

The SMA serves on the Board of Directors for National Farmworker Jobs Program Grantee, Rural Employment Opportunities. Events such as Cherry Harvest—an outreach event coordinated by REO but attended by other MSFW partner agencies, Ag Worker Health and Services, Montana Legal Services Association and other local agencies—are opportunities for collaboration and coordination of services and solidarity. The SMA attends Cherry Harvest. This weeklong event is held in late July or early August, depending on the cherry crop and subsequent harvest.

The WIOA Adult Program Manager and REO outreach staff partnered together to coordinate enrollment activities of MSFWs to reduce the burden of duplicative meetings for those workers. JSM outreach staff and REO outreach workers coordinate whenever possible to improve and enhance services to MSFWs.

MOUs between the SMA and REO, as well as MTDLI's Foreign Labor Program and Ag Worker Health, coordinated services and reduced barriers for MSFWs related to eligibility, enrollment, and services.

In 2023, MTDLI attended an introductory meeting with the Mexican Consulate in Boise, establishing a partnership to share information and explore opportunities to coordinate and collaborate on outreach and services. MTDLI learned of the consulate's mobile clinics and opened channels to explore future opportunities to share and expand resources.

MTDLI continues to explore opportunities, groups, agricultural meetings and convenings to establish, expand, and enhance outreach to MSFWs. There are inherent challenges when the normal office hours of JSM staff does not align with times and locations where MSFWs would typically meet or congregate. MSFWs may gather at church, at a laundry, or grocery stores which are often activities conducted outside usual working hours. Outside of these specific efforts, JSM

staff with outreach responsibilities do coordinate and collaborate with outreach workers in partner agencies whenever and wherever possible.

MTDLI monitors JSM offices, both in person and remotely, to ensure that staff are fully cognizant of the responsibility to ensure that MSFWs receive services, benefits, and protections in a manner that is both qualitatively equivalent and quantitatively proportionate to services provided to non-MSFWs

There is signage in each JSM office, in English and Spanish, about the Complaint System. These are posted conspicuously in each office to ensure that MSFWs are fully aware of the rights and services available to them.

Annual training, which includes pre-occupancy housing inspections, MSFW outreach, access to the Complaint System, opportunities for partnership and collaboration with NFJP grantees and other partner agencies that serve MSFWs, is conducted for all JSM staff with foreign labor responsibilities. In addition to this annual training, online resources are available for new staff and as refreshers for existing staff. New hires with related responsibilities are invited to review these resources and technical assistance is available as needed or requested.

The Foreign Labor Certification Program Manager and State Monitor Advocate participate in available training and conferences as well as regional cohort meetings with their peers to discuss best practices and share challenges and lessons learned to improve services to MSFWs.

E. STATE MONITOR ADVOCATE

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

The SMA also serves as the State Workforce Agency (SWA) designee, overseeing JSM agricultural operations to ensure that SFWs receive employment services, equal in both quality and quantity to employment services provided to non-MSFWs.

The SMA promotes the needs and concerns of MSFWs to MTDLI leadership. Additionally, the SMA reviews and comments on directives and policy changes that affect the MSFWs. MTDLI has duly afforded the SMA the opportunity to comment on the Agricultural Outreach Plan as required by Title 20 CFR part 653.111(h).

The SMA has reviewed and approved the AOP.

WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this	Yes

The State Plan must include	Include
requirement within a reasonable amount of time (sec 121(e)(3));	
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	Yes
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and	Yes
4. SWA officials: <ul style="list-style-type: none"> 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been discontinued; 4) Approve corrective action plans; 5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days; 6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and 7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing. 	Yes
5. The SWA has established and maintains a self-appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance (20 CFR 658.601).	Yes

WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

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

Included below are the state’s expected levels of performance relating to the performance accountability indicator’s based on primary indicators of performance described in section 116(b)(2)(A) of the Workforce Innovation and Opportunity Act (WIOA).

Note: Performance targets for PY 2026 and 2027 will not be available before the conclusion of scheduled federal negotiations (TBD), which are anticipated to begin in April 2026. Per TEGL 11-19, Change 2, “With respect to the Effectiveness in Serving Employers (ESE) indicator, since it is a statewide measure that reflects a combined result across WIOA titles I, II, III, and IV programs, the Departments will jointly engage in negotiations with state representatives from all core programs.”

MTDLI has worked extensively on performance accountability pertaining to all Core programs. The work aligns with Pillar IV: Accountability: Ensuring federally funded workforce program deliver measurable results by linking investments to outcomes and enforcing performance discipline of the America’s Talent Strategy: Building the Workforce for the Golden Age.

The indicators of performance measure and evaluate the effectiveness of individual programs and the State’s workforce development system. These indicators are well aligned with the goals described throughout the State Plan and the 406 JOBS framework to allow our programs to measure how well they are serving participants and employers. Progress toward these indicators is evaluated against the performance targets negotiated by each program with their applicable federal agencies.

During Program Year 2024, MTDLI conducted technical assistance trainings pertaining to the performance indicators. Each quarter performance reports are analyzed by program staff and shared with providers that deliver the Core Programs. If any deficiencies are identified, changes are made to make sure the services are delivered appropriately and to make sure a return on investment is met on the federal funds spent.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	67.0%	TBD	67.0%	TBD

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Fourth Quarter After Exit)	67.0%	TBD	67.0%	TBD
Median Earnings (Second Quarter After Exit)	\$7,400	TBD	\$7,400	TBD
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable

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

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

A. ALIGNING OF CONTENT STANDARDS

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

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

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

The adoption of the CCR Standards drives adult education professional development, acquisition of textbook and technology-based resources, and the selection of formative and summative

assessments. Aligning adult education standards with the Montana Content Standards provides all adult students with the same academic opportunity to be prepared for employment or postsecondary training without remediation. Eligible providers will utilize curricular frameworks for the standards that take into account academic requirements for non-credit bearing courses in postsecondary and occupational standards. The eligible provider will ensure that all teachers have implemented, or will implement standards-based education, and agree to participate in ongoing professional development that supports standards-based education.

B. LOCAL ACTIVITIES

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;
- English language acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training that—
 - 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
 - It is for the purpose of educational and career advancement.

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

activities for eligible individuals.

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

1. Adult education;
2. Literacy;
3. Workplace adult education and literacy activities;
4. English language acquisition activities;
5. Integrated English literacy and civics education;
6. Workforce preparation activities; or
7. Integrated education and training.

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

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

WIOA [§463.24] mandates that an applicant must demonstrate past effectiveness in providing adult education and literacy activities before that applicant can be considered an eligible applicant. All grant applications will be pre-screened prior to review to determine if the applicant agency meets the standard of demonstrated effectiveness to be considered eligible for an award." As part of the application documents submitted, all interested applicants must submit data covering a two-year period, which includes:

1. The total number of individuals served; and
2. Demonstrates the applicant's effectiveness in providing adult education and literacy activities. Areas of demonstrated effectiveness should align as closely as possible with WIOA performance accountability measures. Data must demonstrate the applicant's effectiveness in providing adult education and literacy services and include evidence of academic gains (reading, writing, mathematics, or English language acquisition), employment outcomes, attainment of secondary credentials, and transitions to postsecondary education and training.

Montana uses the 13 considerations listed under “Required Local Activities” to fund each eligible provider establishing and operating programs that provide AE and literacy activities. The grant submission will include the considerations and ask for applicants to provide an explanation of how they meet the described elements. Reviewers will be given a rubric and scoring guide that includes these considerations. Funding is determined using a state-imposed performance-based formula.

WIOA mandates that the SWIB coordinate activities with education and training providers within the designated regional service areas. In accordance with WIOA Title II (34 CFR §463.21), the Montana AEFLA grant solicitation requires that the SWIB be given the opportunity to review all AEFLA applications submitted.

The SWIB will review the application materials of eligible providers to determine whether the applications are consistent with Montana’s Combined State Plan. Upon completion of this review, the SWIB will submit a formal recommendation to WIOA title II, Adult Education.

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

1. Adult Education and Literacy Services;
2. Workplace Preparation tied to Career Pathways;
3. English Language Acquisition;
4. Integrated Education and Training.

Local providers are selected using the following criteria:

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

Eligible providers will need to articulate how their instructional delivery model aligns with the needs of one-stop, postsecondary, and employer partners. This alignment at a minimum must include the ability to offer flexible scheduling so that adult education services coordinate with the students’ wrap-around support services and logistic needs. The delivery model must be of sufficient intensity and duration so that the students’ will exit with the necessary skills to attain their career goals. 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 its commitment to an instructional delivery model that can support high school equivalency attainment, as well as preparation for entrance into

postsecondary, a training program, or employment for adults with, or without, a high school diploma. This support must lead to preparation for a career pathway for all students, including the low-skilled and under-employed, in need of increasing their knowledge and skills for the next career step. All eligible providers will assess the need for providing an English Language Acquisition and Civics Education Program in their area and provide services when there is a demonstrated need.

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

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

Instructional programming will be designed to promote seamless transitions for participants into employment, post-secondary education, or training aligned with an identified career pathway. Supporting the third pillar, Integrated Systems, contextualized instruction will be guided by labor market information and strengthened through collaborative partnerships with workforce agencies, employers, and education providers to ensure participants can access opportunities without navigating fragmented systems. As Title II is now under MTDLI, programs will enhance the opportunity for co-enrollment with core WIOA partners. Additional coordinated service delivery, shared referral and eligibility processes, and integrated navigation supports that simplify participant engagement with training and employment resources. Support from local community partnerships will contribute to a more user-centered workforce system that reduces barriers to access and strengthens connections between job seekers and employers. Partnerships such as:

1. Education Partners;
2. One-Stop Partners;
3. Community-Based Organizations;
4. Employers.

Program activities that support individual career pathways will be guided by each participant's documented career portfolio. Eligible providers will describe the process for assisting students in developing and maintaining a career pathway portfolio through structured instruction utilizing a state approved career exploration tool. Providers will outline how instructional staff support participants in identifying strengths, skills, and interests; aligning these attributes with viable career options; and establishing short- and long-term goals that support entry into a defined career

pathway. Programs will describe protocols for integrating career pathway objectives into academic instruction through relevant, contextualized learning activities designed to build the 21st-century knowledge and digital literacy skills necessary for successful transition to postsecondary education, training, and employment. Career exploration efforts will focus on the six high-demand sectors as well as the four pathways to employment as outlined in the 406 JOBS Initiative, namely, health careers, construction trades, advanced manufacturing and computing, education and childcare, hospitality and recreation as well as financial and professional services.

Providers will ensure that instructional staff implement a range of evidence-based instructional strategies that promote engagement, persistence, and retention among adult learners. Instructional delivery may include whole-group instruction, individualized learning, peer tutoring, distance education, hybrid models, and co-teaching approaches. These strategies will intentionally integrate academic skill development, career counseling, and workforce readiness skills to strengthen participants' ability to obtain employment, transition to postsecondary education, or enter training opportunities, including registered apprenticeships and other work-based learning models aligned with WIOA requirements.

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

3. Organization: Providers must document evidence that they have the capacity to support the high-quality data information system (LACES) necessary to report participant outcomes and monitor program performance. The system will collect all data elements required for the WIOA Annual Statewide Performance Report. Primary indicators of performance that will be reported include:

1. Participants in unsubsidized employment during the second quarter after exit;
2. Participants in unsubsidized employment during the fourth quarter after exit;
3. Median earnings from unsubsidized employment the second quarter after exit;
4. Percentage of students who obtain a postsecondary credential or a high school equivalency diploma;
5. Percentage of students who participate in an education or training program; and
6. Percent achieving a measurable skill gain.

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

Consistent with Pillar V: Innovation and System Flexibility, eligible providers will demonstrate the capacity to operate within an adaptable public workforce system that promotes continuous

iteration, cross-sector collaboration, and responsive program design. Beyond supporting participant attainment of measurable skill gains, secondary credentials, postsecondary credentials, or entry into career pathways, providers must establish and maintain cross-agency partnerships that strengthen coordination among educators, workforce partners, and training providers. These partnerships will support feedback loops between programs and workforce partners to ensure participants receive coordinated, wrap-around services that reduce systemic barriers to success, including assistance with applications, resume development, campus engagement, and navigation of education and workforce systems.

In alignment with Pillar V's emphasis on flexibility and innovation, providers will use ongoing labor market analysis to ensure instructional programming evolves in step with regional economic conditions and emerging workforce demands, including those influenced by technological change and artificial intelligence. Utilizing current labor market information from the MTDLI at <https://lmi.mt.gov/>, providers will maintain awareness of regional industry trends and integrate this information into curriculum planning, career counseling, and Integrated Education and Training (IET) activities. Providers must be able to articulate the methodology used to incorporate employer input and labor market data into program design, demonstrating that instructional practices remain relevant, responsive, and aligned with regional career opportunities and innovation-driven workforce priorities.

In alignment with Pillar IV: Accountability, the State will ensure that continued funding for eligible providers is contingent upon demonstrated program effectiveness, data quality, and compliance with federal and state performance expectations. Providers will be required to implement rigorous data collection, validation, and reporting practices that support accurate measurement of participant outcomes and program impact. Ongoing monitoring will include review of performance data, supporting documentation, and continuous improvement plans that reflect responsiveness to local workforce needs, statewide priorities, and federal reporting requirements. Performance outcomes, including all types of federal measurable skill gains will be evaluated to determine progress toward established targets and inform performance-based funding decisions in subsequent program years.

Consistent with a state-driven accountability framework, funding allocations will be distributed through a formula that incorporates key indicators of program quality and effectiveness as reflected in the WIOA Statewide Performance Report. The State will prioritize investment in programs that demonstrate success in advancing career pathways, supporting participant transition into in-demand industries, and contributing to postsecondary attainment and labor force participation goals. Allocation methodologies will consider program performance trends, service to priority populations, alignment with regional labor market demands, and the effective use of data to inform instruction and program design.

To strengthen transparency and return on investment, the State will promote enhanced data linkages with workforce system partners and will continue to expand the use of integrated data systems that support evaluation of employment outcomes and wage progression. Providers will be expected to use data-informed decision-making to refine instructional strategies, eliminate ineffective activities, and scale practices that produce measurable gains for participants. Through

these accountability measures, the State will ensure that adult education investments support high-quality programming and contribute to closing statewide talent gaps.

Grant award preference is given to providers that demonstrate that instructional services are delivered cost-effectively to a reasonable number of students and that they can make themselves readily available to core partners for wrap-around services. Consortium applications are encouraged to assist providers in meeting the cost-benefit expectations and core partner collaboration. The state will award grants in compliance with 34 CFR Part 463, Subpart C.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate programs that provide any of the following correctional educational programs identified in section 225 of WIOA:

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

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

WIOA title II Adult Education will use no more than 20% of funds awarded to eligible providers to support programs under section 225 for incarcerated and institutionalized individuals. Corrections 225 funds are targeted at adult education and literacy activities and career pathways. Grant funds are awarded to any eligible provider that offers services to incarcerated or institutionalized individuals, and priority will be given to those serving individuals who are likely to leave the correctional institution within five years.

Funds are awarded using the same competitive application process outlined in the Common Elements-Multi-Year Grants or Contracts section. The state will award multi-year grants on a competitive basis. After the initial year of the multi-year grant award, the state will require each grantee to submit a non-competitive extension component prior to grant renewal and the awarding

of allocations at the beginning of a new program year. Grantees are evaluated for performance and continuous improvement, including technical assistance. Failure to meet criteria may result in loss of funding. The extension component will include aspects such as data reflection, goal setting, and narrative responses to promote continuous program improvement. Grant renewals will be made on a program-by-program basis and will be contingent on the program's ability to:

1. Successfully implement the terms of the grant;
2. Meet both federal and state performance expectations; and
3. Provide demonstrated value to the regional areas the program serves.

The most recent WIOA Title II RFP competition was conducted spring 2022. The next WIOA Title II RFP competition is scheduled for spring 2026.

The state will award allocations to correctional institutions including:

1. Prisons;
2. Jails;
3. Reformatories;
4. Work farms;
5. Detention centers;
6. Halfway houses;
7. Community-based rehabilitation centers; or
8. Any other similar institution designed for the confinement or rehabilitation of criminal offenders.

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

WIOA [§463.24] mandates that an applicant must demonstrate past effectiveness in providing adult education and literacy activities before that applicant can be considered an eligible applicant. All grant applications will be pre-screened prior to review to determine if the applicant agency meets the standard of demonstrated effectiveness to be considered eligible for an award." As part of the application documents submitted, all interested applicants must submit data covering a two-year period, which includes:

1. The total number of individuals served; and

2. Demonstrates the applicant's effectiveness in providing adult education and literacy activities. Areas of demonstrated effectiveness should align as closely as possible with WIOA performance accountability measures. Data must demonstrate the applicant's effectiveness in providing adult education and literacy services and include evidence of academic gains (reading, writing, mathematics, or English language acquisition), employment outcomes, attainment of secondary credentials, and transitions to postsecondary education and training.

WIOA mandates that Montana's SWIB coordinate activities with education and training providers within the designated regional service areas. In accordance with WIOA Title II (34 CFR §463.21), the Montana AEFLA grant solicitation requires that the SWIB be given the opportunity to review all AEFLA applications submitted to the state.

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

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate Integrated English Literacy and Civics Education (IELCE) programs under section 243 of WIOA. Describe how adult English language learners, including professionals with degrees and credentials in their native countries, are served in IELCE programs.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be offered in combination with integrated education and training activities found in 34 CFR section 463.36.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.

The state's application for 243 funds requires applicants to describe how they will provide English language acquisition and civics education in combination with integrated education and training

activities. Eligible providers funded with 243 funds must design programs, in combination with integrated education and training activities, to prepare English language learners for placement in unsubsidized employment leading to economic self-sufficiency and integration with local workforce development to carry out the activities of the program. Applicants will need to address the following:

1. Plans to serve eligible individuals who are English language learners to achieve competence in reading, writing, speaking, and comprehension of the English language.
2. Intentions to provide emphasis on citizenship and civics participation for English language learners.
3. Plans to increase the number of English language learners who engage in post-secondary education and training activities leading to credentials, certificates, or employment.
4. Plans to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.
5. Intentions to include workforce preparation and integrated education and training opportunities for English language learners.

The Integrated English Literacy and Civics Education (IELCE) program funded under section 243(a) of WIOA will be implemented as a required partner within the local workforce development system to ensure alignment with regional workforce strategies and activities. Eligible providers will coordinate with state and local workforce development boards and partners, American Job Centers, one-stop partners, and employers to deliver English language acquisition, civics education, workforce preparation, and offer Integrated Education and Training (IET) services, targeted to the local English Language learner population, that reflect local labor market needs and career pathway opportunities.

IELCE services will be designed to align with industry driven needs and state/local in-demand occupations by supporting language acquisition and skill building that may include workforce preparation activities and occupational skills training that lead to measurable employment outcomes. In addition to alignment with locally identified in-demand industries and occupations the program will also pursue educational support opportunities that lead to Integrated Education and Training (IET) opportunities for the statewide in-demand sectors identified in the 406 JOBS Initiative: health careers, construction trades, advanced manufacturing and computing, education and childcare, hospitality and recreation as well as financial and professional services. Furthermore, assistance with and understanding of and exploration of the multiple pathways to employment will be included in the IET or with combined collaborations with WIOA partners.

Through ongoing coordination with workforce system partners, providers will ensure program activities support the goals of the local workforce partners and contribute to systemwide performance accountability. This includes participation in regional planning efforts, use of labor

market information to inform program design, and collaboration with partners that offer job placement and career navigation services.

These services focus on providing English language adult learners, including professionals with degrees and credentials in their native country, to achieve competency in the English language and acquire the skills needed to function as citizens in the United States. Such services include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation and include opportunities for workforce training.

The IELCE funds for sections 231 and/or 243 are awarded to eligible providers through a competitive application process outlined in the Common Elements-Multi-Year Grants or Contracts. Funds are awarded using the same competitive application process outlined in the Common Elements-Multi-Year Grants or Contracts section. The state will award multi-year grants on a competitive basis. After the initial year of the multi-year grant award, the state will require each grantee to submit a non-competitive extension component prior to grant renewal and the awarding of allocations at the beginning of a new program year. Grantees are evaluated for performance and continuous improvement, including technical assistance. Failure to meet criteria may result in loss of funding. The extension component will include aspects such as data reflection, goal setting, and narrative responses to promote continuous program improvement. Grant renewals will be made on a program-by-program basis and will be contingent on the program's ability to:

1. Successfully implement the terms of the grant;
2. Meet both federal and state performance expectations; and
3. Provide demonstrated value to the regional areas the program serves.

The most recent WIOA Title II RFP competition was conducted spring 2022. The next WIOA Title II RFP competition is scheduled for spring 2026.

WIOA [§463.24] mandates that an applicant must demonstrate past effectiveness in providing adult education and literacy activities before that applicant can be considered an eligible applicant. All grant applications will be pre-screened prior to review to determine if the applicant agency meets the standard of demonstrated effectiveness to be considered eligible for an award." As part of the application documents submitted, all interested applicants must submit data covering a two-year period, which includes:

1. The total number of individuals served; and
2. Demonstrates the applicant's effectiveness in providing adult education and literacy activities. Areas of demonstrated effectiveness should align as closely as possible with WIOA performance accountability measures. Data must demonstrate the applicant's effectiveness in providing adult education and literacy services and include evidence of academic gains (reading, writing, mathematics, or English language acquisition), employment outcomes, attainment of secondary credentials, and transitions to postsecondary education and training.

WIOA mandates that the SWIB coordinate activities with education and training providers within the designated regional service areas. In accordance with WIOA Title II (34 CFR §463.21), the Montana AEFLA grant solicitation requires that the SWIB be given the opportunity to review all AEFLA applications submitted to the state.

E. STATE LEADERSHIP

1. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT THE REQUIRED STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA

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

First, the state will collaborate with core partners to provide regional and statewide conferences and trainings. The State AE Unit has already supported statewide workshops that have brought hundreds of staff members from all the core partner agencies together to foster discussion on how to best coordinate services to support a client's development of a career pathway and expedite his/her transition to employment or training services. MTDLI WIOA Title II staff members continue to be involved in WIOA planning on both state and local levels. Collaboration across core partner agencies will evolve to meet the needs of WIOA implementation and sustainability.

Second, the state will support eligible providers' ability to integrate and sustain career pathways in their instructional practice. Funds will be available to support regional meetings with workforce and one-stop partners to help AE programs identify the components of job-driven training that need to be incorporated into their curriculum. Regional professional development will make use of leadership dollars to assist programs in learning how to become responsive to local labor market demands.

Third, the state will use funds to develop templates and identify resources that support a systemic approach to career pathways; technical assistance will be made available for providers on the use of state developed resources that will inform their pathway implementation. State leadership funds will establish high quality professional development to improve instruction in the essential components of reading instruction and research-based approaches related to the specific needs of adult learners. Leadership activities with essential components of reading focus will be used to create the foundation for adults to develop the skills needed to obtain high school equivalency, transition to postsecondary education, or enter the workforce. The state will contract with field and subject experts as needed and as budgets allow. Teachers are required to participate in a variety of professional development that blends face-to-face and virtual delivery.

The state will also contract for services such as a robust, vendor-supplied data management system to accurately capture WIOA Title II participant and performance data as well as with individuals to bring research-based activities that support adult learners in other content areas and workforce learning activities. Program data will inform the state of promising instructional practices and effective instructional strategies. The state will use this information to disseminate information

about models and promising practices related to the needs of adult learners. In programs where students readily make gains in reading, the state will support staff in the development of teacher lessons, resource links, and fund preparation for trainings to assist colleagues in successful reading instruction. The state will carefully monitor student data to see patterns on student transition to postsecondary, employment, and credential attainment. Programs that have data reflecting successful student exit trends may be provided funds to prepare workshops and regional trainings to share instructional strategies and activities that positively impact student outcomes.

The state recognizes the importance of students' acquiring 21st century work-place skills, so the state will provide technical assistance to eligible providers on an as needed basis. Technical assistance is available for instructional improvement in reading, writing, mathematics, English language acquisition, speaking, as well as distance learning. Technical assistance is offered in two ways: training with staff from other eligible providers who have demonstrated effectiveness or independent contractors. In either case, the individual contractor is selected based on their ability to provide rigorous, research-based content that will promote program improvement.

Working with one-stop partners to provide students with access to education and training services is a priority. Technical assistance is available for programs in the use of technology, including digital technology and technology for system efficiencies.

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

The state will also conduct periodically scheduled onsite monitoring to gather additional information about the eligible providers' successes in equipping students with skills needed for seamlessly transitioning from AE to employment, postsecondary, or training. A monitoring evaluation tool will be used to guide 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 required monthly desk audits and periodic onsite visits described above will be the primary methods to monitor and evaluate the quality of adult education and literacy activities. Additionally, the state has always engaged in ongoing data monitoring which provides the opportunity for immediate technical assistance to promote local program success. In the event that the desk audit, onsite evaluation, or ongoing data conversations are not sufficient support for continued 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 local providers in their program improvement plan. All AE staff will be required to participate in a minimum number of hours of professional development annually that is provided by the WIOA title II AE Unit. In addition, AE Staff will be required to participate in professional development aligned with AE objectives beyond the state-sponsored meetings.

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 provide assistance to 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

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II. Describe how the eligible agency will take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Describe how the eligible agency will use evaluations, data analysis, program monitoring, or other methods to improve the quality of adult education activities in the State.

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

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

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

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

Programs must demonstrate plans for continuous improvement - academic gains and performance outcomes should be met or exceeded each year.

Allocations to eligible providers are awarded based on a combination of needs and performance-based metrics.

The quality of professional development is assessed with scrutiny similar to assessing the quality of local providers. The state uses a combination of program data and a statewide survey to determine professional development needs. Professional development providers and activities are selected to meet the identified state needs. Special attention is given when determining who and how we will select a professional development strategy based on research-based methods. This is a priority for the state. For example: data analysis review, WIOA updates, or mental health awareness may be identified needs. Providing professional development based on data and the needs/areas of interest of providers will ultimately improve the quality of services and overall student outcomes. At the conclusion of each professional development activity, all participants complete an evaluation, which is aggregated at the state level to assess the impact of the activity and what follow-up activities are needed to support program improvement. Additionally, participants are required to analyze student performance data prior to professional development, at the conclusion of the activity, and continue to evaluate the data overtime, until it is determined the professional development has become job-embedded and is making the anticipated positive impact on student outcomes. The programs self-analysis and student data will also be a source for the state to glean and disseminate information about models and promising practices. The state will use leadership funds to cover partial cost of a robust data management system (LACES), provide professional development opportunities, and disseminate information about programs who have effectively implemented innovative practices based on professional development activities.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS

States must provide written and signed certifications that:

The State Plan must include	Include
1. The plan is submitted by the State agency that is eligible to submit the plan;	Yes
2. The State agency has authority under State law to perform the functions of the State under the program;	Yes

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

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;	Yes
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not “eligible individuals” within the meaning of	Yes

The State Plan must include	Include
section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;	
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes

AUTHORIZING OR CERTIFYING REPRESENTATIVE

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

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

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

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, contracts under grants,

loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

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

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

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

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

	Montana Department of Labor and Industry
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	Enter information in this column
First Name	Jacque
Last Name	Wroble
Title	Title II Program Manager
Email	Jacqueline.Wroble@mt.gov

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.
 2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?
 3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?
 4. What is your timeline, including targeted milestones, for addressing these identified barriers?
- Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.
 - Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.
 - Applicants are not required to have mission statements or policies that align with equity to apply.
 - Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.
 - Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

GEPA Section 427 Instructions to State Applicants for their Subrecipient Applicants

The State grantee provides a subrecipient applicant seeking Federal assistance instructions and guidance for how it must comply with the GEPA Section 427 requirement. The State grantee determines the form and content of the information a subrecipient applicant must include in its application regarding the steps it proposes to take to ensure equitable access to, and equitable participation in, its local-level project or activity. For example:

- The State grantee may require its subrecipient applicant to use and submit the GEPA Section 427 form that it is required to submit to the Department; or
- The State grantee may use a State-developed form that is sufficient to meet the GEPA Section 427 requirement.
- The State grantee maintains the subrecipient applicants' responses in the State office.

Please refer to GEPA 427 - Form Instructions for AEFLA Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

Montana submits a combined response for questions 1-4.

In accordance with Section 427 of the Department of Education's General Provision Act (GEPA), the MTDLI ensures equal access and participation in the SRCL project to all persons regardless of their gender, race, national origin, color, disability, or age. The MTDLI identifies and implements strategies to ensure that all of its population has equitable access to, and participation in, its federally assisted programs for students, teachers, and other program beneficiaries with special needs. The largest minority population in Montana is the Native American population. Efforts to ensure coordination and collaboration with agencies from Native American communities are

reflected in all MTDLI activities. These proactive steps will ensure that project services are available to eligible students, families, and providers in communities throughout the state.

Documents are translated, using translators and interpreters; and other formats (e.g., large print, Braille, text-to-speech software) at the state or local level, as needed.

Meet individual needs that result from a disability to enable the individual to be involved in and make progress in the general education curriculum at the local level, as needed.

Standard testing accommodation will be made for identified students with disabilities at the local level, according to test vendor guidance, as needed.

Local providers will ensure programs are using and have access to curriculum resources that are accessible and nonbiased to students, teachers, and other program beneficiaries with special needs.

Community and family involvement will reflect equitable access to all populations of the state of Montana and will not be limited by gender, race, national origin, color, disability, or age at the state or local level.

All professional development will be located in accessible facilities and necessary adaptive accommodations will be made to make the content of the workshop accessible to all participants (e.g., large print, Braille, speech-to-text software, adaptive technology) at the state or local level.

The MTDLI will ensure local WIOA Adult Education Programs are adhering to the proactive steps listed above via program visits, monitoring, and grant competition applications. Applicants requesting AEFLA/WIOA Title II funding are required to acknowledge their compliance with the General Education Provisions Act (GEPA). Failure to address the GEPA consideration and to submit a program-specific GEPA plan will result in the non-consideration of the submitted competitive award application. For state-level adult education activities, State Leadership Funds, as well as all other activities supported by federal assistance, the State will fully enforce all federal and state laws and regulations designed to ensure equitable access to all program beneficiaries and to overcome barriers to equitable participation.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

Montana submitted a combined response.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

Montana submitted a combined response.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

Montana submitted a combined response.

ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

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

Included below are the state’s expected levels of performance relating to the performance accountability indicator’s based on primary indicators of performance described in section 116(b)(2)(A) of the Workforce Innovation and Opportunity Act (WIOA).

Note: Performance targets for PY 2026 and 2027 will not be available before the conclusion of scheduled federal negotiations (TBD), which are anticipated to begin in April 2026. Per TEGL 11-19, Change 2, “With respect to the Effectiveness in Serving Employers (ESE) indicator, since it is a statewide measure that reflects a combined result across WIOA titles I, II, III, and IV programs, the Departments will jointly engage in negotiations with state representatives from all core programs.”

MTDLI has worked extensively on performance accountability pertaining to all Core programs. The work aligns with Pillar IV: Accountability: Ensuring federally funded workforce program deliver measurable results by linking investments to outcomes and enforcing performance discipline of the America’s Talent Strategy: Building the Workforce for the Golden Age.

The indicators of performance measure and evaluate the effectiveness of individual programs and the State’s workforce development system. These indicators are well aligned with the goals described throughout the State Plan and the 406 JOBS framework to allow our programs to measure how well they are serving participants and employers. Progress toward these indicators is evaluated against the performance targets negotiated by each program with their applicable federal agencies.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	53.0%	TBD	54.0%	TBD
Employment (Fourth Quarter After Exit)	57.0%	TBD	58.0%	TBD

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Median Earnings (Second Quarter After Exit)	\$4,500	TBD	\$4,600	TBD
Credential Attainment Rate	60.0%	TBD	61.0%	TBD
Measurable Skill Gains	55.5%	TBD	56.0%	TBD

**PROGRAM-SPECIFIC REQUIREMENTS FOR STATE VOCATIONAL REHABILITATION
(COMBINED OR GENERAL)**

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

A. STATE REHABILITATION COUNCIL.

1. ALL VR AGENCIES, EXCEPT FOR THOSE THAT HAVE AN INDEPENDENT CONSUMER-CONTROLLED COMMISSION, MUST HAVE A STATE REHABILITATION COUNCIL (COUNCIL OR SRC) THAT MEETS THE CRITERIA IN SECTION 105 OF THE REHABILITATION ACT. THE DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPLICABLE, HAS:

Select A or B:

(B) has established a State Rehabilitation Council

(B) has established a State Rehabilitation Council

2. IN ACCORDANCE WITH ASSURANCE (A)(1)(B), IF SELECTED, PLEASE PROVIDE INFORMATION ON THE CURRENT COMPOSITION OF THE COUNCIL BY REPRESENTATIVE TYPE, INCLUDING THE TERM NUMBER OF THE REPRESENTATIVE, AS APPLICABLE, AND ANY VACANCIES, AS WELL AS THE BEGINNING DATES OF EACH REPRESENTATIVE'S TERM.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	1st Term (JH)	04-01-2024

Parent Training and Information Center	1st Term (HG)	12-01-2024
Client Assistance Program	1st Term (EB)	12-19-2024
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	2nd Term (CC)	11-15-2024
Community Rehabilitation Program Service Provider	2nd Term (DM)	10-09-2025
Business, Industry, and Labor	1st Term (WD)	2-24-2025
Business, Industry, and Labor	1st Term (AK)	10-9-2025
Business, Industry, and Labor	2nd Term (CM)	10-09-2025
Business, Industry, and Labor	1st Term (SS)	10-09-2025
Disability Advocacy Groups	2nd Term (LK)	11-15-2024
Disability Advocacy Groups	1st Term (MM)	4-01-2024
Disability Advocacy Groups	1st Term (JM)	10-09-2025
Disability Advocacy Groups	1st Term (LZ)	10-9-2025
Disability Advocacy Groups	1st Term (AS)	2-13-2025
Section 121 Project Directors in the State (as applicable)	2nd Term (JW)	10-09-2025
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	1st Term (DJ)	11-15-2024
State Workforce Development Board	1st Term (TH)	10-9-2025
VR Agency Director (Ex Officio)	1st Term (CH)	04-01-2024

Current or Former Applicants for, or Recipients of, VR services	2nd Term (BT)	11-15-2024
Current or Former Applicants for, or Recipients of, VR services	1 st Term (RB)	10-9-2025
Current or Former Applicants for, or Recipients of, VR services	1st Term (GB)	1-1-2023
Current or Former Applicants for, or Recipients of, VR services	1st Term (SB)	8-14-2023
Current or Former Applicants for, or Recipients of, VR services	1 st Term (MN)	12-15-2025
Current or Former Applicants for, or Recipients of, VR services	1 st Term (TB)	12-15-2025

3. IF THE SRC IS NOT MEETING THE COMPOSITION REQUIREMENTS IN SECTION 105(B) OF THE REHABILITATION ACT AND/OR IS NOT MEETING QUARTERLY AS REQUIRED IN SECTION 105(F) OF THE REHABILITATION ACT, PROVIDE THE STEPS THAT THE VR AGENCY IS TAKING TO ENSURE IT MEETS THOSE REQUIREMENTS.

There are currently no vacancies on Montana’s State Rehabilitation Council.

Additionally, the SRC continues to meet quarterly.

In 2025, meeting dates for the SRC were:

- February 13 & 14, 2025 – in Helena, MT
- May 12 & 13, 2025 - in Missoula, MT
- August 7 & 8, 2025 – in Havre, MT
- October 23 & 24, 2025 – in Hamilton, MT

In 2026, meeting dates for the SRC will be:

- January 29 & 30, 2026 – in Helena, MT
- April 29 & 30 & May 1, 2026 – in Helena, MT
- Summer dates and location to be determined
- Fall dates and location to be determined

4. IN ACCORDANCE WITH THE REQUIREMENTS IN SECTION 101(A)(21)(A)(II)(III) OF THE REHABILITATION ACT, INCLUDE A SUMMARY OF THE COUNCIL'S INPUT (INCLUDING HOW IT WAS OBTAINED) INTO THE STATE PLAN AND ANY STATE PLAN REVISIONS, INCLUDING RECOMMENDATIONS FROM THE COUNCIL'S ANNUAL REPORTS, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION AND OTHER COUNCIL REPORTS.

SRC input on the services and operations of the VR program and the State Plan is regularly collected during quarterly meetings. Consumer satisfaction survey results, strategic plan updates, and state plan progress are standing agenda items for SRC and are usually addressed at the first, second, and third quarterly meetings of the year respectively. Typically, the topics are presented on by VR staff by reminding the SRC of the purpose and process associated with each activity and then current data and progress updates shared. Throughout the presentations, SRC members are welcome to ask questions and/or provide comments and feedback. After the VR staff presentation, further time for questions, discussion, and feedback is offered. The SRC is welcome to make formal motions related to topics and tasks they would like VR to pursue further.

During the summer 2023 meeting of the SRC following a sub-committee report to the full council on Consumer Satisfaction Survey, a motion was made by an SRC member to pursue utilizing appropriate Montana procurement practices to secure a contractor to manage this process and function in hopes of receiving statistically significant response rates. This motion was unanimously passed and VR leadership in partnership with the Consumer Satisfaction Survey sub-committee immediately began procurement. Initially, a "mini-RFP" was pursued where a scope of work for the Consumer Satisfaction Survey was proposed to current State of Montana contractors to accept as a task order added to their current contract. This did not result in a contract. Next, a full RFP was developed that resulted in a contract with Market Decisions, LLC out of Portland, Maine that was executed in April 2025. Since April 2025, Market Decisions, LLC has met at least monthly to develop, test, implement, and disseminate a survey to MT VR clients in various stages of the VR process, from application to case exit. As of January 2026, over 950 responses have been collected to the survey since its implementation in September 2025. Survey data is shared with the Consumer Satisfaction Survey sub-committee quarterly and the sub-committee chair reports that information out to the full SRC at each SRC meeting. Additionally, Market Decisions, LLC, as part of the contractual deliverables, will provide a comprehensive overview of the survey results to the SRC during the May 2026 quarterly meeting. Now that VR is receiving useable consumer satisfaction data as a result of the aforementioned project, this data will also be used by the SRC to inform formal recommendations to the VR Program this year and following years.

In calendar year 2025, VR staff presented on Goal 1 in February, Goals 2 and 3 in May, and Goal 4 in October. Time was provided for SRC members to ask questions and make edits or additions to the strategies and associated tasks to accomplish the goals. Some discussion was had during these presentations, however no formal amendments or additions were made to the goals, objectives, strategies or tasks. Rather, the SRC made formal recommendations as reported in the 2025 Governor's Report that directly impact VR's work towards the goals. The formal recommendations for 2025 were composed during the October 2025 meeting. The SRC reviewed the 2024 recommendations and chose to keep, adjust, and add to the 2024 recommendations for inclusion in the 2025 Governor's Report.

In the 2025 SRC Annual Report, the following recommendations were given by the SRC to the VR program:

1. Establish clearer criteria and counseling practices to ensure VR participants pursuing post-secondary education demonstrate commitment and readiness for academic success.
2. Continue collaboration with the Harkin Institute and advocate for Employment First policies that promote Competitive Integrated Employment for individuals with significant disabilities.
3. Increase awareness and utilization of On-the-Job-Training as a powerful tool for skill-building and employment placement.
4. Develop a Memorandum of Understanding between VR and Montana's American Indian Vocational Rehabilitation Services (AIVRS) that establishes referral procedures, service coordination, data sharing, and joint planning to ensure seamless collaboration, eliminate duplication, and maximize resources for shared customers.
5. Ensure effective communication access is provided for all consumers, including Deaf and Hard of Hearing individuals, through qualified interpreters and accessible communication methods as defined by the ADA.
6. Promote equity in service delivery by addressing disability-specific access needs (e.g., communication, mobility, sensory, and behavioral health supports) to ensure all Montanans can participate fully.
7. Prioritize individualized, student-centered services to ensure Pre-ETS funding is used in ways that directly benefit students.
8. Provide robust career counseling and postsecondary planning to youth, ensuring informed decisions that support successful transitions into adulthood.
9. Enhance Pre-ETS to more effectively support students with disabilities in college environments, ensuring continuity of services and successful outcomes.
10. Develop a Memorandum of Understanding between VR and Montana's American Indian Vocational Rehabilitation Services (AIVRS) regarding Pre-ETS that establishes referral procedures, service coordination, data sharing, and joint planning to ensure seamless collaboration, eliminate duplication, and maximize resources for shared customers.
11. Invest in tools and training that help VR job seekers build essential soft skills and equip counselors with resources to deliver these effectively.
12. Update VR strategies to reflect the evolving labor market, emphasizing real-world competencies beyond academic credentials.
13. Continue rebranding initiatives to improve public perception, outreach, and stakeholder engagement.
14. Incorporate feedback from Consumer Satisfaction Survey to improve services.
15. Implement a staff engagement survey to assess employee engagement and incorporate feedback into future planning.

In calendar year 2026, VR staff presented on the State Plan 2026 modifications to the VR Portion during the January 2026 meeting to allow the SRC individualized time to review the modifications and provide feedback. In addition to the January 2026 SRC meeting, the VR Program hosted a

virtual Town Hall on February 12, 2026 that the SRC along with other stakeholders were invited to attend. Commentary and feedback on the State Plan 2026 modifications to the VR Portion was collected and the proposed 2026 modifications were reviewed and edited as needed to include the feedback given.

The Montana State Rehabilitation Council met on January 29–30, 2026, during which VRBS management presented a fiscal forecast indicating that, due to resource constraints, the agency may need to consider closing Category One under the current Order of Selection (OOS).

After the presentation, the Council held a formal vote. A quorum of members affirmed the decision to move forward with Category One closure under Montana’s current Order of Selection in coordination with the RSA. This action is intended to ensure the long-term sustainability of VRBS programs.

5. PROVIDE THE VR AGENCY’S RESPONSE TO THE COUNCIL’S INPUT AND RECOMMENDATIONS, INCLUDING AN EXPLANATION FOR THE REJECTION OF ANY INPUT AND RECOMMENDATIONS.

List each recommendation/input followed by the VR agency response

1. Establish clearer criteria and counseling practices to ensure VR participants pursuing post-secondary education demonstrate commitment and readiness for academic success.
 - a. VR Response: VR recognizes the importance of ensuring participants pursuing post-secondary education demonstrate commitment and readiness for academic success. To address this, VR has established a College/Training Workgroup composed of staff from various roles within the agency. This workgroup is actively developing procedures and tools designed to strengthen career counseling practices and support informed decision-making as participants consider training options.
2. As part of these efforts, VR is implementing a requirement for academic assessments prior to enrollment in post-secondary training. These assessments provide both the counselor and the participant with a clear understanding of the participant’s academic starting point. For example, the assessment will help determine whether the individual is prepared to begin university-level coursework or if they would benefit from preparatory or brush-up training through Adult Education before advancing to higher-level courses.
3. These steps will ensure that participants receive the necessary guidance and resources to succeed academically and achieve their career goals.
4. Continue collaboration with the Harkin Institute and advocate for Employment First policies that promote Competitive Integrated Employment for individuals with significant disabilities.
 - a. VR Response: Under the 406 JOBS Executive Order, the agency is actively working toward finalizing an Employment First Strategic Plan by June 2026. The Harkin Institute is facilitating these efforts and providing guidance throughout the process. VR, along with all partner agencies involved, is committed not only to developing the strategic plan but also to implementing the necessary action steps identified within the plan. These actions will position Montana to formally become an

Employment First state, promoting Competitive Integrated Employment for individuals with the most significant disabilities.

5. Increase awareness and utilization of On-the-Job-Training as a powerful tool for skill-building and employment placement.
 - a. VR Response: In late 2025, VR's executive leadership team toured the state as part of a series of Disability Employment Meets Industry events, with a strong focus on promoting On-the-Job Training (OJT) as a tool for skill-building and employment placement. As part of this initiative, VR updated its OJT procedure and OJT contract to streamline implementation. Staff received comprehensive training on the service, including utilization strategies and hands-on practice with employer negotiations.
6. OJT continues to be a priority for our business services team, who actively support career counseling staff as they incorporate this option into employment plans. Staff enthusiasm for OJT is evident, with several team members including increased OJT utilization in their professional goals for 2026. These efforts reflect VR's commitment to expanding opportunities for individuals with disabilities through practical, work-based learning experiences.
7. Develop a Memorandum of Understanding between VR and Montana's American Indian Vocational Rehabilitation Services (AIVRS) that establishes referral procedures, service coordination, data sharing, and joint planning to ensure seamless collaboration, eliminate duplication, and maximize resources for shared customers.
 - a. VR Response: VR is enthusiastic about the opportunity to strengthen collaboration with Montana's American Indian Vocational Rehabilitation Services (AIVRS). We acknowledge that, since the pandemic, our agency has not made significant progress in this area, and we recognize the importance of revitalizing this partnership. Establishing Memoranda of Understanding with each tribal program that outline referral procedures, service coordination, data sharing, and joint planning is critical to ensuring seamless collaboration, limiting duplication, and maximizing resources for shared customers.
8. This partnership is essential not only for job seekers but for the entire workforce system. VR is committed to re-engaging with the tribes and taking concrete steps to build a strong, coordinated approach that supports individuals with disabilities in tribal communities and enhances employment outcomes statewide.
9. Ensure effective communication access is provided for all consumers, including Deaf and Hard of Hearing individuals, through qualified interpreters and accessible communication methods as defined by the ADA.
 - a. VR Response: VR fully agrees with the importance of ensuring effective communication access for all participants, including individuals who are Deaf or Hard of Hearing. The agency is committed to providing qualified interpreters and to utilizing accessible communication methods as defined by the ADA. We recognize that clear and equitable communication is essential for delivering quality services and supporting successful outcomes. VR will continue to prioritize these practices and explore opportunities to strengthen accessibility across all service delivery settings.

10. Promote equity in service delivery by addressing disability-specific access needs (e.g., communication, mobility, sensory, and behavioral health supports) to ensure all Montanans can participate fully.
 - a. VR Response: VR fully supports promoting equity in service delivery by addressing disability-specific access needs, including communication, mobility, sensory, and behavioral health supports. We recognize that true inclusion means ensuring all Montanans can participate fully in the workforce system. Our goal is to be the leading workforce agency in Montana for providing accessible, person-centered services that remove barriers and create opportunities for individuals with disabilities. VR is committed to continuous improvement and collaboration to make this vision a reality.
11. Prioritize individualized, student-centered services to ensure Pre-ETS funding is used in ways that directly benefit students.
 - a. VR Response: VR agrees with the importance of prioritizing individualized, student-centered services to ensure Pre-ETS funding is used in ways that directly benefit students. The agency is committed to keeping students at the center of all Pre-ETS activities and is continually exploring innovative ways to support students with disabilities in achieving their education and employment goals. By focusing on personalized approaches, we aim to provide meaningful experiences that prepare students for successful transitions into post-secondary education, training, and competitive integrated employment.
12. Provide robust career counseling and postsecondary planning to youth, ensuring informed decisions that support successful transitions into adulthood.
 - a. VR Response: VR is committed to providing robust career counseling and postsecondary planning to youth, ensuring they are exposed to a wide range of opportunities that support self-sufficiency and family-sustaining wages in adulthood. Our approach emphasizes individualized guidance, helping students make informed decisions about education, training, and career pathways. By equipping youth with the tools and knowledge they need, we aim to foster successful transitions into adulthood and long-term economic independence.
13. Enhance Pre-ETS to more effectively support students with disabilities in college environments, ensuring continuity of services and successful outcomes.
 - a. VR Response: VR acknowledges the importance of enhancing Pre-ETS to more effectively support students with disabilities in college environments and to ensure continuity of services for successful outcomes. To address this, the agency has adjusted the roles and responsibilities of our Pre-ETS Specialists to provide targeted support to these students. This shift recognizes the unique nature of service delivery in college settings and ensures that students receive specialized assistance tailored to their needs, rather than relying solely on general VR counselors. These changes strengthen our ability to help students navigate postsecondary environments and achieve their academic and career goals.
14. Develop a Memorandum of Understanding between VR and Montana's American Indian Vocational Rehabilitation Services (AIVRS) regarding Pre-ETS that establishes referral

procedures, service coordination, data sharing, and joint planning to ensure seamless collaboration, eliminate duplication, and maximize resources for shared customers.

- a. VR Response: VR greatly appreciates this recommendation and acknowledges that the agency has never formally engaged with Montana's American Indian Vocational Rehabilitation programs in this way. We are excited to work with the American Indian VR Technical Assistance Center to support this initiative. Developing a Memoranda of Understanding focused on Pre-ETS will help establish referral procedures, service coordination, data sharing, and joint planning. This collaboration is critical to better serving Native students with disabilities and ensuring program alignment that supports both individual success and the broader frontier workforce needs. VR is committed to building this partnership and maximizing resources for shared customers.
15. Invest in tools and training that help VR job seekers build essential soft skills and equip counselors with resources to deliver these effectively.
 - a. VR Response: VR continually works to identify and implement appropriate soft skills training and tools to enhance the job seeker skill sets. We know from consistent feedback across industries that the number one driver of workplace success is strong soft skills. Employers have emphasized this repeatedly, and we are listening. VR is excited to enhance these services and better equip both our career counseling staff and job seekers to meet industry needs. By strengthening these essential skills, we aim to improve employment outcomes and long-term workplace success for individuals with disabilities.
 16. Update VR strategies to reflect the evolving labor market, emphasizing real-world competencies beyond academic credentials.
 - a. VR Response: VR recognizes the importance of updating strategies to reflect the evolving labor market that emphasize real-world competencies beyond academic credentials. To support this, our Business Services Team is actively developing methods and tools to help career counseling staff confidently navigate and share accurate labor market information specific to their community. The team has launched several initiatives, including a quarterly "VR Business Insider" for each office, a live internal job board, and direct connections between local offices and industry leaders. These efforts ensure the entire system works effectively to provide job seekers with exceptional, up-to-date information, empowering them to make informed choices that align with local workforce needs.
 17. Continue rebranding initiatives to improve public perception, outreach, and stakeholder engagement.
 - a. VR Response: VR agrees with the importance of continuing rebranding initiatives to improve public perception, outreach, and stakeholder engagement. The agency is actively adjusting branding and terminology so that the mission and intent of our services are clearer and more understandable to the general public and the workforce. We now have a social media presence where we share workforce success stories, and we are updating our websites, brochures, and all forms to align with

these efforts. These changes are designed to strengthen awareness of VR services and highlight the impact we have on individuals and communities across Montana.

18. Incorporate feedback from Consumer Satisfaction Survey to improve services.
 - a. VR Response: VR thanks the council for supporting the agency in developing and implementing an effective Consumer Satisfaction Survey. We recognize the value of this feedback and are looking forward to gathering and analyzing the information to guide and shape future programming. This input will help us identify strengths, address areas for improvement, and ensure that our services continue to meet the needs of individuals with disabilities across Montana.
19. Implement a staff engagement survey to assess employee engagement and incorporate feedback into future planning.
 - a. VR Response: VR agrees that implementing a staff engagement survey is an important step, as employee engagement is essential to providing high-quality services to individuals with disabilities, our partner agencies, and Montana's workforce. Gathering feedback from staff will help us identify strengths, address challenges, and incorporate their insights into future planning. By fostering an engaged and supported internal workforce, we can ensure the delivery of exceptional services and outcomes for the communities we serve.

B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA).

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

1. THE VR SERVICES NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, INCLUDING:
 - A. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES AND THEIR NEED FOR SUPPORTED EMPLOYMENT;

The most recent Comprehensive Statewide Needs Assessment (CSNA) was completed by Bloom Consulting as a result of a request for proposal (RFP). Bloom Consulting commenced the Montana CSNA project on August 1, 2022 and completed the project with a final written report to Montana VRBS on December 31, 2023. Summary findings and recommendations listed throughout section b. Comprehensive Statewide Needs Assessment (CSNA) have been pulled directly from Bloom Consulting's final report.

SUMMARY FINDINGS

- Customized employment is the most salient need identified for individuals with the most significant disabilities, including those needing supported employment. Montana is reshaping its approach to customized employment to support increased access and use of this service.
- Supported employment and extended employment are considered effective; however, access is mixed. VRBS and DDP stakeholders work to coordinate supported and extended

employment services for clients. Access is hindered by limited staff and job coach capacity, especially in rural areas.

The closure of Category One under Montana’s current OOS will significantly reduce the number of eligible individuals who can receive vocational rehabilitation services. This decision reflects resource limitations and the need to maintain program sustainability.

For FFY26, Montana VRBS projects that 1,727 individuals with the most significant disabilities will continue to receive services despite the closure, including approximately 180 individuals who will participate in supported employment services. While this measure prioritizes individuals with the greatest need, it will inevitably limit access for others who would otherwise qualify for services. Montana VRBS remains committed to maximizing available resources to serve those with the most significant disabilities and to ensure compliance with federal requirements.

PEOPLE WITH SIGNIFICANT DISABILITIES

VRBS staff, CRP, and partner respondents were asked to consider the adequacy and quality of training and career services for people with significant disabilities. More respondents across all respondent groups were more likely to disagree or strongly disagree than agree or strongly agree that the availability and quality of training and career services for people with significant disabilities is adequate. Partner respondents were less familiar with the availability and quality of training and career services for people with significant disabilities needing supported employment; a larger share of partner respondents responded, “don’t know,” which influenced their overall assessment of services.

CUSTOMIZED EMPLOYMENT: Some of the perceived inadequacy of training and career services is related to limited access to customized employment services for people with the most significant disabilities, including those needing supported employment. In January 2024, Montana will be shifting its approach to a model that has proven successful in comparable states. In this new approach, people with the most significant disabilities, including those needing supported employment, will start with customized employment services, without first struggling with mainstream VRBS career services.

Recommendation: Analyze outcomes associated with the new customized employment approach and adjust as needed through a continuous improvement process.

TRANSPORTATION AND JOB-RELATED CHALLENGES: Survey respondents provided additional details on challenges serving people with the most significant disabilities, including those needing supported employment, reflecting feedback about basic needs and job-related challenges shared earlier in the report. These challenges included transportation, aligning client skills and abilities with jobs, limited job opportunities in small towns and rural areas, and employer reluctance to hire people with the most significant disabilities.

COORDINATING SERVICES AND RESOURCES: People with the most significant disabilities are typically served by VRBS and DDP in addition to other potential supporting agencies, requiring

coordination of service delivery and funding sources, which complicates serving this population. Limited resources in smaller or more rural communities make this harder.

EXTENDED EMPLOYMENT: Stakeholders felt that the extended employment program is valuable. Extended employment services have the same coordination requirements as supported employment providing long-term supported employment services to individuals with the most significant disabilities who do not have access to Medicaid waivers available in Montana.

STAFF AND CONTRACTOR CAPACITY: CRP staffing shortages and VRBS staff capacity limitations impact people with the most significant disabilities, including those needing supported employment, in many ways that are similar to impacts on the broader VRBS client population, including inability to provide sufficient one-on-one job coaching support needed by this population. VRBS agency investments and CRPs will be discussed in more detail in later sections of the report.

B. INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES AND INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

SUMMARY FINDINGS

- Working age Native Americans and people who identify as two or more races experience the highest rates of disability among racial/ethnic groups in Montana. Latinos have the third highest rate of disability.
- Individuals who are Native American and those who identify as English language learners identified increased barriers to success and challenges in accessing services. Barriers include lack of jobs, transportation, housing, and service providers.
- More VRBS staff, CRP, and partner respondents considered people with behavioral health disabilities and brain injuries to be unserved or underserved compared to people with other types of disabilities. However, respondents felt every type of disability was underserved or unserved to some degree.
- More staff, CRPs, and partners considered people living in rural areas of the state and those experiencing homelessness to be unserved or underserved compared to other groups. As with disability type, respondents said every subgroup was underserved or unserved to some degree.
- Improving transportation options was the top action recommended by staff and CRP respondents to improve service provision for unserved and underserved people.

Montana VRBS will implement the closure of Category One under the state's current OOS effective June 1, 2026. This action is necessary to address resource limitations and ensure program sustainability. As a result, by the end of FFY26, an estimated 1,478 eligible individuals will remain unserved. This includes approximately 650 individuals in Category One (those with the most significant disabilities), 680 in Category Two (those with significant disabilities), and 148 in Category Three (those with disabilities that are neither significant nor most significant).

To mitigate the impact of delayed services, VRBS counselors will continue to refer individuals on the waiting list to appropriate federal and state programs, including other components of the statewide workforce development system. These referrals will assist individuals in accessing employment, training, housing, food, and clothing resources while they await VR services.

PREVALENCE BY RACE/ETHNICITY

Working age Native Americans and people who identify as two or more races experience the highest rates of disability among racial/ethnic groups in Montana. Approximately 1 in 7 working age Native Americans have a disability (14.5% of all Native Americans). This is followed by people who identify as two or more races, of which 13.3% have a disability. Latinos have the third highest rate of disability; 1 in 8 Latinos (12.6% of all Latinos) experience disability, which is higher than the national rate of 8.5%. The rate of disability among the working age white population of Montanans (10.9%) is roughly on par with the national rate 10.4% for the white working age population. At the other end of the continuum, racial groups that had lower rates of disability compared to other racial or ethnic groups in Montana include people who identify as Pacific Islander, Black, Asian and some other race. However, it should be noted that the estimates for these comparatively small populations in Montana have a high margin of error; therefore, disability prevalence rate estimates for these groups are unstable.

VARIATION IN BARRIERS AND SERVICE RECEIPT AMONG RACIAL AND CULTURAL SUBGROUPS

The share of individuals who identified barriers to success varied somewhat by subgroup within the VRBS client population. American Indians were more likely to identify barriers to basic needs than non-American Indians, and English language learners were more likely to report job-related challenges compared to non-English language learners. Similarly, access to needed services varied among individuals from racial and cultural subgroups within the VRBS and Pre-ETS client population. English language learners were more likely to identify challenges accessing needed Pre-ETS services compared to non-English language learners, and American Indian respondents were more likely to identify gaps in accessing needed supportive services and Pre-ETS services compared to respondents who did not identify as American Indian.

As noted in the un/underserved section below, interviewees and focus group participants agreed with staff, CRP, and partner survey respondents that American Indians, especially people living on reservations, faced increased barriers related to lack of jobs, transportation, housing, and service providers. Additionally, there are service delivery challenges related to tribal and state WIOA and health and human services program coordination, cultural competency, and federal requirements for tribal jobs.

Recommendation: Develop organizational performance measures focused on racial and cultural equality.

BY DISABILITY TYPE: Staff and Partner respondents identified people with behavioral health disabilities as most unserved/underserved.

Feedback from focus group participants and interviewees aligned with feedback from survey respondents in terms of which disabilities are underserved or unserved.

BEHAVIORAL HEALTH: Staff, CRP, and partner stakeholders in focus groups noted that people with behavioral health needs are hard to serve and serving them is often made harder because of compounding issues such as housing and transportation.

Clients with behavioral health needs make up approximately one-third of the VRBS client population. This is a considerable percentage of clients with complex, compounding needs that are hard to serve well. VRBS is implementing an Individual Placement and Support (IPS) model in collaboration with State of Montana mental health and Medicaid to improve services to individuals with serious mental illness. IPS is expected to be an effective approach to serving the unserved and underserved population. Partners and staff expressed excitement about this new service coming online.

BRAIN INJURY: Brain injuries can cause physical dysfunction, including vision and hearing issues, cognitive challenges, and behavioral health issues. This complexity means it is hard to ascertain the number of people with brain injuries served by VRBS in the RSA data. Clients with brain injury often must work across additional partner agencies to access the full range of needed services. VRBS staff reflected on the complexity of serving these individuals in focus groups. Clients with brain injury who responded to the survey identified relatively more VRBS service gaps than those without brain injury and relatively more challenges than those without brain injury.

INTELLECTUAL AND DEVELOPMENTAL DISABILITIES (IDD): Over one-third of VRBS clients have a cognitive disability as their primary disability type. Staff and partners discussed how individuals with IDD receive limited DD services while waiting for a DD waiver slot, and thus are more reliant on VRBS services while waiting. VRBS / Pre-ETS are not designed to meet the full range of needs for individuals with IDD. Clients with IDD who responded to the survey said they had more service gaps and more challenges than respondents without IDD.

DEAFNESS: About four percent of VRBS clients have auditory or communicative disabilities as their primary disability type. Only approximately one percent of clients were deaf (44 clients, 1.3%) in the fourth quarter of program year 2022. Interpretation needs create a barrier to service for people who are deaf. Survey respondents who were deaf said they experienced relatively more VRBS service gaps and more challenges than did respondents who were not deaf.

DEAF-BLINDNESS: RSA data show that VRBS serves a very small number of people who have deaf-blindness (seven in program year 2022, quarter 4). Staff believe the actual number of deaf-blind people served is higher and there are issues causing this disability to be miscategorized in the data. Staff also say this is a challenging population to serve well because of extremely diverse needs. VRBS has a project focused on improving services to this population through a holistic tool to better serve this population.

BLINDNESS: Approximately four percent of the client population has visual impairments as their primary disability category, with about half being blind (72 clients, 2.2% in program year 2022, quarter 4). Staff discussed challenges in serving this population, including transportation

challenges for VRBS staff who are also blind (“I can’t serve clients in our outer counties because I am blind and don’t drive,”) transportation challenges for clients, and stigma associated with receiving benefits in the older blind population. Survey respondents who were blind also felt underserved in terms of VRBS service gaps, reporting relatively more VRBS service gaps than respondents who were not blind. Blind respondents also reported more challenges than did respondents who were not blind.

SIGNIFICANT DISABILITIES: As discussed in the previous report section, many staff and partners feel that people with the most significant disabilities are underserved.

HOMELESS: VRBS clients who said they are homeless represent about five percent of the 2022 point-in-time count of people who are homeless. While people who are homeless are only a small number of overall VRBS clients, staff in focus groups echoed survey respondents in their concerns about this population being underserved. It can be hard for unhoused people to participate in VRBS services because they do not have a stable place to live, may not have a consistent way to communicate and may have compounding factors such as basic needs challenges, behavioral health conditions, and physical health needs that require a holistic, team-based approach to fully address. The assessment of people experiencing homelessness as underserved by staff, CRPs, and partners aligns with the participant identification of service gaps; survey respondents who said they were unhoused identified the most significant perceived gaps in services compared to other subgroups. This respondent population also identified more challenges than respondents who were not unhoused or transient.

RURAL: Focus groups participants and interviewees reflected on the challenges of serving rural populations. Clients living in rural areas identified relatively more service gaps than clients not living in rural areas; however, people with disabilities in rural areas identified fewer overall challenges than survey respondents not living in rural areas.

AMERICAN INDIAN: As noted above, American Indian clients identified more service gaps and more challenges than survey respondents who were not American Indian, and stakeholders noted additional challenges for this group of clients, including lack of jobs, transportation, housing, and service providers, and insufficient tribal and state WIOA and health and human services program coordination, cultural competency, and federal requirements for tribal jobs.

YOUTH IN OR EXITING THE FOSTER SYSTEM: VRBS serves very few individuals (1% or 37 people) who are in or are known to have aged out of the foster system. One interviewee reflected on how youth exiting the foster system are often underserved because these youth are not being identified as former foster children.

REFUGEES: Focus group participants in Missoula shared that they have a large refugee population and that these individuals can be underserved because of language barriers.

HISPANIC/LATINO: Clients who said they were English language learners identified more VRBS service gaps and more challenges than respondents who were not English language learners and preliminary cost and outcome data suggest possible opportunities for improved service delivery for this client group.

LGBTQ+: Although staff, CRPs, and partners were less likely to say this subgroup was underserved than others, clients and non-participants identified significantly more challenges, and clients who are LGBTQ+ said they experienced more service gaps than respondents who did not identify as LGBTQ+.

VRBS staff and CRP respondents provided input on the actions that VRBS can take to improve provision of services to unserved and underserved people. Improving transportation options was identified by the vast majority of both staff (80%) and CRP (74%) respondents. Substantial proportions of staff (42%) and CRP (46%) respondents also suggested increasing interagency collaboration to better serve unserved and underserved individuals. CRP respondents also suggested increasing training regarding specific disabilities (46%) or diagnosis and increasing staff outreach to clients (36%).

Focus groups, interviews, and open-ended survey responses provide more detail to these recommendations for increasing access to VRBS services for underserved and unserved populations.

Recommendations:

- *Seek prior approval to utilize establishment authority to implement and expand IPS programs and services to better serve individuals with behavioral health disabilities.*
- *Collaborate with Behavioral Health and Developmental Disabilities to determine how to strengthen vocational services within the newly defined, less intensive Assertive Community Treatment service requirements. This could include VRBS training or centralized VRBS services for ACT teams.*
- *Participate in HB872/Behavioral Health System for Future Generations committee meetings to understand and influence behavioral health funding decisions.*
- *Analyze approaches to better serving individuals with brain injury in collaboration with partner agencies. Consider the need to develop a brain injury waiver or other focused program to coordinate diverse service needs.*
- *Support Developmental Disabilities Program efforts to reduce the 0208 DD Medicaid waiver waiting list, including processes to ensure Pre-ETS participants are on the waiting list.*
- *Work with partners to consider innovative, collaborative models of shared service delivery for rural and tribal regions. This may include cross-training, job sharing, or cross-agency service pathway development.*
- *Increase advocacy for and provide more supportive services.*
- *Analyze opportunities to better serve people with disabilities who identify as Hispanic/Latino, including hiring multi-lingual staff, having forms and online information in Spanish, and conducting increased outreach through partner organizations working with this population.*

- *Identify youth who are in or have exited the foster system and communicate this information to colleges.*
- *Reach out to partner agencies focused on serving people who identify as LGBTQ+ to determine approaches to better serving this population.*
- *Increase awareness and understanding of VRBS and enhance relationships with partners, tribes, businesses, people with disabilities, and families.*
- *Increase investment in cultural competency training for staff, consulting with partners about effective professional development options.*
- *Build program capacity to serve the vocational needs of people with disabilities through increased hiring and retention of staff and CRPs.*
- *Increase case review communication for clients receiving services from multiple agencies.*

C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE WORKFORCE DEVELOPMENT SYSTEM; AND

SUMMARY FINDINGS

- VRBS staff identified a strong partnership with Job services, post-secondary schools, and Adult Education. Clients are satisfied with how well their VRBS counselors connected them with other community organizations to help them get the services they need.
- Collaboration and shared service delivery across partners could be improved. VRBS staff and partners want more communication and collaboration to better serve shared clients and better use collective program resources. Collaboration challenges include understanding partner programs and how they overlap/intersect, communication and data sharing, and limited staff capacity.

WIOA PROGRAM INVOLVEMENT

Over the last two years, WIOA program participation has generally declined as a proportion of overall vocational rehabilitation participation, from 12 percent to 8 percent. However, participation for most programs has increased in absolute terms, growing by 9 percent across all programs and as high as 136 percent growth in Job Corps. The Dislocated Worker and Wagner-Peyser Employment programs also saw robust growth (100% and 89% growth, respectively). Adult Education grew 12 percent. In contrast, Youth program involvement fell 49 percent and adult program involvement fell 24 percent.

VRBS staff were asked to assess the strength of their partnership with community agencies. More than 50 percent of staff characterized their relationship with the following agencies as “strong”:

- Job Services (67%)
- Post-secondary schools (60%)
- Independent Living (53%)

- Montana Developmental Disabilities Program (52%)
- Adult Education (52%)

Roughly one-third of staff respondents sometimes (35%) or frequently (31%) refer clients to Job Services for employment-related services. The most common service referrals are from job search or referral activities or resume writing and interview preparation. Despite a positive view of the partnership between VRBS and Job Services, stakeholders noted the impact of turnover in both agencies on maintaining awareness of the services Job Services and VRBS provide.

Stakeholders reflected on the challenges associated with the current data sharing and referral processes, including not using the designated Job Services point of contact for referrals and the manual process for referring clients. Moreover, WIOA stakeholders, as well as other partner stakeholders, reflected on the challenges of effectively serving dispersed, rural communities. One interviewee suggested cross-training staff in VRBS and Job Services to improve services to clients.

One-third of staff respondents sometimes referred clients to Adult Education for employment related services (35%), and nearly one-third frequently or always did (29%). Most VRBS staff respondents (90%) indicated referring clients to Adult Education for HiSET classes. Other common Adult Education referral purposes included:

- TABE test (73%)
- Basic computer classes (65%)
- Occupational or vocational certification (55%)
- Remedial education classes (53%)

Adult education partners, like Job Services, expressed a desire for more communication and coordination.

Recommendations:

- *Continue or reinvigorate WIOA training and awareness activities.*
- *Institute or reinvigorate process to give and receive updates across WIOA programs.*
- *Evaluate opportunities to more effectively share information across disparate data systems, including leveraging functionality developed as part of the MPATH (Montana's Program for Automating and Transforming Healthcare) project and the common client and provider indices.*
- *Analyze opportunities to support a shared or universal application across WIOA programs, as well as potentially other health and human services partner agencies.*
- *Explore the possibility of developing shared WIOA counselor positions to address service delivery challenges in rural areas.*

D. YOUTH WITH DISABILITIES, INCLUDING STUDENTS WITH DISABILITIES AND THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER IDEA.

SUMMARY FINDINGS

- Nearly half (49%) of Montana’s accredited high schools have a Pre-ETS contract. VRBS has a total of 76 Pre-ETS school contracts in 73 percent of counties and 17 Pre-ETS provider contracts. In the context of locally controlled school districts, high school engagement is based on relationships with school administrators and special education teachers.
- Students with disabilities have inconsistent access to vocational services because of this limited, but growing number of school contracts, and inconsistencies across schools’ capacities to implement Pre-ETS services.
- Students with disabilities are less served in the summer and after school. Pre-ETS services are primarily provided by schools, with limited contractor engagement to supplement special education capacity. Students with disabilities often don’t receive vocational services in the summer or after school unless they are enrolled in VRBS.

YOUTH DISABILITY PREVALENCE AND CHARACTERISTICS

Multiple population and administrative data sources provide a picture of Montana youth with disabilities:

- Six percent of Montana youth ages 5 through 17 have a disability.
- Over five years, there has been a 12 percent increase in the number of teens and young adults with IEPs and a 36 percent increase in the number of teens and young adults with 504 Plans.
- The number of students with disabilities with IEPs declines with age, while the number of students with 504 Plans is relatively steady until age 18.
- A higher proportion of mixed-race Montana youth have disabilities compared to the national average.
- The most common disability types among youth are cognitive difficulties and self-care difficulties.
- Learning disabilities are the most common type of disability among Montana students.

CHALLENGES TO PRE-ETS SERVICES

In the two-year period between July 2021 and June 2023, the number of students with disabilities reported and the number and percentage receiving Pre-ETS has increased. The needs assessment collected information regarding challenges to Pre-ETS services from diverse stakeholders.

Students receiving Pre-ETS services, parents of students with disabilities, staff, and partners identify transportation and awareness of and connection to resources as students leave high school as the primary Pre-ETS challenges. Because Pre-ETS services are integrated with special education services for students in participating schools, student responses reflect the combined universe of special education and Pre-ETS services. In focus groups, students were often unfamiliar with the term Pre-ETS.

More than one-third of VRBS staff, CRP, and partner respondents indicated that “most” or “all” of youth under 18 with disabilities face the following barriers to Pre-ETS services:

- Lack of information or confusion about available services
- Transportation challenges
- Not knowing where to get help or find services after high school
- Lack of job skills
- Concern over impact on Social Security benefits

Stakeholders also discussed the following challenges to Pre-ETS services:

1. TRANSITIONS: Students in focus groups said they would go to their special education teachers or parents with questions about navigating services after high school. Those who were planning to pursue post-secondary education, particularly in schools they had visited within their Pre-ETS/special education programs, felt surer of their next steps than others. Students in the psychiatric residential treatment facility focus group expressed less certainty about their post-high school options.
2. TRANSPORTATION: Students, parents, and staff shared perspectives on transportation challenges and their impact on youth and their families or caretakers. Young people said it was hard to participate in vocational activities outside of school because of transportation challenges. Parents reported transporting their children creates additional burdens on them. Driver’s education is generally hard to access for all students, regardless of disability. Staff felt that private coaches are likely the best option for addressing this challenge.
3. SELF-CONFIDENCE: Students talked about how their worries and lack of confidence negatively impact them.
4. FAMILY ENGAGEMENT: Staff discussed how family engagement and family attitudes varied, particularly as it relates to transitioning students into VRBS services for ongoing support.

PRE-ETS SERVICES RECEIPT

ADMINISTRATIVE INFORMATION:

Montana’s Pre-ETS program is serving a growing number of students with disabilities with an increasing number of services. The most common and fastest growing service is job exploration counseling, growing 24 percent between program year 2021 and 2022. This is followed by 23

percent growth in counseling on post-secondary enrollment opportunities and 19 percent growth in both instruction in self-advocacy and work-based learning experiences. Workplace readiness training services grew 18 percent.

STUDENT PERSPECTIVE:

VRBS participants eligible for or receiving Pre-ETS services were both more likely to indicate receipt of pre-ETS services compared to adult clients and also more likely to identify that they needed but did not receive distinct Pre-ETS services. The Pre-ETS services identified as received by the largest share of respondents were learning about good work habits (84%) and exploring what their job interests are (82%). Across all Pre-ETS services, smaller shares of respondents received work-based learning services, and the largest shares of respondents received career exploration and workplace readiness services.

- Students learned about post-secondary options but identified gaps in receipt of application assistance. Two-thirds (62%) of Pre-ETS participant respondents said they had learned about different post-secondary options and half (51%) had learned which post-secondary options would help them get the career they want. One-fifth of respondents needed to learn how to apply for college or their chosen post-secondary option but had not received the service (20%) or needed to learn how to apply for financial aid but had not received the service (22%).
- Relatively high proportions of Pre-ETS participants received career exploration services. Most respondents (82%) explored their job interests, and about seven in ten learned about available jobs (71%) or learned which jobs are a good fit (70%). About half of respondents (52%) listened to guest speakers talk about their jobs.
- Work-based learning services were less accessed. Pre-ETS respondents were less likely to identify receipt and more likely to identify a service gap (they needed but did not receive a service) for work-based learning services versus other Pre-ETS services. Some focus group participants echoed the survey respondents' desire for more work based learning services.
- Students received workplace readiness services. Most Pre-ETS respondents (84%) indicated receipt of services to help them learn about good work habits, and a majority had received the breadth of workplace readiness options. The greatest services gap was noted for services to learn about budgeting (20% of respondents said they needed but did not receive the service) and practice interviews (19% needed but did not receive the service).
- Students were informed about their accommodations. More than half (57%) of Pre-ETS respondents had learned about the accommodations they needed. Half (50%) learned how to talk about their disability. Fewer indicated leading their own IEP (26%) or learning to schedule their own appointments (38%).

LEARNING ABOUT POST-SECONDARY OPTIONS: Students in focus groups shared their positive experiences exploring options for education, training, or work after high school. Students in one focus group talked about how they wish they had a career center that could support them learn about different career pathways, including nursing and automotive skillsets.

Recommendation: Explore opportunities to develop career or innovation centers.

COLLEGE APPLICATIONS: Some Pre-ETS focus group participants expressed a desire for more college application support.

FINANCIAL AID APPLICATIONS: Students talked about how they would like to learn about financial aid options and how to apply for them.

FINANCIAL LITERACY: Like survey respondents, many Pre-ETS focus group participants expressed a desire for financial literacy classes, specifically naming that they want to know how to pay taxes, write checks, and balance a checkbook. Multiple students said they wanted the opportunity to take life skills courses with this content.

Recommendation: Clarify the scope of financial literacy services to increase consistency of services. Work with WIOA partners to ensure that a full continuum of financial literacy courses is available to meet diverse needs.

WORK HABITS: Students commonly said they learned good work habits from working. Students shared many successful experiences they had through support from their special education teachers.

STAFF, CRP, AND PARTNER PERSPECTIVE:

Despite VRBS staff and partner respondent perception of widespread need for Pre-ETS services, they indicated limited-service adequacy to address the needs of students and youth under 18 with disabilities. Adequacy of services in general varies depending on who is delivering the services. Schools with motivated special education teachers provide the majority of Pre-ETS services. Some regions use contracts to support service provision, which often results in fewer available services because of limited contractor provider capacity or limited willingness to provide youth services if also contracted for adult VRBS services.

PRE-ETS SPECIALISTS: Eight Pre-ETS specialists cover the entire state, with most traveling across large geographic areas to develop and maintain relationships with contracted high schools. Most staff also maintain a caseload for students who receive VRBS services in addition to Pre-ETS, with a cap of 50 clients. Pre-ETS specialists, like VRBS staff in general, express a sense of being overwhelmed and unable to complete their responsibilities successfully.

HIGH SCHOOL ENGAGEMENT AND CAPACITY: Schools with Pre-ETS contracts generally integrate Pre-ETS services with special education programming. Pre-ETS specialists reflected on the variable capacity of schools to serve students with disabilities in general and to take on Pre-ETS programming on top of special education responsibilities. Pre-ETS specialists talked a lot about the importance of relationships with school administrators and special education teachers, teacher willingness to engage in work outside of the classroom, and the importance of understanding how Pre-ETS services can benefit schools and their students. However, turnover with school staff and Pre-ETS specialists makes consistent relationships and teacher/school understanding of Pre-ETS services harder.

Recommendation: Continue to build relationships with statewide and local education entities to increase awareness and understanding of Pre-ETS services and how they benefit schools and students with disabilities. Consider creating tools to help schools understand the program, developing detailed instructions for how to use funds, and sharing data with schools and teachers to understand the impact of Pre-ETS funding.

STUDENT RECORDS: Stakeholders suggest that rural schools don't want to share student SSNs, which are needed for Pre-ETS services, so special education teachers have to talk to parents individually to understand why their child's SSNs had to be shared and how they would keep this information secure, which can be a barrier for some students to participate.

Furthermore, special education and RSA disability codes do not align. Special education can use a general category of health impairment, which is not an RSA category. Pre-ETS specialists need to go back to teachers to get a specific disability listed.

Recommendation: Analyze options for more efficient, automated Pre-ETS application and enrollment with built-in business rules and error coding.

PRE-ETS FUNDING: Pre-ETS has a tiered reimbursement rate based on school classification. AA school districts receive a lower reimbursement than class A, B, or C districts. In addition, the CRP section of the report reflects on contracting challenges for Pre-ETS services because of, at least in part, lower reimbursement rates for Pre-ETS compared to VRBS. Lower reimbursement rates may be less of an issue for larger schools; however, additional funding flexibility and external supports could improve service delivery. Some mid-sized and smaller schools developed new services or programs because of Pre-ETS contracts.

Recommendations:

- *Analyze Pre-ETS costs and outcomes by school district classification to evaluate the effectiveness of tiered reimbursement rates.*
- *Consider contracting mechanisms to engage special education teachers and school staff in summertime and after school Pre-ETS service provision as part of the broader re-evaluation of Pre-ETS contracting approaches.*

OVERLAP WITH VRBS: Some students with disabilities apply for and receive VRBS services to obtain services that are only paid through VRBS for individuals with IPEs. Pre-ETS specialists shared varied approaches to communicating with schools, teachers, and students about why and when students should be referred to VRBS. Staff expressed that increased Pre-ETS contractor capacity may lessen the demand for VRBS services by high school students.

Recommendations:

- *Determine if there are more efficient and effective approaches to layering VRBS and Pre-ETS funding to provide services to broadly needed by Pre-ETS participants, like driver's education and summer training.*

- *Support consistent staff understanding of and communication about VRBS referrals for Pre-ETS participants.*

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

The most recent Comprehensive Statewide Needs Assessment (CSNA) was completed by Bloom Consulting as a result of a request for proposal (RFP). Bloom Consulting commenced the Montana CSNA project on August 1, 2022 and completed the project with a final written report to Montana VRBS on December 31, 2023. Summary findings and recommendations listed throughout section b. Comprehensive Statewide Needs Assessment (CSNA) have been pulled directly from Bloom Consulting's final report.

SUMMARY FINDINGS

- All counties have at least one CRP serving clients in that county. Missoula County has nine CRP contracts serving the county, the highest number among counties. Over one in three counties have two contracts (36%), and about one in five have three contracts (21%) or one contract (18%).
- Staff and CRP respondents consider CRPs successful in helping individuals get and keep jobs. The vast majority of VRBS staff and CRP respondents agreed or strongly agreed that CRPs help people get and keep jobs, and that CRPs are knowledgeable about providing appropriate services for VRBS clients. Most respondents in both groups also noted that there are an inadequate number of CRPs to meet the needs of people with disabilities seeking employment, and that CRP agencies have inconsistent staff and struggle with staff turnover.
- CRPs face similar caseload challenges. Like VRBS staff respondents, the majority of CRP respondents identified high caseloads as a challenge to providing vocational rehabilitation services. Utilizing establishment authority to train existing and bring on additional CRP providers to support improved client access and outcomes.
- VRBS clients report positive experiences with job coaches. Clients considered job coaches to be knowledgeable, able to see them quickly, and respectful of their culture and background.

CRPs were asked to provide input on their experience as a CRP and VRBS staff were asked to share their experience working with CRPs. The vast majority of VRBS staff and CRP respondents agreed or strongly agreed that CRPs help people get and keep jobs, and that CRPs are knowledgeable about providing appropriate services for VRBS clients. Most respondents in both groups noted that there are an inadequate number of CRPs to meet the needs of people with disabilities seeking employment, and that CRP agencies have inconsistent staff and struggle with staff turnover. Both staff and CRPs also disagreed that it is easy to coordinate services between VRBS and CRPs and disagreed that the VRBS contracting process is easy for CRPs. Perspectives between staff and CRP respondents varied somewhat on other measures. Almost half (49%) of staff respondents felt that CRP staff have the skillsets to work with individuals with various types of disabilities, compared to 87 percent of CRP respondents. Thirty-six percent of staff agreed or strongly agreed that CRP staff

have the skillsets to work with individuals from diverse backgrounds, compared to 87 percent of CRP respondents, and one-third (34%) of staff agreed or strongly agreed that CRPs understand the vocational services delivered by VRBS, compared to two-thirds (68%) of CRP respondents.

Focus group attendees and interviewees consistently discussed the lack of CRPs as being problematic for client service delivery. Opening up the order of selection increased the number of VRBS clients and the caseloads of CRPs and staff supporting them. When there are not enough CRPs to serve clients or cover a region, VRBS counselors fill this role. This creates an inconsistent delegation of responsibilities for VRBS staff across the state, and even within one regional office.

Recommendation: Consider developing a self-direction services option to increase capacity of CRPs. This could be modeled after self-direction in other Montana Medicaid waiver and state plan services.

Recommendation: Utilize establishment authority to train existing and new CRPs as well as add new CRPs to enhance service-delivery capacity.

VRBS does not have any state owned or operated CRPs. Nevertheless, there are several nonprofit community rehabilitation programs in Montana per the definition of nonprofit in 34 CFR 361.5(c)(36): Nonprofit, with respect to a community rehabilitation program, means a community rehabilitation program carried out by a corporation or association, no part of the net earnings of which inures, or may lawfully inure, to the benefit of any private shareholder or individual and the income of which is exempt from taxation under section 501(c)(3) of the Internal Revenue Code of 1986.

Per 34 CFR 361.5(c)(16)(iii), VRBS plans to seek prior approval in PY 2024-2027 for the “improvement of a public or nonprofit community rehabilitation program that are necessary to make the program functional or increase its effectiveness in providing vocational rehabilitation services to applicants or eligible individuals but are not ongoing operating expenses of the program.”

(16) Establishment, development, or improvement of a public or nonprofit community rehabilitation program means—

(iii) Other expenditures and activities related to the establishment, development, or improvement of a public or nonprofit community rehabilitation program that are necessary to make the program functional or increase its effectiveness in providing vocational rehabilitation services to applicants or eligible individuals, but are not ongoing operating expenses of the program.

Some CRPs are also contracted to provide services to students participating in Pre-ETS services. Many of these Pre-ETS CRPs are less likely to take youth referrals because of the lower rate paid for serving this population (\$15/hour less than paid for VRBS services) and because of the inconsistencies associated with young people (e.g., high no-show rate), making it hard to estimate the workload.

Recommendation: Reconsider the contracting approach for Pre-ETS services outside of schools. This may include a focus on contracting with youth-focused agencies and/or considering a deliverable-based payment approach versus using an hourly reimbursement.

VRBS clients report positive experiences with job coaches. Roughly one-third (32%) of clients reported using services from a job coach. Among those clients, 59 percent said that their job coach helped them to get or keep a job (not shown in figure). Clients were generally satisfied with their services from job coaches, with 77 percent agreeing or strongly agreeing that their job coach respected their culture and background, 69 percent agreeing or strongly agreeing that their job coach was knowledgeable about the supports they needed, and 66 percent agreeing or strongly agreeing that their job coach was able to see them quickly after their referral. Clients in focus groups who were able to use CRP services agreed with this positive feedback.

Like VRBS staff respondents, CRP respondents reported high caseloads as the most commonly endorsed challenge (59%) to providing vocational rehabilitation services. More than half of CRP respondents also identified lack of community services (54%), lack of financial resources, the increased number of individuals with multiple disabilities, and too much paperwork and data entry as challenges to service provision (51% each).

COLLABORATION: CRP respondents were asked how collaboration between CRPs and VRBS could be improved. Some said they would like to increase the sense of shared ownership for cases and their success with VRBS staff. Some requested more regular meetings (e.g., monthly) between VRBS counselors and CRP staff, with CRPs reimbursed for meeting participation. Others wanted improved frequency and quality of communication from VRBS counselors to CRPs with clarity around service requests, appropriate referrals, and needed information. Joint trainings with CRPs and VRBS counselors were also suggested as a way to increase collaboration.

Recommendation: Analyze opportunities to improve communication and collaboration with CRPs, including regular case review meetings, improved referral processes, data sharing through Madison, and joint trainings.

COMPENSATION: As the cost of living has rapidly increased throughout Montana, wages struggle to keep up. CRPs and VRBS staff both felt that CRP rates needed to increase to retain and ideally expand CRP capacity.

Recommendation: Continue to increase CRP rates.

DATA SYSTEMS AND PROCESSES: Many of the issues and recommendations included in the VRBS staff section above apply to and would benefit CRPs, specifically regarding authorizations, case notes, and invoicing. CRPs would also like streamlined billing requirements.

Recommendation: Work with partners to enhance Madison system to support shared service delivery and coordination through Madison, including centralized/consolidated case notes, authorized hours, utilization of authorized hours, and invoicing.

C. GOALS, PRIORITIES, AND STRATEGIES

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of Section 116 of WIOA; and (3) other

available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107 of the Rehabilitation Act. VR agencies must—

1. DESCRIBE HOW THE SRC AND THE VR AGENCY JOINTLY DEVELOPED AND AGREED TO THE GOALS AND PRIORITIES AND ANY REVISIONS; AND

In 2022, VRBS posted a Request for Proposal to hire a contractor to complete the Comprehensive Statewide Needs Assessment (CSNA). Prior to pursuing this activity, the idea was shared with the SRC at a quarterly meeting and the SRC were unanimously supportive of VRBS pursuing this idea. Once the procurement process was complete and a contractor was selected, the contractor was added to the agenda of the summer 2022 SRC meeting where the contractor presented to the SRC on the process and timeline for the CSNA and SRC members' input and feedback was solicited. Additionally, SRC was included in data collection by receiving and completing surveys as well as participating in focus groups.

Following the completion of the CSNA in December 2023, VRBS held a strategic planning session on January 5, 2024 and invited various stakeholders, including the entire SRC, to participate. Approximately 8 SRC members attended and participated in developing a new strategic plan. During the strategic planning session, the findings and recommendations from the CSNA were comprehensively reviewed with the attendees as well as the previous strategic plan goals and strategies. Attendees, including SRC members, then participated in discussions related to refining goals and prioritizing strategies that align with VRBS' vision, mission, and core values.

Following the strategic planning session on January 5, 2024, VRBS leadership met twice to further discuss and refine the strategic plan goals and associated strategies. VRBS leadership then presented the strategic plan to the full SRC on February 8, 2024 at the first quarterly meeting for their review, feedback, revisions, and approval.

2. IDENTIFY MEASURABLE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS AND THE BASIS FOR SELECTING THE GOALS AND PRIORITIES (E.G., CSNA, PERFORMANCE ACCOUNTABILITY MEASURES, SRC RECOMMENDATIONS, MONITORING, OTHER INFORMATION). AS REQUIRED IN SECTION 101(A)(15)(D), (18), AND (23), DESCRIBE UNDER EACH GOAL OR PRIORITY, THE STRATEGIES OR METHODS USED TO ACHIEVE THE GOAL OR PRIORITY, INCLUDING AS APPLICABLE, DESCRIPTION OF STRATEGIES OR METHODS THAT—

A. SUPPORT INNOVATION AND EXPANSION ACTIVITIES;

B. OVERCOME BARRIERS TO ACCESSING VR AND SUPPORTED EMPLOYMENT SERVICES;

C. IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POST-SECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES); AND

D. IMPROVE THE PERFORMANCE OF THE VR AND SUPPORTED EMPLOYMENT PROGRAMS IN ASSISTING INDIVIDUALS WITH DISABILITIES TO ACHIEVE QUALITY EMPLOYMENT OUTCOMES.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

For 2024-2027, the SRC and VRBS jointly agreed upon the following goals using the CSNA, performance accountability measures, SRC recommendations, and strategic planning to guide goal development:

1. Equitable Access and Quality. All Montanans with disabilities can access high-quality competitive, integrated employment.

Objectives	Strategies	Basis
1.1 Increase awareness and understanding of VRBS.	1.1.1 Develop and implement a plan to continue to enhance relationships with partners, tribes, businesses, and people with disabilities, including satellite office hours or increased outreach.	B. Overcome barriers to accessing VR and supported employment services;
1.2 Improve quality and delivery of VRBS services.	1.2.1 Identify an approach for more consistent soft skills/workplace readiness training skills and collaborate with Workforce Innovation and Opportunity Act (WIOA) partners to implement. 1.2.2 Provide consistent benefits counseling services to more individuals, including those not yet employed. 1.2.3 Explore how to make the Transportation Coordinator position best serve individuals needing transportation services. 1.2.4 Explore and promote innovative, collaborative transportation service options, including volunteer programs. 1.2.5 Analyze opportunities to increase access to driver's	B. Overcome barriers to accessing VR and supported employment services; D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

Objectives	Strategies	Basis
	<p>education instruction.</p> <p>1.2.6 Build a robust blind vendor program that is accessible statewide.</p> <p>1.2.7 Maintain momentum on the implementation of Individual Placement and Support (IPS) services.</p>	
<p>1.3 Increase the percentage of VRBS clients employed, retained, and promoted in competitive, integrated jobs</p>	<p>1.3.1 Work with partners to define a statewide Employment First policy</p> <p>1.3.2 Continue to move people out of sheltered workshops and day programs and into competitive, integrated employment, with the goal of no longer needing sheltered workshops in Montan.</p> <p>1.3.3 Analyze program outcomes, including wages after exit, by race, ethnicity, and disability type.</p>	<p>B. Overcome barriers to accessing VR and supported employment services;</p> <p>D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.</p>

Montana VRBS will gauge its success toward Goal 1 on Access and Equity and its associated objectives and strategies by monitoring progress and completion of the following work tasks associated with Goal 1:

- Reach out to Wayne Dagel, AIVRTTAC’s Director, to begin collaboration on tribal activities and engagement.
- Review, re-write and execute tribal MOUs that address and include Pre-ETS and Business Services.
- Regularly meet and review local WIOA work plans to remain engaged.
- Continue to review data from dashboards to look for improvement from the local WIOA work plans.
- Outreach to each of the tribal health organization clinics to ensure access to BLV services.

- Explore the best procurement option for obtaining soft skills statewide for VRBS participants.
- Review and analyze current benefits counseling methodology to determine if it is accurate.
- Outreach to other organizations that provide benefits counseling to learn the best ways to contract.
- Update deliverables in the benefits planning contract and explore other partners.
- Pilot Desiree (internal staff with benefits planning certification) taking 2 benefits planning referrals and report back on process.
- Explore how to make the Transportation Coordinator position best serve individuals needing transportation services.
- Assign project for researching and analyzing driver's' education options in Montana to Transportation Coordinator and monitor progress.
- Write procedure and internal controls for Blind Enterprise Program
- Complete audit on previous BEP vendor.
- Establish 2 new BEP vendors.
- Continue to follow up with, encourage, and support Many Rivers to implementation of IPS program.
- Finalize VR's IPS procedure.
- Serve 100 individuals through VR-IPS.
- Implement 3 new IPS providers by end of this plan.
- Draft administrative rules to present to DDP and SDMI to start the discussion on Employment First in Montana.
- Write 2 EPPs, one that eliminates sub-minimum wage and one that eliminates sub-minimum wage and addresses segregation and submit to DPHHS Director for inclusion in House Bill 2.
- Create and present report for analyzing program outcomes including wages after exit, by race, ethnicity, and disability type.

2. Youth Engagement. Montana youth with disabilities are effectively engaged in vocational exploration and work readiness training.

Objectives	Strategies	Basis
2.1 Increase participation of students (14-21) with	2.1.1 Continue to build relationships with statewide	C. Improve and expand VR services for students with

Objectives	Strategies	Basis
disabilities engaged in high quality Pre-ETS.	<p>and local education entities to increase awareness and understanding of Pre-ETS services and how they benefit schools and students with disabilities.</p> <p>2.1.2 Develop tools to share information with youth, families, educators, and service providers about available services.</p> <p>2.1.3 Explore additional community agencies to provide Pre-ETS services</p>	disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment, and pre-employment transition services); and
2.2 Increase participation for youth in foster system.	<p>2.2.1 Enhance the approach to capturing and analyzing data to better identify and serve foster youth.</p> <p>2.2.2 Engage with partners in the foster care network to identify and engage youth who could benefit from VRBS.</p>	C. Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment, and pre-employment transition services); and

Montana VRBS will gauge its success toward Goal 2 on Youth Engagement and its associated objectives and strategies by monitoring progress and completion of the following work tasks associated with Goal 2:

- Leverage work-based learning collaborative and capacity building institute to build partnerships.
- Develop a strategy to working with people on 504s including developing training with SEAs and LEAs to ensure they understand the 504 process.
- Kick off the first annual disability mentoring week in 2024.
- Utilize transition-readiness toolkit pre- and post- surveys to measure the effectiveness of Pre-ETS provided.

- Analyze MSDB’s O&M needs and develop plan to support but not supplant services.
- Hire Training and PR Specialist in DETD.
- Work with Training and PR Specialist to develop outreach materials and tools to share and update Pre-ETS website.
- Implement project with CBI to make it more comprehensive to include all transitions.
- Reach out to community organizations with intention including, YMCAs, Boys & Girls Clubs, United Ways, etc. that are already serving youth in this manner to determine ways to better collaborate and serve more students.
- Analyze and enhance the approach to capturing and analyzing data to better identify and serve foster youth.
- Attend meetings regularly with Brandy and Rhonda and strategizing on ways to reach those students.

3. Coordination. Montana’s workforce system is coordinated to effectively support people with disabilities and their employers.

Objectives	Strategies	Basis
3.1 Increase coordination with partner organizations.	3.1.1 Develop and implement an approach to sharing resources and work with partners doing related work with shared clients in smaller/rural communities. 3.1.2 Analyze options to develop a coordinated, streamlined WIOA referral process. 3.1.3 Hold regular collaboration meetings with partners, including a focus on partner and VRBS services and trainings. 3.1.4 Continue to engage with Job Service Employers’ Committees (JSEC) and Community Management	B. Overcome barriers to accessing VR and supported employment services; D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

Objectives	Strategies	Basis
	Teams (CMTs) local committees.	
3.2 Enhance coordination with businesses/employers.	3.2.1 Provide increased training to employers to understand the benefits of hiring people with disabilities. 3.2.2 Continue to manage collecting employer data in the Madison data system. 3.2.3 Identify a solution for the VRBS counseling staff to follow through with business connections made through the business services team	B. Overcome barriers to accessing VR and supported employment services; D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

Montana VRBS will gauge its success toward Goal 3 on Coordination and its associated objectives and strategies by monitoring progress and completion of the following work tasks associated with Goal 3:

- Implement an approach to sharing resources and work with WIOA and Tribal partners with shared clients in smaller/rural communities.
- Implement universal referral form for all WIOA partners
- Reconvene with DLI and Adult Ed to reinvigorate partner meetings across the state.
- Schedule meetings with tribal partners and establish regular meeting cycle.
- Determine where VR staff are already engaged with JSEC and CMTs and fill gaps with Central Office staff.
- Assign Business Services team members as well as Business Services Specialists to attend as many career/job fairs in Montana as possible.
- Provide training to VRBS staff on the importance and benefits of customized training.
- Assign Business Services Specialists to meet with all the MT colleges in their respective areas for the purpose of connecting industry, education, and training to advance employment fill employment gaps for PWD.
- Continue to manage collecting employer data in the VR case management system, Madison.

- Identify a solution for the VRCs to follow through with business connections made through the Business Services team.

4. Organizational Sustainability. VRBS is a stable, sustainable organization.

Objectives	Strategies	Basis
4.1 Increase staff recruitment, retention, and professional development.	<p>4.1.1 Improve the onboarding and orientation process to integrate new hires into our organizational culture and provide support.</p> <p>4.1.2 Refine training for adult learners and create tools and trainings in different modalities to increase understanding and integration.</p> <p>4.1.3 Define the training and support needs for VRBS support staff and implement improvements.</p> <p>4.1.4 Continue to integrate the VRBS culture into everything we do. Talk with staff about our mission, vision, and values, and how this relates back to the individuals VRBS serves.</p>	<p>B. Overcome barriers to accessing VR and supported employment services;</p> <p>C. Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment, and pre-employment transition services); and</p> <p>D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.</p>
4.2 Increase CRP capacity.	<p>4.2.1 Explore options to increase to CRP capacity through establishment authority.</p> <p>4.2.2 Continue to explore developing a self-direction services option to increase capacity of CRPs.</p>	<p>A. Support innovation and expansion activities;</p> <p>B. Overcome barriers to accessing VR and supported employment services;</p> <p>C. Improve and expand VR services for students with disabilities, including the coordination of services</p>

Objectives	Strategies	Basis
		<p>designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment, and pre-employment transition services); and</p> <p>D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.</p>
4.3 Enhance Madison	<p>4.3.1 Continue to improve Madison’s functionality by looking for and implementing efficiencies and providing training on new work processes.</p> <p>4.3.2 Include CRP invoicing in Madison.</p> <p>4.3.3 Explore artificial intelligence interfaces with Madison.</p>	<p>B. Overcome barriers to accessing VR and supported employment services;</p> <p>C. Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment, and pre-employment transition services); and</p> <p>D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.</p>

Objectives	Strategies	Basis
4.4 Increase organizational and fiscal stability.	<p>4.4.1 Focus on achieving excellence on the WIOA performance measures.</p> <p>4.4.2 Continue to enhance internal controls for financial monitoring.</p>	<p>B. Overcome barriers to accessing VR and supported employment services;</p> <p>C. Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment, and pre-employment transition services); and</p> <p>D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.</p>

Montana VRBS will gauge its success toward Goal 4 on Organizational Stability and its associated objectives and strategies by monitoring progress and completion of the following work tasks associated with Goal 4:

- Implement quarterly cycle of Foundations (VRBS' VRC basics training).
- Develop a training timeline for staff and supervisors.
- Develop an internal checklist for VR specific training.
- Complete an analysis of VR 101 Modules to determine effectiveness and impact with focus group of newer staff.
- Identify training for all managers to do to understand adult learning methods and get that training completed in the next year.
- Post, recruit, and fill support staff lead positions in Billings and Missoula.
- Revisit and update the support staff task list.

- Continue to integrate the VRBS culture into everything we do, including talking with staff about our mission, vision, and values, and how they relate back to the individuals VRBS serves.
- Determine amount and type of establishment grants needed to support IPS implementation.
- Get Establishment Authority through the 2024 State Plan.
- Follow appropriate State procurement to award establishment grants.
- Separate out business plan writing from the CRP contract into its own contract with its own scope of work and fee schedule.
- Separate out soft skills from the CRP contract into its own contract with its own scope of work and fee schedule.
- Separate out driver's training from the CRP contract into its own contract with its own scope of work and fee schedule.
- Implement newly developed, ACRE-certified Customized Employment training.
- Target recruitment of CE providers from different populations (outside traditional CRPs), such as paraprofessionals, teachers, retired teachers, parents, etc.
- Schedule a meeting with CIL Directors to discuss self-directed service option.
- Continue to improve Madison's functionality by looking for and implementing efficiencies and providing training on new work processes.
- Include CRP billing in Madison.
- Explore artificial intelligence interfaces with Madison.
- Provide ongoing training to staff related to 6 common performance measures
- Weave the 6 performance measures into the perspective of all things VR to inform but not direct decision making in performance appraisals, touch base meetings, case reviews, etc.
- Every staff can list the 6 common performance measures.
- Continue to enhance internal controls for financial monitoring.

D. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

1. PROGRESS IN ACHIEVING THE GOALS AND PRIORITIES IDENTIFIED FOR THE VR AND SUPPORTED EMPLOYMENT PROGRAMS;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies.

Goal 1: Equitable Access and Quality - All Montanans with disabilities can access high-quality competitive, integrated employment.	
Goal 1, Objective 1: Increase awareness and understanding of VR.	
Strategies	Progress
1.1.1 Develop and implement a plan to continue to enhance relationships with partners, tribes, businesses, and people with disabilities, including satellite office hours or increased outreach.	<p>VR Leadership and Data Unit regularly review the RSA 911 data dashboards to look for improvement from the local WIOA work plans.</p> <p>VR Data Unit provided mini refresher-training on each of the data reporting forms in the case management system.</p> <p>Montana’s WIOA partners met with Wyoming’s WIOA partners, who do not have a shared data warehouse either, to share ideas on how to efficiently and effectively coordinate data among the partners.</p> <p>VR Data Unit developed a data comparison dashboard for Montana’s data on the six common performance measures for all the WIOA programs. This was presented to Montana’s WIOA partners and will be updated on an ongoing basis.</p> <p>VR Data Unit completed an in-depth analysis using the RSA 911 data to determine the return on investment (ROI) for the 4-Year College Training service. Through that analysis it was learned that there is very little ROI for this service, and VR Leadership are currently engaged in an intensive rewriting process for the College Training procedure to ensure effective career counseling and college preparation are occurring prior to providing college training services to participants.</p> <p>VR Data Unit has developed data dashboards for the 9 local VR field offices.</p> <p>Blind and Low Vision (BLV) staff are engaging in targeted efforts with Crow Tribe and Blackfeet Nation through their Tribal Health Organizations to ensure access to BLV services.</p> <p>VR is collaborating with the Director of the American Indian Vocational Rehabilitation Training and Technical</p>

	Assistance Center (AIVRTTAC). The AIVRTTAC Director was officially appointed to Montana’s SRC in 2025 and is an active member of Montana’s Employment 1 st Workgroup.
Goal 1, Objective 2: Improve quality and delivery of VR services.	
Strategies	Progress
1.2.1 Identify an approach for more consistent soft skills/workplace readiness training skills and collaborate with Workforce Innovation and Opportunity Act (WIOA) partners to implement.	<p>VR implemented a soft skills workgroup that includes VR leadership, VR counseling staff, and Department of Labor and Industry (DLI) partners. This group has listened to presentations on various soft skills curriculums and virtual platforms offering soft skills classes and is currently collaborating with DLI to ensure ease of access to DLI soft skills tools available including Jobs for Montana Graduates (JMG) program.</p> <p>VR soft skills workgroup is in the process of developing a soft skills tool kit for VR counseling staff, a soft skills procedure, and clarifying CRP-provided soft skills services.</p>
1.2.2 Provide consistent benefits counseling services to more individuals, including those not yet employed.	<p>VR piloted getting one Central Office staff trained in Benefits Planning to assist with service provision. This was not a successful project.</p> <p>VR contracted with the local Work Incentives Planning and Assistance (WIPA) program to hire one certified benefits planner to serve only VR referrals. This pilot was semi-successful, but it was determined that the contract needed to be re-written to clarify desired VR deliverables.</p> <p>As of early 2026, VR has a new contract with the local WIPA program to provide benefits planning on a fee-for-service basis. If successful, VR plans to offer benefits planning contracts to other programs in Montana that have certified benefits planners.</p>
1.2.3 Explore how to make the Transportation Coordinator position best serve individuals needing transportation services.	Restructuring in Disability Employment and Transitions Division (DETD) occurred, moving supervision of the Transportation Coordinator out of the Operations Bureau and into the VR Field Bureau under the Deputy Division Administrator.

<p>1.2.4 Explore and promote innovative, collaborative transportation service options, including volunteer programs.</p>	<p>No progress updates.</p>
<p>1.2.5 Analyze opportunities to increase access to driver’s education instruction.</p>	<p>Transportation Coordinator created a VR transportation resource that is updated regularly and lists all available transportation vendors including all Driver’s Education program in Montana that can provide services to VR participants.</p>
<p>1.2.6 Build a robust blind vendor program that is accessible statewide.</p>	<p>An audit of the third-party contractor used to manage Business Enterprise Program (BEP) in past years was completed.</p> <p>BEP is undergoing significant transition as all contracted services have been brought within DETD.</p> <p>BEP will complete the limited-solicitation purchase of 8 new vending machines for replacing existing Blind Vendor outdated, irreparable machines. This procurement has been ongoing for several months.</p> <p>BEP will launch a Request for Proposal to contract with a vendor for long-term, ongoing purchase and repair of vending machines in 2026. The procurement process has been ongoing for several months.</p> <p>BEP Program Manager is building relationships with BEP programs in other states and has connected with the Rehabilitation Services Administration BEP expert to assist with reviewing and publishing new BEP policy and procedure in Montana.</p> <p>There are three BLV participants currently interested in establishing a vendor route. Two participants completed Chicago Lighthouse and one is currently in Chicago Lighthouse. All are exploring vendor route business feasibility.</p>
<p>1.2.7 Maintain momentum on the implementation of Individual Placement and Support (IPS) services.</p>	<p>VR, Mental Health, Medicaid, and contracted IPS trainers meet biweekly with the newest IPS Program to provide support and guidance through implementation. The IPS Program experienced considerable difficulties with start-up including hiring and maintaining staff. As of late 2025, an employment specialist and an employment specialist</p>

	<p>supervisor were hired and actively referring clients to VR for IPS services.</p> <p>VR, Mental Health, Medicaid, and contracted IPS trainers will continue meeting biweekly with the new IPS Program to ensure full implementation and sustainability of the program.</p> <p>VR, Mental Health, and Medicaid are applying for the newest iteration of National Expansion of Employment Opportunities Network (NEON) through the federal Department of Labor (DOL) to gain ongoing technical assistance to grow the number of IPS programs in Montana.</p>
<p>Goal 1, Objective 3: Increase the percentage of VR clients employed, retained, and promoted in competitive, integrated jobs</p>	
<p>Strategies</p>	<p>Progress</p>
<p>1.3.1 Work with partners to define a statewide Employment First policy.</p>	<p>Montana applied for and was selected as a Core State for the final year of the previous iteration of NEON. From January 2025 through August 2025, Montana VR Leadership worked with subject matter experts to complete an environmental scan for preparedness to adopt Employment 1st policy.</p> <p>Prior to the end of NEON in 2025, VR entered into a contract with the Harkin Institute to continue the Employment 1st work. A workgroup for Employment 1st has been established and has met in-person twice. One virtual and two more in-person workgroup meetings are scheduled to occur in 2026 with an end goal of developing an Employment 1st Strategic Plan.</p> <p>The Employment 1st work group has created and published an Employment 1st white paper. A Montana Employment 1st website is in development as well.</p> <p>Montana is also applying for the newest iteration of National Expansion of Employment Opportunities Network (NEON) through the federal Department of Labor (DOL) to gain ongoing technical assistance to maintain progress towards Employment 1st policy.</p>

<p>1.3.2 Continue to move people out of sheltered workshops and day programs and into competitive, integrated employment, with the goal of no longer needing sheltered workshops in Montana.</p>	<p>VR Director proposed two ideas to the Governor’s Office prior to the 2025 legislative session, one asking for elimination of sub-minimum wage exclusively and one asking for elimination of sub-minimum wage while addressing segregated work settings. Neither proposal was adopted into the Governor’s budget.</p> <p>Employment 1st workgroup is actively addressing sheltered employment and viable pathways to CIE in Montana.</p>
<p>1.3.3 Analyze program outcomes, including wages after exit, by race, ethnicity, and disability type.</p>	<p>No progress updates. Analysis of VR program outcomes has been done internally by the VR data unit, but no conclusions have been drawn or shared due to the relatively small sample sizes in particular sub-sets of race, ethnicity, and disability type.</p> <p>VR Data Unit completed an in-depth analysis of outcomes using the RSA 911 data to determine the return on investment (ROI) for the 4-Year College Training service.</p>

<p>Goal 2: Youth Engagement - Montana youth with disabilities are effectively engaged in vocational exploration and work readiness training.</p>	
<p>Goal 2, Objective 1: Increase participation of students (14-21) with disabilities engaged in high quality Pre-ETS</p>	
<p>Strategies</p>	<p>Progress</p>
<p>2.1.1 Continue to build relationships with statewide and local education entities to increase awareness and understanding of Pre-ETS services and how they benefit schools and students with disabilities.</p>	<p>Pre-ETS team engaged with the Capacity Building Institute (CBI) and participated in training applicable to students with disabilities, including students with 504 plans.</p> <p>Pre-ETS Bureau Chief developed transition materials with Office of Public Instruction that included information for schools on 504.</p> <p>On an individual and ongoing basis, Pre-ETS Specialists meet with schools and remind them to include students with 504s in Pre-ETS activities and training.</p> <p>Pre-ETS team actively engaged with Work-Based Learning Collaborative (WBLC). Pre-ETS staff have participated in annual retreats and utilize the relationships built to</p>

	<p>connect with different programs and provide cross-training on services.</p> <p>In 2024, Pre-ETS team piloted the Transitions Readiness Toolkit (TR) pre- and post- surveys with various schools across Montana and eventually added the TRT as a requirement to the Pre-ETS contracts with the schools. By 2025, the TRT has been added as a requirement to all Pre-ETS contracts. Pre-ETS Bureau Chief and Data Unit are actively working on a plan to manage, analyze, and share the data collected.</p> <p>Intentional engagement with Montana School for the Deaf and Blind has been ongoing to ensure that sufficient orientation and mobility (O&M) services are being provided to students and that VR is providing support that does not supplant services.</p> <p>In October 2024, VR launched Disability Mentoring Week to celebrate Disability Employment Awareness Month. Over 100 students signed up to participate across Montana. Students were able to job shadow, participate in worksite tours and have business professionals come into their classrooms. VR Director presented on the Montana Disability Mentoring Week activity at the Monthly Council of State Administrators of VR (CSAVR) meeting.</p> <p>In October 2025, VR facilitated the second annual Disability Mentoring Week. 117 students signed up to participate in work experiences and job shadows across the state. The 2025 event included zoom calls where individuals working in several different occupations presented to students who had the opportunity to ask questions.</p>
<p>2.1.2 Develop tools to share information with youth, families, educators, and service providers about available services.</p>	<p>Hired a Training and Public Relations Specialist.</p> <p>Pre-ETS team with Training and Public Relations Specialist, developed new and improved Pre-ETS rack cards and have started working on overhauling the Pre-ETS website.</p> <p>Pre-ETS Bureau Chief and Capacity Building Institute implemented a project to overhaul the Montana Youth Transitions website to be more comprehensive. The updated website has been modernized and provides</p>

	<p>access to resources for students, parents, teachers, and professionals.</p> <p>Pre-ETS team, in partnership with CBI, Montana’s Department of Labor and Industry (DLI), and the Rural Institute for Inclusive Communities, developed transition guides and shared them broadly across stakeholders.</p>
2.1.3 Explore additional community agencies to provide Pre-ETS services.	<p>Targeted, intentional outreach to collaborate with other programs serving youth in Montana has been completed by the Pre-ETS team. Local Boys and Girls Clubs have been targeted as well as Reach Higher Montana. Current community outreach for Pre-ETS is focused on Big Brothers, Big Sisters.</p>
Goal 2, Objective 2: Increase participation for youth in foster system.	
Strategies	Progress
2.2.1 Enhance the approach to capturing and analyzing data to better identify and serve foster youth.	<p>VR’s Data Unit and the Pre-ETS Bureau Chief developed and implemented an enhanced, two-pronged process to achieve this goal. First, the Pre-ETS Bureau Chief collected data from CHAFEE, Montana’s Foster Care Independence Program, and provided it to the Data Unit. The Data Unit matches the CHAFEE data with enrollments in Pre-ETS or VR and provides the matched data back to the Pre-ETS Bureau Chief. Second, the VR Data Unit added a field to the Pre-ETS Student Request Form to capture foster care affiliated youth and an associated report in the VR case management system was developed to view the data cohesively.</p>
2.2.2 Engage with partners in the foster care network to identify and engage youth who could benefit from VR.	<p>A goal was established with the Governor’s office to achieve a 50% increase in the number of foster youths aged 14 and older participating in VR and/or Pre-ETS. This goal was achieved twice over with a 109% increase in number of foster youth served (baseline served: 33: total served at time of goal completion: 69).</p> <p>Pre-ETS team completed the following outreach activities:</p> <ul style="list-style-type: none"> • Presented to Behavioral Health Alliance of Montana and were invited back to follow-up with the group in person

	<ul style="list-style-type: none"> • VR/Pre-ETS, WIOA Youth, Reach Higher, CHAFEE, Youth Demonstration Project, OPI presented information to foster care providers • WIOA Youth Connections Presentation • Added Pre-ETS connection into recently updated “older youth” procedure for Child Protective Services. • Shared Pre-ETS info with resource families in newsletter • Provided info about the goal and the benefits of Pre-ETS for the Child and Family Services Division (CFSD) newsletter • Shared info on Summer Camps for VR and Pre-ETS youth with Foster Care families, CHAFEE providers and CFSD. • Pre-ETS Specialists attended monthly meetings with CHAFEE providers where everyone broke into groups based on areas served and asked groups to explore and share ideas about how they can/will work together locally • Met with Youth Homes staff, AWARE, Confederated Salish and Kootenai Tribes (CSKT) program, WEX opportunities for students who work on the Youth Homes Farm, etc. • Billings Pre-ETS Specialist scheduled to teach a Life Skills Class at Tumbleweed, a CHAFEE provider
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<p>Goal 3: Coordination - Montana’s workforce system is coordinated to effectively support people with disabilities and their employers.</p>	
<p>Goal 3, Objective 1: Increase coordination with partner organizations</p>	
<p>Strategies</p>	<p>Progress</p>
<p>3.1.1 Develop and implement an approach to sharing resources and work with partners doing related work with shared clients in smaller/rural communities.</p>	<p>VR Director has been included in the State of Montana Rural Health Transformation Program which aims to stabilize and modernize rural health care delivery throughout Montana.</p> <p>VR Leadership intends to revitalize partnerships with tribal communities through Memoranda of Understanding with each tribal program that outline referral procedures, service coordination, data sharing, and joint planning is critical to</p>

	ensuring seamless collaboration, limiting duplication, and maximizing resources for shared customers in 2026.
3.1.2 Analyze options to develop a coordinated, streamlined WIOA referral process.	WIOA partners implemented use of a single release of information (ROI) that has all WIOA partners listed on the ROI to ensure communication and accurate reporting are taking place.
3.1.3 Hold regular collaboration meetings with partners, including a focus on partner and VR services and trainings.	WIOA workforce partners meet quarterly to collaborate on joint efforts, dual enrollment, and federal reporting.
3.1.4 Continue to engage with Job Service Employers' Committees (JSEC) and Community Management Teams (CMTs) local committees.	<p>VR leadership have joined Chamber of Commerce groups in their local areas including Havre, Miles City, Kalispell, Great Falls, Helena, and Billings.</p> <p>Business Services Specialists are actively engaged members of Society for Human Resource Management (SHRM).</p> <p>VR staff in the 9 field offices have one or more staff attending and participating in Community Management Team (CMT) and Job Service Employer Committee (JSEC) meetings locally.</p>
Goal 3, Objective 2: Enhance coordination with businesses/employers.	
Strategies	Progress
3.2.1 Provide increased training to employers to understand the benefits of hiring people with disabilities.	<p>Business Services Specialists participated in statewide Assistance for Business Clinics (ABCs) and provided presentations on VR's Business Services.</p> <p>Business Services Specialist participates in Jobs Jamboree, Eastern Montana's largest job fair, in Billings annually.</p> <p>Business Services Specialists regularly seek out job fairs and attend as many as their schedule allows to connect with employers across the state.</p> <p>Business Services Specialists are prioritizing relationships with Great Falls College in Great Falls, City College in Billings,</p>

	<p>Gallatin College in Bozeman and Salish Kootenai College in Pablo. In Great Falls, a partnership for Customized Training in welding has been developed and Customized Training opportunities are ongoing.</p> <p>The Third Annual Disability Employment Summit was put on by Business Services Team in May 2025 in Missoula, MT.</p> <p>The Fourth Annual Disability Employment Summit is currently being planned for May 2026. The Harkin Institute will be heavily involved in this Summit.</p> <p>VR Leadership traveled around the state during the fall of 2025 facilitating Disability Employment meets Industry events in and around the 9 local field offices where VR leadership and local office staff toured facilities of major employers in their areas to learn about their businesses and needs.</p> <p>Business Service Specialist is scheduled to present to all VR staff on the topic of Customized Training, including the importance and benefits to participants.</p>
<p>3.2.2 Continue to manage collecting employer data in the Madison data system.</p>	<p>VR Data Unit developed a form in the case management system to track and report business services being provided across the state.</p> <p>In March 2025, the form was updated and simplified.</p> <p>In December 2025, analysis of form usage indicates the form is being used inconsistently across the Business Services team. Investigation into form usage inconsistency is currently ongoing.</p>
<p>3.2.3 Identify a solution for the VR counseling staff to follow through with business connections made through the business services team</p>	<p>Business Services Specialists rotate through the 9 local field office staff meetings to discuss how to best integrate Business Services into the day-to-day work of the VR counselors.</p> <p>Business Services Specialists are developing a tool for VR counselors that will assist them in exploring industry-driven opportunities in their areas during counseling & guidance with participants.</p>

<p>Goal 4: Organizational Sustainability - VR is a stable, sustainable organization.</p>
<p>Goal 4, Objective 1: Increase staff recruitment, retention, and professional development</p>

Strategies	Progress
<p>4.1.1 Improve the onboarding and orientation process to integrate new hires into our organizational culture and provide support.</p>	<p>A quarterly cycle of Foundations, a MT VR-created counselor onboarding curriculum, was implemented mid-2024. The training takes place in-person for newly hired VR staff and staff who would like a refresher on the content. This training moves locations across the state depending on need.</p> <p>In November 2025 VR executed a contract for the online learning platform, YesLMS that houses VR counselor trainings, and replaces VR 101 modules previously used to support counseling staff onboarding.</p> <p>Training & Public Relations Specialist developed a training guide for supervisors and counselors to assist both in completing training on all required topics in the first 6 weeks of employment.</p>
<p>4.1.2 Refine training for adult learners and create tools and trainings in different modalities to increase understanding and integration.</p>	<p>In May 2025, University of Wisconsin – Stout provided training to all MT VR leadership on adult learning styles and ways to develop and facilitate trainings for an adult audience.</p> <p>Techniques learned in the aforementioned training have been implemented into trainings created by MT VR leadership.</p> <p>Additional training on adult learning has been made available through LinkedIn Learning (the State employee’s online learning platform).</p>
<p>4.1.3 Define the training and support needs for VR support staff and implement improvements.</p>	<p>Initial plans to hire support staff “lead” positions in the Billings and Missoula VR offices that could assist with training and support for statewide VR support staff did not prove successful.</p> <p>MT VR leadership re-strategized to add training and support for statewide VR support staff duties to the Central Office support staff position. Informally, these duties are referred to as “Madison Super User” duties. January 2026, the Central Office support staff position was filled and “Madison Super User” duties will be disseminated over time.</p> <p>A small group of long-time support staff began meeting in 2025 to develop and compose official support staff</p>

	<p>procedures. Completion of the official procedures are scheduled for 2026.</p>
<p>4.1.4 Continue to integrate the VR culture into everything we do. Talk with staff about our mission, vision, and values, and how this relates back to the individuals VR serves.</p>	<p>VR Mission is read at the beginning of every internal meeting, is included on all meeting agendas, and is posted in all 9 VR field offices.</p> <p>VR has established an annual Business Summit that focuses on the dual customer to VR.</p> <p>VR established Disability Mentoring week in 2024 and completed the 2nd annual event in 2025. The 3rd annual event is currently being planned for October 2026.</p> <p>VR recruited a small sub-set of MT CRPs to participate in a rate re-structuring group that involved re-training on WIOA performance measures and values-based purchasing resulting in deeper understanding of VR mission and expectations of partners.</p> <p>“Mission Moments” was implemented into the beginning of VR Leadership meeting. This is an opportunity for all to share experiences that demonstrate the VR mission in action that have occurred since the previous meeting.</p>
<p>Strategies</p>	<p>Progress</p>
<p>4.2.1 Explore options to increase to CRP capacity through establishment authority.</p>	<p>MT VR explored establishment grants and chose not to pursue establishment further at this time.</p> <p>MT VR implemented an in-house, ACRE-certified Customized Employment training for providers. The initial round of training was completed spring 2025 and resulted in 2 newly trained providers.</p> <p>MT VR posted an RFP to hire a single vendor to offer statewide business plan writing and self-employment technical assistance to VR clients pursuing self-employment. The RFP was posted twice, neither time resulting in an award. Leadership are pursuing a direct hire as directed by DPHHS Office of Procurement and Contracts.</p>

<p>4.2.2 Continue to explore developing a self-direction services option to increase capacity of CRPs.</p>	<p>No progress update.</p>
<p>Strategies</p>	<p>Progress</p>
<p>4.3.1 Continue to improve Madison’s functionality by looking for and implementing efficiencies and providing training on new work processes.</p>	<p>Many improvements to the VR case management system have been implemented including:</p> <ul style="list-style-type: none"> • Search by purchase order number • Data Unit able to add forms to exited cases • Provider “short name” viewable • Counseling & Guidance and Information & Referral service categories pre-populate on all IPEs • Pre-ETS Services pre-populate on all Pre-ETS IPEs • Improved efficiency of the Order of Selection (OOS) process in for newly implemented OOS in 2025 • Improved payment process by reworking Ticklers in system • CRPs billing/invoicing through the system
<p>4.3.2 Include CRP invoicing in Madison.</p>	<p>CRPs were trained on Madison in November 2025 and Go Live for CRPs to begin invoicing through Madison was December 2025. The transition was mostly smooth and while there are issues to be resolved from time to time, this has been successfully completed.</p>
<p>4.3.3 Explore artificial intelligence interfaces with Madison.</p>	<p>MT VR explored AI options for interface with the current case management system and chose not to pursue further at this time.</p> <p>Staff are using AI (Copilot specifically approved by the State) to refine their writing or dictation, including case note summaries, and often cut-and-pasting into Madison.</p>
<p>Strategies</p>	<p>Progress</p>
<p>4.4.1 Focus on achieving excellence on the WIOA performance measures.</p>	<p>Training for staff on the 6 Common Performance Measures is ongoing in the following ways:</p> <ul style="list-style-type: none"> • Operations Bureau Chief presents annually to the SRC and CRPs on 6 Common Performance Measures • 911 dashboards are reviewed with Leadership Team quarterly

	<ul style="list-style-type: none"> • 6 Common Performance Measures are a standing agenda item for the annual VR All Staff meeting • Supervisors share 911 dashboards quarterly at their local office staff meetings <p>Foundations training has been updated to include introductory training on 6 Common Performance measures.</p> <p>In Program Year 2024 (ending June 2025) Montana achieved or exceeded three out of its five WIOA performance measures:</p> <ul style="list-style-type: none"> • Employment (Second Quarter After Exit) • Employment (Fourth Quarter After Exit) • Median Earnings (Second Quarter After Exit)
<p>4.4.2 Continue to enhance internal controls for financial monitoring.</p>	<p>Internal controls were developed and implemented to more tightly monitor Central Office support staff purchasing and fiscal tasks assigned to those positions by the Program Operations Bureau Chief.</p> <p>Internal controls were developed and implemented regarding Pre-ETS 15% Set-Aside.</p> <p>A new budget analyst was hired in April 2025 within VR, allowing the fully staffed DETD fiscal unit to more effectively carry out the internal controls it has established.</p>

2. PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR, REFLECTING ACTUAL AND NEGOTIATED LEVELS OF PERFORMANCE. EXPLAIN ANY DISCREPANCIES IN THE ACTUAL AND NEGOTIATED LEVELS; AND

Performance Indicator PY2024	Negotiated Level PY2024	Actual Level PY2024	Explanation for Discrepancies
Employment (second Quarter After Exit)	55.2%	56.1%	Montana's concentrated efforts have paid off in the areas of 1) ensuring the post-exit data remains accurate and 2) focusing on high-quality and lasting employment

			outcomes when exiting our participants
Employment (Fourth Quarter After Exit)	45.5%	57.9%	Montana's concentrated efforts have paid off in the areas of 1) ensuring the post-exit data remains accurate and 2) focusing on high-quality and lasting employment outcomes when exiting our participants
Median Earning (Second Quarter After Exit)	\$3550	\$5301	Montana's focus on high-quality employment outcomes is reflected in this level being exceeded.
Credential Attainment Rate	30%	28.8%	VR' sees this as an area to improve upon in both the data collection in our case management system and in our practices in the next program years.
Measurable Skill Gains	56.3%	54.9%	VR fell 1.4 points short of this goal, which was ambitious and does exceed the national average achieved rate of 53.2%, but is a continued area of focus.
Effectiveness in Serving Employers	Not applicable	Not applicable	

3. THE USE OF FUNDS RESERVED FOR INNOVATION AND EXPANSION ACTIVITIES (SECTIONS 101(A)(18) AND 101(A)(23) OF THE REHABILITATION ACT) (E.G., SRC, SILC).

For the most recently completed program year, PY 2024 ending 6-30-25, a total of \$55,328, was spent from the funds reserved for innovation and expansion activities. Activities supported

specifically by innovation and expansion funds include the SRC's consumer satisfaction survey and meetings plus project costs for the State Rehabilitation Council (SRC) and the Statewide Independent Living Council.

E. SUPPORTED EMPLOYMENT SERVICES, DISTRIBUTION OF TITLE VI FUNDS, AND
ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED
EMPLOYMENT SERVICES.

1. ACCEPTANCE OF TITLE VI FUNDS:

(A) VR agency requests to receive title VI funds.

2. IF THE VR AGENCY HAS ELECTED TO RECEIVE TITLE VI FUNDS, SECTION 606(B)(3) OF THE
REHABILITATION ACT REQUIRES VR AGENCIES TO INCLUDE SPECIFIC GOALS AND PRIORITIES
WITH RESPECT TO THE DISTRIBUTION OF TITLE VI FUNDS RECEIVED UNDER SECTION 603 OF
THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.
DESCRIBE THE USE OF TITLE VI FUNDS AND HOW THEY WILL BE USED IN MEETING THE GOALS
AND PRIORITIES OF THE SUPPORTED EMPLOYMENT PROGRAM.

The goal of the state's supported employment program is to maintain a system whereby individuals, including youth, with the most significant disabilities are afforded the opportunity to participate in competitive integrated employment.

Supported employment services are provided on a statewide basis through the Title VI, Part B funds. Individuals eligible for supported employment are those individuals with the most significant disabilities for whom competitive integrated employment has not historically occurred, or for whom competitive integrated employment has been interrupted or intermittent as a result of a significant disability, and who, because of the nature and severity of their disabilities, has had supported employment identified as the appropriate employment service followed by long term supports after the VR case is closed. Fund allocation on a statewide basis ensures an equitable statewide service delivery.

Montana VRBS projects that 180 individuals with the most significant disabilities will receive supported employment services in FFY26. To support these services, the agency anticipates utilizing approximately \$650,000 in combined Title I and Title VI funds, with \$316,000 allocated from Title VI and \$334,000 from Title I.

Vocational Rehabilitation (VR) 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, 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 VR services. If in the future VR determines that there are inadequate funds to provide all needed supported employment services for individuals on the VR caseload then supported employment will be funded with Title I dollars.

In addition, VR prioritizes the use of supported employment models that maximize integration of persons with the most significant disabilities in real work sites, doing meaningful work. Most

recently, VR has created a fee schedule, procedures, processes, and specialized contracts offered to Montana mental health centers to provide evidence based IPS services to individuals involved in their mental health treatment teams who are also VR participants. Title VI funds will be used to purchase IPS services for these individuals.

VR has implemented a new, in-house Customized Employment training system. This system is based on the system implemented by the State of Minnesota, who trained Montana and assisted Montana with ACRE certification. VR continues to issue CE-specific contracts to providers in Montana who have employees that have participated in Montana's newly developed in-house, ACRE-certified Customized Employment and providers with Discovery and/or Customized Job Development certifications from Marc Gold & Associates. Title VI funds may be used to purchase Customized Employment services for VR participants if it is determined that the client meets supported employment eligibility criteria and long-term supports will be needed despite the customized job created for the client.

VR does not support the use of segregated bench work, sheltered, enclave or segregated crew models.

3. SUPPORTED EMPLOYMENT SERVICES MAY BE PROVIDED WITH TITLE 1 OR TITLE VI FUNDS FOLLOWING PLACEMENT OF INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES IN EMPLOYMENT. IN ACCORDANCE WITH SECTION 101(A)(22) AND SECTION 606(B)(3) OF THE REHABILITATION ACT, DESCRIBE THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES; AND THE TIMING OF TRANSITION TO EXTENDED SERVICES.

VR most commonly enrolls supported employment providers who:

- are Developmental Disabilities Program (DDP) supported employment providers,
- have staff with Discovery and/or Customized Job Development certifications through Marc Gold & Associates, or
- are Community Mental Health Centers (CMHC)s,

Providers who do not fall into the aforementioned categories are individuals or organizations who have been enrolled to provide services for a limited number of participants in rural areas where there are no other established providers.

VR participants eligible to receive Title VI Part B funded supported employment services are those individuals with the most significant disabilities:

1. for whom competitive integrated employment has not historically occurred, or
2. for whom competitive integrated employment has been interrupted or intermittent as a result of a significant disability, and

3. who, because of the nature and severity of their disabilities, has had supported employment identified as the appropriate employment service followed by long term supports after the VR case is closed.

Once it is determined that a participant meets supported employment eligibility criteria, Supported Employment Services (SES) are listed in the participants Individualized Plan for Employment (IPE) and Data Element 49 "Supported Employment Goal on Current IPE" is marked as "1=Individual has a supported employment goal on the current IPE". If the participant is also a youth (age 24 and under), Extended Services is also listed on the IPE. Once the participant has gained employment, VRBS begins using Title IV Part B funds for the client's SES.

Quality of services is continually monitored by the VRBS counselors through regular meetings with employment specialists serving clients and monthly review of provider case notes. Additionally, VRBS counselor supervisors meet quarterly to monthly with providers in their areas to discuss service provision and address issues as needed. The Program Manager conducts regular reviews of the providers' supported employment services.

Extended Services are available through VRBS for youth, age 24 or under for up to 48 month and for all other exiting participants are available through the Developmental Disabilities Program (DDP), the Extended Employment Program (EE), other Medicaid-funded waivers (ex. Severe Disabling Mental Illness [SDMI] waiver), and private pay for individuals exiting VRBS. VRBS may also fund Extended Services for youth, age 24 or under for up to 48 months. The vast majority of supported employment participants utilize DDP or EE for Extended Services.

When a VR participant receiving Title IV Part B or Title 1 funded supported employment has access to Medicaid-funded waiver services through DDP, the Vocational Rehabilitation Counselor (VRC) obtains a signed cooperative agreement form from DDP indicating DDP agrees to fund the long-term supported employment. The VRC also coordinates with DDP to ensure DDP has all needed information and processes completed to take on funding the supported employment and a transition date is mutually agreed upon. The transition date is communicated to the supported employment provider. Once an individual transitions to DDP funded supported employment, the VRBS case remains open for a minimum of 90days to ensure seamless transition before the VRBS case is exited.

When a VRBS participant receiving Title IV Part B or Title 1 funded supported employment does not have access to a Medicaid waiver to fund their supported employment, they transition to EE. The VRC obtains a signed cooperative agreement from the EE Program Manager indicating EE agrees to fund the long-term supported employment and the EE Program Manager provides a transition date to the VRC and supported employment provider. Once an individual transitions to EE, the VRBS case remains open for a minimum of 90days to ensure seamless transition before the VRBS case is exited.

VRBS may provide supported employment services using Title VI Part B funds for a period not to exceed 24 months (for over-24 years old) or 48 months (for youth 16-25th birthday). The "time clock" starts ticking when the individual is hired and stops when the client is no longer employed, or when the VRBS case is exited. The time clock re-sets at zero should the client be hired at a

different employer. Should an individual re-open a new VRBS case, the time clock again starts at zero.

VRBS staff are expected to keep a tally of how many months have been used in each of their cases and notate this in their case documentation. The length of time that VRBS funds this service before moving to another funding source depends on several factors*:

1. Whether the individual has a long-term funding source immediately available (for example, Extended Employment (EE), Developmental Disabilities Program (DD) or Severe Disabling Mental Illness (SDMI) Wavier,
2. The amount and availability of Title VI Part B and Title 1 funds the VRBS program has designated for supported employment,
3. The age of the individual, and
4. How many months of the "time clock" the individual has already used.

*VRBS does not limit or delay the start of any service to any individual based on the above criteria.

After VRBS is no longer funding the individual's supported employment services (coded as SES in the IPE), the individual then transitions into the Extended Services needed for job maintenance. The Extended Services that VRBS funds for youth continue to count towards the individuals' accumulated months on the "time clock" and cannot exceed 48 months or the individual's 25th birthday, whichever occurs first.

Exceptions: In rare instances, the individual may exceed the 24 and 48-month provision if the VR counselor and the individual have determined that such services are needed to support and maintain the individual in SE. Should SE take longer than 24/48 months, it must be approved by the Counselor Supervisor and SE Program Manager, documented on the Individualized Plan for Employment (IPE) and in a case documentation note.

4. SECTIONS 101(A)(22) AND 606(B)(4) OF THE REHABILITATION ACT REQUIRE THE VR AGENCY TO DESCRIBE EFFORTS TO IDENTIFY AND ARRANGE, INCLUDING ENTERING INTO COOPERATIVE AGREEMENTS, WITH OTHER STATE AGENCIES AND OTHER APPROPRIATE ENTITIES IN ORDER TO PROVIDE SUPPORTED EMPLOYMENT SERVICES. THE DESCRIPTION MUST INCLUDE EXTENDED SERVICES, AS APPLICABLE, TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THE PROVISION OF EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES IN ACCORDANCE WITH 34 C.F.R. § 363.4(A) AND 34 C.F.R. § 361.5(C)(19)(V).

As mentioned above, when the appropriate funder for the participant's extended services has been identified, the VRBS Counselor is responsible for getting a cooperative agreement signed by the funder and the provider of the extended services. The cooperative agreement states:

"As funded by the source noted below, the undersigned service provider agrees to provide ongoing and other support services needed to maintain the designated individual's competitive integrated employment. Services will:

1. Be based on the needs of the individual as specified in the Individualized Plan for Employment (IPE) and
2. Include, at a minimum, twice-monthly monitoring of the individual to assess employment stability.”

A copy of the signed cooperative agreement is provided to the supported employment provider, the extended services funder, and the VRBS counselor for inclusion in the case file.

See sections I(5), I(6), and I(7) for cooperative agreements between VRBS, Medicaid, and mental health as well as between VRBS and DDP that are in effect or in draft respectively.

F. ANNUAL ESTIMATES

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 C.F.R. § 361.29(b), annual estimates must include the following projections:

1. ESTIMATES FOR NEXT FEDERAL FISCAL YEAR—

A. VR PROGRAM; AND

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Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Priority Category (if applicable)				No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
<u>Priority Category 1</u>	2377	1727	\$ 3,665,830				650
<u>Priority Category 2</u>	2450	1770	\$ 4,114,943				680
<u>Priority Category 3</u>	518	370	\$ 778,956				148

B. SUPPORTED EMPLOYMENT PROGRAM.

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Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
Priority Category 1	195	180	\$650,000 (\$316,000 from Title VI and \$334,000 from Title I)	15
Priority Category 2	Not Served with Supported Employment	Not Served with Supported Employment	Not Served with Supported Employment	n/a
Priority Category 3	Not Served with Supported Employment	Not Served with Supported Employment	Not Served with Supported Employment	n/a

G. ORDER OF SELECTION

1. PURSUANT TO SECTION 101(A)(5) OF THE REHABILITATION ACT, THIS DESCRIPTION MUST BE AMENDED WHEN THE VR AGENCY DETERMINES, BASED ON THE ANNUAL ESTIMATES DESCRIBED IN DESCRIPTION (F), THAT VR SERVICES CANNOT BE PROVIDED TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR AND ARE DETERMINED ELIGIBLE FOR SERVICES.

* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection. The VR agency is implementing an order of selection.

Montana VR has determined that VR services cannot be provided to all eligible individuals with disabilities in the state who apply for and are determined eligible for services and is therefore implementing the closure of all categories under the state’s current OOS, as of June 1, 2026.

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—

A. THE JUSTIFICATION FOR THE ORDER

Montana VR’s fiscal projections, shown below, indicate that the agency will be unable to serve all eligible individuals with resources currently available, despite the cost containment measures described below, including the closure of priority categories 2 and 3 which was implemented on July 28, 2025.

Category	FFY26	FFY27
Cost Per Case including Staff salaries, admin, etc.	\$6532	\$6875
VR Participants (Estimated with Priority 1 Open and Priority 2 and 3 Closed)	3715	3854
Total Expenses	\$ 24,266,380	\$ 26,496,250
	FFY26	FFY27
Federal Award Predicted (does not include CPIU and not carryforward)	\$13,848,074	\$13,848,074
Match	\$3,747,954	\$3,747,954
Ticket to Work Projected Income	\$888,341	\$888,341

Total Revenue	\$18,484,369	\$18,484,369
	FFY26	FFY27
Total Expenses	\$ 24,266,380	\$ 26,496,250
Total Revenue	\$18,484,369	\$18,484,369
Revenue Surplus/Deficit	(\$5,782,011)	(\$8,011,881)

Cost Containment Measures taken include:

- 6% vacancy savings imposed
- Overtime no longer allowed
- All staff events transitioned from in-person to virtual
- Analysis of comparable benefits usage completed
- Staff will utilize Job Service, One-Stop centers more for Job Placement activities
- Community Resource lists have been updated
- Requests for Proposals pulled back
- Contracts that were in progress have been pulled back
- Every agency purchase not included in an IPE is reviewed and approved daily by the Disability Employment and Transition Administrator. This includes office supplies, employee travel, etc.
- All high-risk purchases require Bureau Chief approval. Examples include: graduate-level training, out-of-state training, private school training, purchases of goods exceeding \$3000, and client reimbursements.

B. THE ORDER (PRIORITY CATEGORIES) TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES ENSURING THAT INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

The order (priority categories) to be followed in selecting eligible individuals to be provided VR services ensures that individuals with the most significant disabilities are selected for services before all other individuals with disabilities. Eligible individuals are placed into one of the following priority categories:

Priority Category 1: An individual with the most significant disability as defined below.

Priority Category 2: An individual with a significant disability as defined below.

Priority Category 3: An individual with a disability as defined below.

Definitions:

Priority Category 1, Most Significantly Disabled (MSD): Eligible individual(s) with a most significant disability that results in serious functional limitations in three or more functional capacities, and who will require multiple services.

Priority Category 2, Significantly Disabled (SD): Eligible individual(s) with a significant disability that results in serious functional limitations in one or more functional capacities, and who will require multiple services.

OR

The individual is a recipient of Social Security Disability Benefits (SSDI) or Supplemental Security Income (SSI) as a result of disability who is presumed to be eligible for VR services and an individual with a significant disability.

Priority Category 3, Not Significantly Disabled (NSD): All other eligible Individuals with disabilities.

VR serves eligible individuals with the most significant disabilities (Priority Category 1) first. Eligible individuals with significant disabilities (Priority Category 2) are served next after Priority Category 1 is open and no individuals are on the waitlist, followed by eligible individuals with disabilities (Priority Category 3) after Priority Category 2 is open and no individuals are on the waitlist. Regardless of which category closure scenario is in effect, eligible individuals will be released from the statewide waiting list first by priority category, most significant to least significant; and then by order of application date, oldest to newest.

C. THE VR AGENCY'S GOALS FOR SERVING INDIVIDUALS IN EACH PRIORITY CATEGORY, INCLUDING HOW THE AGENCY WILL ASSIST ELIGIBLE INDIVIDUALS ASSIGNED TO CLOSED PRIORITY CATEGORIES WITH INFORMATION AND REFERRAL, THE METHOD IN WHICH THE VR AGENCY WILL MANAGE WAITING LISTS, AND THE PROJECTED TIMELINES FOR OPENING PRIORITY CATEGORIES. NOTE: PRIORITY CATEGORIES ARE CONSIDERED OPEN WHEN ALL INDIVIDUALS IN THE PRIORITY CATEGORY MAY BE SERVED.

VR will continue to provide services to individuals currently receiving services in an IPE as of the effective OOS implementation date until resources become available and the priority category is opened.

When OOS is in effect, counselors will continue to take applications and make eligibility determinations. VR will provide all eligible individuals who are put on the OOS waiting list with information about, and referral to, other federal or state programs (including components of the statewide workforce investment system) that can assist them in preparing for, securing, retaining or regaining employment.

VR will notify each individual determined eligible, in writing of:

(A) The priority categories,

(B) The individual's assignment to a particular priority category classification,

(C) Any reclassification of priority category assignment due to changes in the individual's circumstances, or due to any misclassifications,

- (D) The individual's right to appeal the category assignment; and
- (E) The availability of assistance from the Client Assistance Program.

Individuals on the OOS waiting list will be contacted at least once in the first 180 days after being placed on the waiting list, and every 180 days thereafter.

The order of selection shall in no way affect the provision of pre-employment transition services to students with disabilities who were receiving such services prior to being determined eligible for VR and were placed in a closed category.

The method in which Montana VR will manage the waiting list will be by serving eligible individuals with the most significant disabilities (Priority Category 1) first. Eligible individuals with significant disabilities (Priority Category 2) are served next after Priority Category 1 is open and no individuals are on the waitlist, followed by eligible individuals with disabilities (Priority Category 3) after Priority Category 2 is open and no individuals are on the waitlist. Regardless of which category closure scenario is in effect, eligible individuals will be released from the statewide waiting list first by priority category, most significant to least significant; and then by order of application date, oldest to newest.

Montana VR's projected timeline to open Priority Category 1 is 12-15-26; Priority Category 2 is 4-1-27 months and Priority Category 3 is 12-31-27.

3. HAS THE VR AGENCY ELECTED TO SERVE ELIGIBLE INDIVIDUALS OUTSIDE OF THE ORDER OF SELECTION WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT?

VR has elected not to implement a policy regarding the provision of specific services or equipment for eligible individuals to maintain employment.

H. WAIVER OF STATEWIDENESS.

The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with Section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 C.F.R. § 361.26. If the VR agency is requesting a waiver of state wideness or has a previously approved waiver of state wideness, describe the types of services and the local entities providing such services under the waiver of state wideness and how the agency has complied with the requirements in 34 C.F.R. § 361.26. If the VR agency is not requesting or does not have an approved waiver of state wideness, please indicate "not applicable."

Not Applicable

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT.

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the State VR agency will undertake to

ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

1. ANALYSIS OF CURRENT PERSONNEL AND PROJECTED PERSONNEL NEEDS INCLUDING—

A. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

B. THE NUMBER AND TYPE OF PERSONNEL THAT ARE EMPLOYED BY THE VR AGENCY IN THE PROVISION OF VOCATIONAL REHABILITATION SERVICES, INCLUDING RATIOS OF QUALIFIED VOCATIONAL REHABILITATION COUNSELORS TO CLIENTS;

C. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES IN 5 YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Division Administrator	1	1	1
Deputy Administrator	1	1	1
Bureau Chiefs (Program Support, Field Services, Pre-ETS, & Blind and Low Vision)	3	4	4
Program Managers (Independent Living, Deaf, Social Security, Transportation, Business Services)	6	6	6
Central Office Admin Support Staff	.75	1.75	1.75
Counseling Staff (counselors and Counselor Supervisors for both General and BLVS programs)	40	44	50

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Pre-ETS Specialists	8	8	9
Rehabilitation Technicians	8	8	8
Orientation and Mobility Specialists	3	4	4
Vision Rehabilitation Therapists	5	5	5
Field Administrative Support	19	20	20
Technical Support (Budget Analyst, Business Analyst, Technology Assistant, Contract Specialist)	6	6	6

D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

As of January 1, 2026 VR served a total of 4013 clients with 31 Counselors and 13 Counselor Supervisors across the agency. The average caseload per Counselor is 104 and the average per Counselor Supervisor is 57.

E. PROJECTED NUMBER OF INDIVIDUALS TO BE SERVED IN 5 YEARS:

The disability rate for individuals under the age of 65 for the state of Montana is 9.9%, according to the census.gov which is 112,586 individuals. Using a linear projection based on number of historical participants and assuming all priority categories are open, VR estimates serving 5,421 individuals in PY28.

2. DATA AND INFORMATION ON PERSONNEL PREPARATION AND DEVELOPMENT, RECRUITMENT AND RETENTION, AND STAFF DEVELOPMENT, INCLUDING THE FOLLOWING:

A. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM; THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
Western Michigan University	Vision Rehabilitation Therapy	3	0
Western Michigan University	Orientation and Mobility Specialist	0	1
Utah State University	Rehabilitation Counseling	1	1
St Cloud University	Rehabilitation Counseling	0	1
George Washington University	Rehabilitation Counseling	2	2
Montana State University Billings	Rehabilitation Counseling	4	1
University of Alabama	Rehabilitation Counseling	1	0
Virginia Commonwealth University	Rehabilitation Counseling	1	1
University of Wisconsin - Stout	Rehabilitation Counseling	2	0

B. THE VR AGENCY’S PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL, WHICH ADDRESSES THE CURRENT AND PROJECTED NEEDS FOR QUALIFIED PERSONNEL; AND THE COORDINATION AND FACILITATION OF EFFORTS BETWEEN THE VR AGENCY AND INSTITUTIONS OF HIGHER EDUCATION AND PROFESSIONAL ASSOCIATIONS TO RECRUIT, PREPARE, AND RETAIN PERSONNEL WHO ARE QUALIFIED, INCLUDING PERSONNEL FROM MINORITY BACKGROUNDS AND PERSONNEL WHO ARE INDIVIDUALS WITH DISABILITIES.

Montana VR works to recruit qualified personnel in a variety of ways including working closely with Montana State University-Billings, to share open positions with students of their rehabilitation counseling program. VR works with all colleges across the state in order to recruit individuals from minority backgrounds, including Montana’s tribal population and people with significant disabilities. Recruitment efforts also include posting positions to Handshake at universities

nationwide that offer rehabilitation counseling programs, posting positions to the RSA PIMS recruitment site and the CRCC recruitment site. Additionally, positions are posted to LinkedIn and also shared with networks including local partners to include Job Service, the State Rehabilitation Council and professional associations.

C. DESCRIPTION OF STAFF DEVELOPMENT POLICIES, PROCEDURES, AND ACTIVITIES THAT ENSURE ALL PERSONNEL EMPLOYED BY THE VR AGENCY RECEIVE APPROPRIATE AND ADEQUATE TRAINING AND CONTINUING EDUCATION FOR PROFESSIONALS AND PARAPROFESSIONALS:

I. PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

II. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO VR AGENCY PROFESSIONALS AND PARAPROFESSIONALS AND FOR PROVIDING TRAINING REGARDING THE AMENDMENTS TO THE REHABILITATION ACT MADE BY THE WORKFORCE INNOVATION AND OPPORTUNITY ACT.

Montana VR utilizes a Comprehensive System of Personnel Development (CSPD) to monitor and track staff development. This is maintained by the Deputy Administrator and is comprised of all staff who are working toward a master's degree in rehabilitation counseling, vision rehabilitation therapy and orientation and mobility. The CSPD tracking spreadsheet includes information for all personnel in the following respective CSPD statuses: 1) those who hold a master's degree and CRC or other certification, 2) those who are in training assignments and working toward a master's degree and certification, 3) those who have been newly hired and are preparing for graduate studies.

The Deputy Administrator tracks CSPD progress through this spreadsheet and updates when a new staff member is hired, signs a CSPD agreement, enters graduate school, earns a master's degree, and obtains a credential (e.g., CRC). This information is regularly shared with the program administrator to assist in staffing decisions.

Additionally, all staff participate ongoing staff development and training. All new employees undergo VR Foundations Training to establish an understanding of the values that inform the mission of our profession and best practices to promote efficiency and excellence in service of our consumers. VR also entered into a contract with YesLMS to provide continuing education and staff will have access to the extensive YesLMS library. Training staff will also have the ability to develop original content within this platform and plan to create custom learning modules catered to the training needs within the agency.

Additional staff training opportunities include access to continuing education through the VR-TACs and other training opportunities. VR staff have the opportunity to engage in professional development such as the Leaders program through UA Currents, courses through the Stout Vocational Rehabilitation Institute and the GWU Center for Center for Innovative Training. Leadership staff also engage in training and development through the National Rehabilitation Leadership Institute (NRLI). Yearly, VR also holds an All Staff providing training for professional and paraprofessional staff to remain up to date on policies, procedures and activities necessary to provide high quality services to Montanans with disabilities seeking competitive, integrated employment.

3. DESCRIPTION OF VR AGENCY POLICIES AND PROCEDURES FOR THE ESTABLISHMENT AND MAINTENANCE OF PERSONNEL STANDARDS CONSISTENT WITH SECTION 101(A)(7)(B) TO ENSURE THAT VR AGENCY PROFESSIONAL AND PARAPROFSSIONAL PERSONNEL ARE ADEQUATELY TRAINED AND PREPARED, INCLUDING—

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

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

Montana VR utilizes a Comprehensive System of Personnel Development (CSPD) to monitor and track staff development. This is maintained by the Deputy Administrator and is comprised of all staff who are working toward a master's degree in rehabilitation counseling, vision rehabilitation therapy and orientation and mobility. The CSPD tracking spreadsheet includes information for all personnel in the following respective CSPD statuses: 1) those who hold a master's degree and CRC or other certification, 2) those who are in training assignments and working toward a master's degree and certification, 3) those who have been newly hired and are preparing for graduate studies.

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Additionally, all staff participate ongoing staff development and training. All new employees undergo VR Foundations Training to establish an understanding of the values that inform the mission of our profession and best practices to promote efficiency and excellence in service of our consumers. VR also entered into a contract with YesLMS to provide continuing education and staff will have access to the extensive YesLMS library. Training staff will also have the ability to develop original content within this platform and plan to create custom learning modules catered to the training needs within the agency.

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The Certified Rehabilitation Counselor credential is preferred. VR incentivizes this credential by providing a pay raise to those who earn their CRC credential. Additionally, in order to ensure that staff are continuing to meet the standards of adequate training, VR provides financial assistance for continuing education to maintain certification and provides staff development opportunities both internally through ongoing training and externally promotes opportunities through partners including several vocational rehabilitation training institutes such as The Centre for Rehabilitation Counseling Research at George Washington University and UA Currents. VR also has strong relationships with several national technical assistance centers (VR-QMTAC and OIB TAC; Rural Institute on Disability) that produce training focused on best practices and emerging knowledge in the field.

VR ensures that standards for training opportunities align with certifying bodies credentialing bodies by maintaining a continuing education provider account with CRCC to provide continuing education credits to certified staff. VR applies for and has been granted continuing education credits for training and provides these continuing education credits to any qualified staff who attend. VR has also become a continuing education provider with ACVREP to provide continuing education opportunities internally to our Orientation and Mobility Specialists and Vision Rehabilitation Therapists. The Deputy Administrator also maintains a tracking system for all staff who are either working to obtain a degree or certification and follows up to ensure that staff are participating in continued education opportunities to maintain the necessary professional development to maintain those credentials.

4. METHOD(S) THE VR AGENCY USES TO ENSURE THAT PERSONNEL ARE ABLE TO COMMUNICATE IN APPROPRIATE MODES OF COMMUNICATION WITH OR IN THE NATIVE LANGUAGE OF APPLICANTS OR ELIGIBLE INDIVIDUALS WHO HAVE LIMITED ENGLISH SPEAKING ABILITY.

Montana VR utilizes several methods of communication to ensure that applicants or consumers are able to effectively communicate with staff. When a person speaks a language other than English, staff have access to Language Link interpretive services which allows for communication. VR also hires sign language interpreters to assist applicants and eligible individuals who are Deaf or Hard of Hearing to communicate and engage in the vocational rehabilitation process. VR also has dedicated staff who work specifically with these consumers. Applicants and eligible individuals are also able to communicate with staff through a variety of methods including meeting in person, email and text communication and phone calls and can access teletype communication. Alternate formats and

other accommodations are also routinely used by VR to ensure effective communication and staff consult with the consumer to determine their preferred method of communication.

5. AS APPROPRIATE, DESCRIBE THE PROCEDURES AND ACTIVITIES TO COORDINATE THE DESIGNATED STATE UNIT'S COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT WITH PERSONNEL DEVELOPMENT UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT.

VR is committed to coordinating the agency's comprehensive system of personnel development with the personnel development activities of the state education agency whenever possible. Training and education will be identified for staff regarding service provision, coordination and best practices in serving students with disabilities. Training opportunities offered by VR which are relevant to both educators and vocational rehabilitation professionals will be opened to school staff for participation when applicable.

A Pre-ETS Specialist is assigned to actively participate on the Montana Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This panel works to ensure that training needs are adequately identified and then addressed through shared training opportunities.

VR staff and OPI staff routinely give transition presentations at events such as the Montana Youth Transitions Conference. This event brings together students with disabilities, parents, public educators, VR staff and other programs. The Office of Public Instruction (OPI), VR and other agencies are currently planning joint transition panel presentations at the OPI Summer Institute and Montana Council for Exceptional Children Conference.

Montana VR and the Office of Public Instruction (OPI) coordinate the Designated State Unit's Comprehensive System of Personnel Development (CSPD) with personnel development under the Individuals with Disabilities Education Act (IDEA) through joint participation in the National Technical Assistance Center on Transition's (NTACT) Capacity Building Institute (CBI).

This collaboration ensures alignment between vocational rehabilitation and educational personnel development by focusing on shared objectives that strengthen transition services for youth with disabilities. Through the CBI, Montana VR and OPI work together to:

- Increase knowledge of effective secondary transition-focused practices among staff across both systems.
- Use relevant secondary transition data to evaluate and improve current practices.
- Update or develop interagency strategic plans that integrate CSPD and IDEA requirements.
- Foster youth engagement and leadership to inform personnel development priorities.
- Develop new and strengthen existing partnerships with other states and entities to share best practices and resources.

By engaging in these activities, Montana VR and OPI create a coordinated approach that supports professional development for personnel in both systems, ensuring consistency in service delivery and improved outcomes for students transitioning from school to employment.

J. COORDINATION WITH EDUCATION OFFICIALS.

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

1. DESCRIBE PLANS, POLICIES, AND PROCEDURES FOR COORDINATION BETWEEN THE DESIGNATED STATE AGENCY AND EDUCATION OFFICIALS RESPONSIBLE FOR THE PUBLIC EDUCATION OF STUDENTS WITH DISABILITIES, THAT ARE DESIGNED TO FACILITATE THE TRANSITION OF THE STUDENTS WITH DISABILITIES FROM THE RECEIPT OF EDUCATIONAL SERVICES IN SCHOOL TO THE RECEIPT OF VOCATIONAL REHABILITATION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES.

VR created a Pre-ETS Bureau in 2019 which included 7 Pre-ETS Specialists, 1 Data Technician and the Bureau Chief. In June of 2022, a Pre-ETS Specialist position was added for the Bozeman area, one of Montana's fastest growing communities. The Pre-ETS Specialists routinely meet with their assigned high schools sharing resources and working together to provide Pre-ETS to students with disabilities. There is also a VR Vocational Rehabilitation Counselor assigned to each high school in Montana to ensure a smooth transition into adult services.

Each year, VR reaches out to all accredited high schools in Montana to give them the opportunity to collaborate in providing Pre-ETS to students with disabilities. Every accredited high school has the opportunity to enter into a contract and receive funding from VR to provide Pre-ETS. School districts develop scope of work plans to describe how they will provide the five required components of Pre-ETS and receive funding quarterly based on the number of Pre-ETS services provided to students with disabilities who request the services. The school districts are required to provide VR with the documentation of Pre-ETS services they are providing to students with disabilities. VR offers this opportunity to all schools including those located in institutional settings, the juvenile justice system and the Department of Military Affairs.

A Pre-ETS Bureau staff member is assigned to actively participate on the Montana Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This Panel works to ensure that training needs are adequately identified and then addressed through shared training opportunities.

Montana partnered with several states, Penn State University, and Utah State University on a national grant to develop the Transition Readiness Toolkit (TRT). The TRT includes survey instruments designed to measure the impact of Pre-ETS services through pre- and post-surveys administered to students receiving these services. Schools and providers now use TRT surveys to ensure their Pre-ETS programs are making a measurable difference. Pre-ETS staff collaborate with schools and providers to analyze survey results and use the data to continuously improve program quality and outcomes for students.

Working through the National Technical Assistance Center on Transition: the Collaborative (NTACT:C) Montana has pulled together a Capacity Building Institute (CBI) interagency team to focus on strategic planning around transition. NTACT:C is a jointly funded RSA and OSEP technical assistance center focused on collaboration between special education and vocational rehabilitation and other stakeholders. Some of the CBI focus areas include student-focused planning, student development, family engagement, program structures and interagency collaboration. Working

together, this CBI team is developing panel presentations on transition for the Montana Council on Exceptional Children and the Office of Public Instruction Summer Institute.

2. DESCRIBE THE CURRENT STATUS AND SCOPE OF THE FORMAL INTERAGENCY AGREEMENT BETWEEN THE VR AGENCY AND THE STATE EDUCATIONAL AGENCY. CONSISTENT WITH THE REQUIREMENTS OF THE FORMAL INTERAGENCY AGREEMENT PURSUANT TO 34 C.F.R. § 361.22(B), PROVIDE, AT A MINIMUM, THE FOLLOWING INFORMATION ABOUT THE AGREEMENT:

A. CONSULTATION AND TECHNICAL ASSISTANCE, WHICH MAY BE PROVIDED USING ALTERNATIVE MEANS FOR MEETING PARTICIPATION (SUCH AS VIDEO CONFERENCES AND CONFERENCE CALLS), TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES AND OTHER VOCATIONAL REHABILITATION SERVICES;

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY PERSONNEL FOR STUDENTS WITH DISABILITIES THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS (IEPS) UNDER SECTION 614(D) OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT;

C. THE ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES;

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES. OUTREACH TO THESE STUDENTS SHOULD OCCUR AS EARLY AS POSSIBLE DURING THE TRANSITION PLANNING PROCESS AND MUST INCLUDE, AT A MINIMUM, A DESCRIPTION OF THE PURPOSE OF THE VOCATIONAL REHABILITATION PROGRAM, ELIGIBILITY REQUIREMENTS, APPLICATION PROCEDURES, AND SCOPE OF SERVICES THAT MAY BE PROVIDED TO ELIGIBLE INDIVIDUALS;

E. COORDINATION NECESSARY TO SATISFY DOCUMENTATION REQUIREMENTS SET FORTH IN 34 C.F.R. PART 397 REGARDING STUDENTS AND YOUTH WITH DISABILITIES WHO ARE SEEKING SUBMINIMUM WAGE EMPLOYMENT; AND

F. Assurance that, in accordance with 34 C.F.R. § 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 C.F.R. § 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage. The State Special Education Director position at the Office of Public Instruction (OPI) remained vacant for an extended period, which delayed updates to the formal interagency agreement with the state educational agency. After the position was filled, VR collaborated closely with the new Director and OPI staff to revise and finalize the Memorandum of Understanding (MOU).

The following is from the most recent MOU with OPI that details the technical assistance responsibilities of each agency.

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

In addition, VR 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 VR and students enrolled in the Montana University System (MUS). This MOU has provisions which include:

1. VR 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 VR 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 VR or MUS services.
2. The units of the MUS through the guidance of the OCHE are required to provide services and accommodations to VR' 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. VR is not prohibited in this agreement from contracting with units of the MUS to provide services or support for VR' 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 VR and the various campuses of the MUS.
5. VR 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 VR before providing services or support. For students who have applied for VR, the MUS will not deny or delay the provision of services or support while VR is in the process of determining eligibility for services.
7. VR 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 VR' 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.

The following is from the most recent MOU with OPI that details the transition planning responsibilities of each agency.

- VR and OPI agree to work collaboratively to facilitate and coordinate the smooth transition of students with disabilities from school to post-school activities, including the receipt of Pre-ETS, transition services, and other vocational rehabilitation services.
- Pursuant to 34 CFR 300.321(b)(3), to the extent appropriate, with consent of the parent or adult student, VR will be invited to participate in IEP development meetings for shared students with disabilities, depending on availability. VR may participate in person or through use of alternative means such as video conferencing or other methods. When VR is unable to attend the IEP meeting, LEA and VR will communicate regarding IEP goals and needed transition services after the IEP meeting.
- VR will provide assistance in transition planning for students with disabilities to facilitate the development and completion of their IEPs. VR will also provide information, technical assistance, case consultation, and information or referrals as needed for eligible or potentially eligible students.
- In conjunction with the IEP, which addresses transition, an Individualized Plan for Employment (IPE) will be developed for all individuals determined eligible by VR, which will document their vocational goal and the course of action designed to enable the student to achieve the stated goal, as well as timelines. The development of the IPE requires active participation from the student and may involve participation and support from the parent

and/or guardian. Participation from appropriate school personnel may also be encouraged in the development of this plan.

- The IPE must be developed prior to exit and within 90 days from the date of eligibility determination, agreed to, and signed by the student or the student's representative, and the VR counselor as early as possible in the transition process, but no later than the time the eligible student leaves the school setting. Section 101(a)(11)(D) of the Rehabilitation Act. The same applies for those able to be served if an Order of Selection is in effect. Section 101(a)(9)(A) of the Rehabilitation Act; 34 CFR 361.22(a).
- VR and LEAs will collaborate on the provision of ongoing joint staff training on topics such as the development and implementation of IEPs, Pre-ETS, accommodations under Section 504, and limitations on youth entering employment paying sub-minimum wage.
- VR and LEAs will collaborate to facilitate potential employers' local engagement in providing job shadows, paid and unpaid work-based learning opportunities, and other services for students with disabilities.
- VR, in collaboration with LEAs, will provide or arrange for the provision of Pre-ETS to all students with disabilities identified as requiring these services.

The following is from the most recent MOU with OPI that details the roles and responsibilities of each agency.

Joint Responsibilities of OPI and VR:

- OPI and VR shall jointly sponsor training for their respective staff members and LEA personnel. Training shall focus on existing and new State or Federal requirements or initiatives that impact the provision of services by both entities concerning education of individuals with disabilities, their transition from school to employment, vocational rehabilitation services, assistive technology, and the substance of this MOU.
- OPI and VR shall ensure that timely notice of training is provided to each other and to the LEAs as appropriate.
- OPI and VR shall each designate a single point of contact who will serve as the lead person to coordinate joint training programs, communicate with the respective programs and for collaboration of pre-employment transition services and secondary transition activities.
- OPI staff and VR will be available to give joint presentations on pre-employment transition services.
- Provide a copy of this Agreement to the following key stakeholders:
 - all LEA superintendents
 - all directors of Special Education
 - all VR administrative staff
 - VR State Rehabilitation Council

Responsibilities of OPI:

- OPI shall provide supports necessary for LEAs to facilitate and coordinate the smooth transition of students with disabilities from school to post-school employment-related

activities, including working with VR to ensure the receipt of appropriate Pre-ETS, secondary transition services, and competitive, integrated employment.

- OPI shall host an Annual Joint Stakeholders meeting to network, collaborate, communicate and discuss issues regarding services for students and youth with disabilities.
- OPI shall disseminate information regarding relevant training and workshops to VR, including courses available through the Teacher Learning Hub.
- The OPI Data Operations Team will provide the most recent Special Education State Child Count data upon request. A data-driven estimate of the number of students receiving 504 accommodations in the state will also be provided upon request. The OPI Annual Performance Report, which includes exit data information for students with disabilities, will be shared with VR.
- OPI shall provide support to LEAs on how to inform VR of students with disabilities who may need secondary transition or pre-employment services through VR.
- OPI shall provide technical assistance to LEAs concerning the provision of FAPE, including the responsibility to provide assistive technology to assist with the education of students approaching transition to independent living and employment as appropriate.
- OPI shall provide support to LEAs on how to coordinate vocationally related services with VR for eligible and potentially eligible students. Coordination should commence in the early stages of secondary transition. Vocationally related service coordination and corresponding agency responsibilities should be identified in the IEP and included on the student's IPE when appropriate.
- OPI shall provide technical assistance and reference materials to LEAs on how to inform VR of IEP meetings in advance to allow sufficient time for VR to participate, subject to parental approval. The development of vocational goals and objectives shall occur in collaboration with the IEP Team.
- OPI will provide technical assistance and reference materials to LEAs on how to identify transition services needed, including, as appropriate, connections with other entities (e.g., mental health agencies, Social Security Administration) beginning at age 14. OPI will also provide support to LEAs on how to work closely with VR to ensure that interested students with disabilities are identified and referred for Pre-ETS at an early age.

Responsibilities of VR:

- VR shall encourage former students who are still eligible for IDEA services to reenroll in school for further study and training to enhance their opportunities for employment. Such former students shall also be eligible for vocational rehabilitation services customarily provided by VR to adults over the age of 21.
- VR will provide assistive technology services relevant to functions outside those assistive technology services required to access the educational program.
- After termination of enrollment at the LEA, VR will continue to provide the eligible individual with vocational services, i.e., vocational assessment, career exploration, job shadowing, vocational guidance and counseling, and other required services outlined in the IPE.

- VR will accept referrals of students with disabilities during the secondary transition planning process for the provision of Pre-ETS. Students are not required to apply for VR services to receive Pre-ETS.
- VR will provide consultation with LEA district staff on secondary transition planning to prepare a student to move from school to work or post-secondary education in accordance with the student's unique needs as determined through the IEP process and provision of Pre-ETS.
- An IPE which is consistent with, and which takes into consideration the eligible student's IEP, strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice will be developed within 90 days of the VR eligibility determination.
- Students with disabilities who: apply for VR, are determined eligible, and complete an IPE may receive, but are not limited to, services such as: evaluation, career guidance and counseling, medical or psychological services, training, job development and placement services, rehabilitation technology, and/or other services to help them enter and maintain employment.
- VR Staff will provide consultation to assist in the identification of eligible and potentially eligible students with disabilities and assessment of their individual needs for Pre-ETS.
- VR is responsible for providing information to parents and/or guardians, students, and teachers regarding VR eligibility, vocational assessment for employment and postsecondary planning, and the Client Assistance Program.
- VR will offer students who wish to apply for VR the opportunity to complete and sign a VR application form. The student will provide access to available information necessary to determine eligibility and priority for services. Eligibility for VR will be determined within 60 days from the date of application. Students who are only interested in Pre-ETS and do not wish to apply for VR services will be given the opportunity to complete and sign the Student Request Form. Verification of disability and student status will be included on the Student Request Form or provided by the student. For students under age 18, the application and Request Form will be signed by a parent or guardian. VR services (e.g., transportation and maintenance) necessary for students to participate in pre-employment transition services may only be provided to VR eligible students with IPEs.
- VR will obtain written consent for the release of confidential information, pursuant to VR policy and procedures, federal and state laws, and regulations regarding confidentiality.
- VR will share information regarding policies, procedures, guidelines, programs, and services for the purpose of improving the access to and availability of secondary transition services.
- VR will provide brochures and materials about the VR process and services to the LEAs for distribution to students, parents, legal guardians, teachers, and others. VR staff will also be available to provide information on changes in the law or VR policy regarding secondary transition services.
- VR will promote employer participation in providing opportunities for work-based learning for students with disabilities.
- VR is responsible for coordinating the provision of Pre-ETS.
- VR's Pre-ETS Bureau Chief shall coordinate with OPI and LEAs to develop and promote a seamless transition system. The Pre-ETS Bureau Chief will take the lead in working with

OPI and LEAs to ensure that students with disabilities receive Pre-ETS to prepare them for life after high school.

- The Pre-ETS Bureau Chief and Pre-ETS Specialists will meet with staff and other interested parties to develop Pre-ETS contracts, initiate joint training, share best practices and facilitate communication between the parties. The Pre-ETS Bureau Chief will be the contact person for any questions regarding the provision of services under the Pre-ETS contracts.

Financial Responsibilities:

Montana is a local control state in which LEAs are financially responsible for the costs of services they are mandated to provide under the IDEA and Section 504.

- OPI and VR commit to the implementation of complementary programs to assist with the provision of secondary transition and Pre-ETS to students with disabilities in the state, including students with the most significant disabilities, to enable them to achieve an employment outcome in a competitive, integrated setting.
- The IEP team, including VR, will utilize the IEP process to determine services necessary for the student to reach his or her identified post-school outcome and outcome for employment as written in the IEP and IPE and will negotiate and identify the programmatic and financial responsibility of IEP team members, if any.
- Specific criteria are used to determine which agency (LEA or VR) has primary responsibility for providing and paying for transition-related services for students with disabilities. These criteria are:
 - Purpose of the service—Determine if the service is associated with an employment outcome or educational attainment.
 - Customary service—Determine which agency “customarily” provides the service to students.
 - Eligibility for services—Determine how the student with a disability is eligible to receive services.
- VR will provide or arrange for the provision of services required by the IPE when the student has been determined eligible for VR, and the services are specific to his/her employment outcome and are not services customarily provided to the student by the LEA under the IDEA.
- VR is financially responsible for the cost of services for eligible VR students where the purpose of the services is to support an employment goal.
- Under 34 C.F.R. §361.53, the availability of Comparable Services and Benefits, as defined in 34 C.F.R. §361.5(c)(8), will be determined by VR unless such a determination would interrupt or delay the progress of the individual toward achieving the employment outcome identified in the IPE; an immediate job placement; or the provision of VR services to individual determined to be at extreme medical risk.

The following is from the most recent MOU with OPI that details the procedures for outreach to and identification of students with disabilities needing transition services.

- VR assigns a Vocational Rehabilitation Counselor and Pre-ETS Specialist to each public high school in the state. Counselors shall inform students, families, special and regular education teachers, school administrators, advocacy groups, and others about VR.
- VR Counselors and Pre-ETS Specialist will give presentations and distribute both print and electronic materials that explain transition and pre-employment services along with traditional vocational rehabilitation services. The information provided will include a description of the purpose of VR, eligibility requirements, application procedures and scope of services that may be provided to eligible and potentially eligible individuals.
- Students who wish to apply for VR services will be offered the opportunity to complete and sign a VR application form. The student will provide access to available information necessary to determine eligibility and priority for services. Eligibility for VR will be determined within 60 days. Students who are only interested in Pre-ETS and do not wish to apply for VR services will complete and sign the Student Request Form. Verification of disability and student status will be included on the Student Request Form or provided by the student. For students under 18 years of age, the application and Request Form will be signed by a parent or guardian.
- VR will reach out to eligible and potentially eligible students with disabilities who are in need of transition services and Pre-ETS as early as possible through outreach activities such as information sharing at IEP's, transition planning meetings, career fairs, orientations, back to school nights, work with parent support groups, and other activities.
- VR Counselors and Pre-ETS Specialists will work with LEA staff to identify and reach out to all students with disabilities to include those served in special education, those receiving an accommodation under Section 504 of the Rehabilitation Act of 1973, and other students and youth with disabilities. Outreach activities will include students with disabilities receiving school psychological, health, nursing or social work services, and students with disabilities enrolled in an educational program and not in special education. VR will also reach out to youth with disabilities who have dropped out of an education program or students who are at risk of dropping out of high school.
- VR will inform students with disabilities about the availability of and opportunities to exercise informed choice; including the availability of support services for individuals with the most significant disabilities who require assistance in exercising informed choice throughout the vocational rehabilitation process;
- The designated Pre-ETS Specialist will work closely with each LEA to coordinate, identify students and implement Pre-ETS. VR will provide the necessary forms and templates for required documentation including Student Request Forms for Pre-ETS.
- VR will work with the LEA to ensure collaboration between transition services provided under IDEA and the Pre-ETS provided by VR through direct provision of services or through contracts with LEAs and other providers.
- OPI will provide written guidance to LEAs that Pre-ETS funds can only be used to provide the required Pre-ETS to students with disabilities and that Pre-ETS funds are for additional services to students with disabilities, not to pay for the services required under the IDEA. OPI will continue to work with LEAs to ensure that they follow this guidance.

- Not all eligible or potentially eligible students with disabilities will require all five core Pre-ETS services, however, they should receive all requested services, as determined through informed choice and consultation with each student based on their strengths and needs and consistent with their IEP, when applicable.

The following is from the most recent MOU with OPI that details the coordination and documentation requirements for students and youth with disabilities who are seeking subminimum wage employment.

Coordination and Documentation for Subminimum Wage Employment (Section 511(d) of the Rehabilitation Act of 1973):

Under section 511 of the Rehabilitation Act of 1973, no entity, including businesses that hold a special wage certificate as described in Section 14(c) of the Fair Labor Standards Act of 1958, may compensate any individual with disabilities who is 24 years of age or younger at subminimum wage, unless they have met specific requirements including evidence of participation in Transition or Pre-ETS, application for VR and receipt of career counseling, information, and referral services. The purpose of Section 511 is to ensure that individuals with disabilities have access to information and services that will enable them to achieve competitive integrated employment.

Responsibilities of OPI and LEAS under Section 511(d) of the Rehabilitation Act of 1973

- OPI or LEAs may not enter into a contract or other arrangement with an entity for the purpose of operating a program for an individual age 24 or younger under which work is compensated at subminimum wage.
- OPI will provide guidance to LEAs that when a student with a disability is known to be seeking subminimum wage employment, the LEA will share the specific requirements with the student, parents, guardians, and teachers as soon as possible. This information should also be shared with participants during IEP meetings for transition planning.
- The student will be referred to VR, and the Vocational Rehabilitation Counselor will be informed by the LEA that the student is known to be seeking subminimum wage.
- Pursuant to 34 CFR §397.30(b)(1), the LEA will provide VR with documentation that contains at a minimum, the: (i) Youth's name; (ii) Description of the transition services under IDEA and Pre-ETS completed; (iii) Name of the provider of the required service or activity; (iv) Date required service or activity completed; v) Signature of LEA personnel documenting completion of the required service or activity; (vi) Date of signature and (vii) Signature of LEA personnel transmitting documentation to VR; and (viii) Date and method (e.g., hand-delivered, faxed, mailed, e-mailed, etc.) by which document was transmitted to VR. The LEA Personnel must provide the documentation to VR as soon as possible upon completion of the required actions, but no later than 30 calendar days after completion of the required action or 60 days of additional time is needed due to extenuating circumstances. 34 CFR § 397.30(c)(1)(i). Extenuating circumstances should be interpreted narrowly to include unexpected lengthy absences due to illness or family emergency of LEA personnel necessary to produce the documentation due to illness or family emergency or a natural disaster. 34 CFR §397.30(c)(1)(i)(B). When the LEA personnel transmits the final

determination or activity completed to VR, as required by 34 CFR §397.20 and 397.30(a), the LEA personnel must provide a cover sheet that itemizes the documentation that has been provided to VR regarding that student.

- When a student refuses to participate in transition services, the LEA will provide VR with documentation of the refusal to participate. Pursuant to 34 CFR §397.30(b)(2) such documentation must at a minimum contain the: (i) Youth's name; (ii) Description of the refusal and the reason for such refusal; (iii) Signature of the youth or, as applicable, the youth's parent or guardian; (iv) Signature of the LEA personnel documenting the youth's refusal; (v) Date of signatures; (vi) Signature of LEA personnel transmitting documentation of the refusal to the designated State unit; and (vii) Date and method (e.g., hand-delivered, faxed, mailed, emailed, etc.) by which documentation was transmitted to VR. The LEA must provide this documentation to VR within 5 calendar days of the youth's refusal to participate. 34 CFR § 397.30(c)(1)(ii).
- The LEA must retain a copy of all documentation provided to VR.
- The transmittal of all documentation from the LEA to VR will be consistent with the confidentiality requirements of the Family Education Rights and Privacy Act (FERPA) (20 USC 11232g(b) and 34 CFR 99.30 and 99.31) and IDEA (20 USC 1417(c) and 34 CFR 300.622).

Responsibilities of VR under Section 511(d) of the Rehabilitation Act of 1973

- Pursuant to 34 CFR § 397.20(a) documentation of the activities listed below must be provided by VR to the student in an accessible format, as soon as possible after completion of the required action, but no later than 45 calendar days after determination or completion of the required activity or service or within 90 calendar days if additional time is needed due to extenuating circumstances. 34 CFR §397.10(c)(2). Extenuating circumstances should be interpreted narrowly such as unexpected lengthy absence of VR personnel necessary for the production of the documentation due to illness, family emergency or natural disaster. 34 CFR § 397.10(c)(2)(i)(B).
 - The individual has received transition services under (IDEA) or Pre-ETS through VR or the LEA.
 - The individual has applied for VR services and been found ineligible; or applied and was found eligible for VR services and;
 - Had an approved IPE;
 - Had been working toward an employment outcome with appropriate supports and services for a reasonable period of time (determined on an individual basis, but up to 24 months for an individual with a supported employment outcome identified in their IPE) without success; and
 - The individual's case is closed, and
 - Has been provided career counseling, information and referrals to Federal and State programs and other resources in the individual's geographic area that offer employment-related services and supports designed to enable the individual to explore, discover, experience, and attain competitive integrated

employment.

- If a youth with a disability or, as applicable, the youth's parent or guardian refuses, through informed choice, to participate in the activities required by section 511 or the implementing regulations in part 34 CFR part 397, documentation must, at a minimum:
 - Contain the information in 34 CFR § 397.10(a)(2); and
 - The documentation of the youth's refusal must be provided to them in an accessible format within 10 calendar days of their refusal to participate. 34 CFR §397.10(c)(2)(ii).
- The youth will be informed that their right of refusal to participate in the required activities outlined in this section will result in their inability to engage in employment at a sub-minimum wage.
- VR will coordinate with non-educational agencies such as juvenile justice, treatment facilities, or foster care programs for referrals of out-of-school youth with disabilities. These youth will be encouraged to participate in transition services and programs to improve future employment opportunities.
- VR will inform LEA teachers of community events such as job fairs, transition fairs, and career days to introduce students with disabilities to possible career goals.

The following is from the most recent MOU with OPI that includes the assurance that neither the SEA nor the LEA will enter into a contract with an entity for the purpose of operating a program under which youth with a disability are engaged in work compensated at a subminimum wage.

- Neither OPI nor the LEA will enter into an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at a subminimum wage.

VR contracts with LEAs to provide Pre-ETS to students with disabilities. The assurance that the LEA will not enter into a contract with an entity for the purpose of operating a program under which youth with a disability are engaged in work compensated at a subminimum wage is included in the current Pre-ETS School Contract as outlined below:

- The Contractor is prohibited from entering into a contract or other arrangement with any entity who is a 14(c) certificate holder as defined by Section 14(c) of the Fair Labor Standards Act under the U.S. Department of Labor for purposes of operating a program in which students with disabilities are employed at subminimum wage.
- A "14(c) Certificate Holder" is any employer which has been authorized under Section 14(c) of the Fair Labor Standards Act, after receiving a certificate from the Wage and Hour Division, to pay Subminimum wages - wages less than the Federal minimum wage - to workers who have disabilities for the work being performed.

K. COORDINATION WITH EMPLOYERS

In accordance with the requirements in Section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

VR provides multiple services to businesses across Montana, including recruitment, training, retention, and employer incentives. These services are designed to support employers in meeting workforce needs while creating opportunities for individuals with disabilities, including youth and students receiving transition and Pre-ETS services.

Recruitment and acquisition services include accommodation support for employees, ADA training, consultation and evaluation, and assistance in identifying potential employees through multiple methods (such as employer-specific eSkill assessments). VR also partners with WIOA programs like Adult Education and Job Service to assist with basic skill preparation for candidates. Additional services include customized training to meet industry standards, On-the-Job Training (OJT), On-the-Job Evaluations, apprenticeships, job description development, disability-related policy consultation, and disability awareness/sensitivity training. Employers also have access to Work Opportunity Tax Credits, the Federal Bonding Program, and Section 503 compliance support.

Disability management services include accommodation and ergonomic consultation, ADA training and referrals, accessibility guideline support, job/task analysis, and Windmills disability awareness training. Retention services include job coaching, vocational counseling, and emergency operating plan development to help employers retain employees with disabilities.

Employers are considered an additional client of VR, and these services are available regardless of whether they are hiring VR clients or Pre-ETS students.

Enhancing Employer Engagement to Meet Workforce Needs

VR is actively adjusting its practices to better understand and meet industry needs across Montana's workforce. We are intentionally focusing on six identified high-demand sectors:

- Construction Trades
- Health Careers
- Education & Child Care
- Advanced Manufacturing & Computing
- Recreation & Hospitality
- Professional & Finance Services

This approach aligns with the Montana Department of Labor and Industry's recent *Montanans for Hire* report, which revealed that approximately 19,000 working-aged Montanans have left the labor force due to disability or chronic illness. Many more Montanans with disabilities or chronic illness

remain unemployed or underemployed. Reducing barriers to employment for these individuals, including access to apprenticeships, will expand the labor force, provide independence and dignity to Montanans, and strengthen economic opportunity statewide.

Through these efforts, VR is committed to working closely with employers to identify competitive integrated employment and career exploration opportunities, ensuring that individuals with disabilities have access to meaningful work and that Montana's workforce system remains strong and inclusive.

L. INTERAGENCY COOPERATION WITH OTHER AGENCIES

In accordance with the requirements in Section 101(a)(11)(C) and (K), describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

1. STATE PROGRAMS (DESIGNATE LEAD AGENCY(IES) AND IMPLEMENTING ENTITY(IES)) CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

Disability Employment and Transitions Division (DETD), which houses Montana's Vocational Rehabilitation and Blind Services (VRBS) program, acted as the Lead Agency contracting with MonTECH (the Implementing Agency) housed at the University of Montana (UM) to provide the required services of the Assistive Technology (AT) Act of 1998 through September 30, 2022. Following multiple conversations between MonTECH and DETD leadership regarding the benefits and implications of shifting the Lead Agency from the State of Montana to MonTECH, DETD sought approval from the Governor to pursue transfer of Lead Agency role to MonTECH. It was determined that redesignating UM as the Lead Agency for the AT Grant would improve efficiency in managing MonTECH's budget and other administrative tasks. The existing contractual, financial management, and administrative processes were reviewed and it was agreed the change was in the best interest of the stakeholders of the AT program, would be the most effective way to simplify processes, and would have minimal impact to the well-established working relationship between DETD and MonTECH. On June 13, 2022, Montana's Governor sent a letter to the Administration for Community Living formally requesting the transfer. On July 29, 2022, a response letter from ACL was received granting the transfer of Lead Agency to MonTECH.

Since the transfer has taken place, no formal memorandum of understanding or cooperative agreement has been developed between the two agencies. In the coming years, VRBS will pursue an MOU with MonTECH. Despite no formal agreements being in place, VRBS views MonTECH as an integral partner and stakeholder and the programs have continued to cooperate through:

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

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

2. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

At this time, VR is not actively engaged in activities related to programs carried out by the Under Secretary for Rural Development of the Department of Agriculture. While we recognize the potential value of initiatives such as AgrAbility in supporting individuals with disabilities in agricultural settings, the agency has not participated in these efforts recently. VR remains open to future collaboration and opportunities that align with our mission to expand employment options for individuals with disabilities across Montana.

3. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH;

VR continually seeks opportunities for interagency cooperation with non-educational agencies serving out-of-school youth. While VR works closely with statewide workforce development system agencies to serve out-of-school youth, there are non-WIOA agency partnerships as well. The monthly VR Youth Services Team meetings routinely include presentations from different agencies that provide services to youth including out-of-school youth. VR is also partnering with Child Protective Services (CPS) and Chafee providers to reach foster care youth with disabilities.

4. STATE USE CONTRACTING PROGRAMS;

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.

5. STATE AGENCY RESPONSIBLE FOR ADMINISTERING THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT (42 U.S.C. 1396 ET SEQ.);

In late 2022, Montana VR, in collaboration with Montana's mental health block grant program, applied for the Office of Disability Employment Policy's Advancing State Policy Integration for Recovery and Employment (ASPIRE) project. In early 2023, Montana was one of seven states selected to receive tailored, targeted, and intensive technical assistance for integrating state policy, program and funding infrastructures to expand the evidence-based Individual Placement and Support (IPS) model to address the supported employment needs of individuals with serious mental health conditions. Montana's assigned ASPIRE Subject Matter Experts (SMEs) encouraged the Montana ASPIRE team to reach out to and partner with our State Medicaid leadership. The team connected with and enrolled Isaac Coy, the Treatment Bureau Chief, into the Montana ASPIRE team and collaboratively developed an MOU between VR, Mental Health Block Grant (Prevention Bureau), and Medicaid (Treatment Bureau) that was finalized in October 2023.

Since the completion of the initial MOU, Montana participated in a second year of ASPIRE that completed in August 2024. As a result of Montana’s work with ASPIRE, the strong partnership developed between Medicaid, Mental Health and VR has persisted. All agencies continue to meet quarterly and have completed a second iteration of the MOU that was signed into effect on May 2025:

MEMORANDUM OF UNDERSTANDING

Section 1. Parties and Purpose of Agreement:

1.1 The Memorandum of Understanding (“MOU”) is entered between the Department of Public Health and Human Services, Disability Employment and Transitions Division (DET), Vocational Rehabilitation and Blind Services (“VRBS”) and Department of Public Health and Human Services, Behavioral Health and Developmental Disabilities Division (BHDD), Prevention Bureau (“BHDD-Prevention”) and Department of Public Health and Human Services, Behavioral Health and Developmental Disabilities Division (BHDD), Treatment Bureau (“BHDD-Treatment”)

1.2 This agreement is predicated on the beliefs that employment contributes to better overall health and well-being and is a critical mental health intervention for individuals with Serious Mental Illnesses (“SMI”) Individual Placement and Supports (“IPS”) is an evidence Based Practice demonstrating improved employment outcomes for individuals with SMI and must be offered in more locations and by more Community Mental Health Centers (“CMHC”) across Montana to improve access to competitive integrated employment for Montanans with SMI.

1.3 The purposes of this MOU are to:

1.3.1 Describe financial obligations and clarify roles and responsibilities of VRBS, BHDD-Prevention, and BHDD-Treatment.

1.3.2 Share efforts in order to improve competitive integrated employment outcomes for individuals with SMI and enrolled in Individual Placement and Supports (“IPS”) programs.

1.3.3 Outline a collaborative framework of coordinated, cost efficient employment services for individuals with SMI.

1.3.4 Ensure non-duplication in the coordination of services and resources to support provision of IPS services and common clients.

1.3.5 Provide basic guidance for ongoing coordination between VRBS, BHDD-Prevention, and BHDD-Treatment as it relates to implementation, expansion, sustainability, and fidelity of IPS in Montana

Section 2. General Duties and Responsibilities:

2.1 VR operates under the Rehabilitation Act of 1973 (the Act) as amended by the 2014 Workforce Innovation and Opportunity Act (WIOA) and its joint implementing regulations and is responsible for the provision of vocational rehabilitation services within the framework of the Act

and the WIOA joint implementing regulations. VRBS presumes all people with disabilities, including those with the most significant disabilities, can work in competitive integrated settings with advancement opportunities and believes collaborating with partners makes us stronger and more effective.

2.1.a VR agrees to:

- Support 100% the cost of the IPS trainer for the first year (10/1/2023-9/30/2024) of the MOU.
- Explore annually Disability Innovation Funds (“DIF”) grant for additional IPS funding.
- Develop an IPS fee schedule and execute contracts with existing MHBG-funded IPS programs (Yellowstone Boys and Girls Ranch, Inc. and Mountain Home Montana) as well as newly implemented IPS programs in Montana.
- Train one Vocational Rehabilitation Counselor per VRBS office on the IPS model, contracts, processes and procedures by December 31, 2025.
- Create a VRBS IPS Leadership team.
- Meet quarterly to review this document and report on progress on the following dates:
 - April 30, 2025
 - July 9, 2025
 - October 15, 2025
 - May 24, 2024
 - August 23, 2024
- Participate in fidelity reviews.
- Collect data on number served and employment outcomes of those served by VR through an IPS program.

2.1.b VRBS contacts:

- Chanda Hermanson, DETD Administrator, 406-444-4179, Chanda.Hermanson@mt.gov
- Allyson Talaska, Bureau Chief of Field Services, 406-417-5854, Allyson.Talaska@mt.gov
- Lacey Conzelman, Program Supervisor, 406-655-7673, Lacey.Conzelman@mt.gov

2.2 **BHDD-Prevention** provides services through Block Grants, Formula Grants, Discretionary Grants, and Emergency Grants. These are Federal Grants to provide Substance Use Treatment & Prevention, Peer Support Services, Individuals Experiencing Homelessness, and Recovery Support Services. The Prevention Bureau works with a diverse group of stakeholders to help support the

mission of DPHHS: improving and protecting the health, well-being, and self-reliance of all Montanans.

2.2.a BHDD-Prevention agrees to:

- Continue supporting, with available block grant funding, the existing IPS programs through the transition to VRBS and Medicaid funding.
- Support 100% the cost of the IPS trainer starting FFY24 (10/1/2024-9/30/2025) and moving forward.
- Utilize MHBG to garner one or two additional IPS Supported Employment sites in Montana.
- Collaborate with statewide IPS trainer(s) to conduct an annual site review and complete fidelity reviews at each of the MHBG-funded IPS Programs.

Recruit another IPS trainer. 2.2.b BHDD-Prevention contacts:

- Meghan Peel, BHDD Administrator, <mailto:rdecamara@mt.gov> mpeel@mt.gov, 406-444-1290
- Jami Hansen, Prevention Bureau [Chief, Jami.Hansen@mt.gov](mailto:Chief.Jami.Hansen@mt.gov), 406-444-3055
- Justin Harris, Block Grant Section Supervisor, justin.harris2@mt.gov, 406-444-4423

2.3 **BHDD-Treatment** is responsible for the certification of Mental Health Professional Person, State Approval for Substance Use Disorder (SUD) providers, and development of Medicaid Manual for both SUD and Adult Mental Health Services. BHDD-Treatment ensures services are meeting federal and state standards efficiently and effectively. The BHDD-Treatment works with Office of Inspector General (OIG) to provide routine monitoring of programs. BHDD-Treatment also reviews and analyzes Medicaid billing practices with Surveillance Utilization Review Section (“SURS”) and Fraud unit to review costs to ensure practices are being followed by reviewing records from SUD programs that have been licensed by OIG and are state approved. Additionally, BHDD-Treatment provides oversight for the Severe and Disabling Mental Illness (SDMI) Home and Community Based Services (HCBS) 1915 waiver and State funding for crisis diversion.

- 2.3.a BHDD-Treatment agrees to: Meet with existing MHBG-funded IPS programs (Yellowstone Boys and Girls Ranch, Inc. and Mountain Home Montana) to provide education regarding Medicaid billable services specific to the program.
- Meet with newly implemented IPS programs within 30 days of implementation to provide education regarding Medicaid billable services specific to the program.
- Explore methodology to integrate IPS evidence-based practice into the SDMI waiver and/or State Plan.
- Provide a copy of the SDMI psychosocial and strengths assessment tool to the team for review and recommendations.

2.3.b BHDD-Treatment contacts:

- <mailto:rdecamara@mt.gov> Meghan Peel, BHDD Administrator, mpeel@mt.gov, 406-444-1290
- Isaac Coy, Treatment Bureau Chief.icoy@mt.gov, 406-444-7922
- Ashley Bair, Behavioral Health Section Supervisor, ashley.bair@mt.gov, 406-202-9451
- Jean Perrotta, SDMI Waiver Section Supervisor, jperrotta@mt.gov, 406-497-6609

2.4 VRBS, BHDD-Prevention, and BHDD-Treatment mutually agree to:

- Outreach to a minimum of four CMHCs per year to expand IPS programs in Montana and assist with IPS implementation for new programs who want to participate.
- Meet with IPS providers monthly.
- Maintain participation in the International Learning Community for IPS.
- Develop a specialized and Montana-specific steering committee
- Attend the IPS International Learning Community Conference as permitted by respective Administrator.
- Meet quarterly to review this document and report on progress on the following dates:
 - Wednesday April 30, 2025
 - Wednesday July 9, 2025
 - Wednesday October 15, 2025
- Prioritize IPS meeting attendance by attending all scheduled meetings or appointing a designee to attend or communicate in advance the inability to attend and commit to reading meeting minutes/notes.
- Communicate to external stakeholders via attendance at Local Advisory Council and Behavioral Health Alliance of Montana (BHAM) meetings as invited and written information provided via BHDD's weekly newsletter and periodic VR' Friends of Rehab newsletter.
- Jointly create a clear funding guidance tool for distribution to existing MHBG-funded IPS Programs and newly implemented programs.
- Jointly create statewide IPS fidelity procedures and internal controls

Section 3. Expected Outcomes:

- 3.1 Add a minimum of two new IPS sites achieving fidelity.
- 3.2 Ensure IPS trainer positions are staffed and sustainably funded.
- 3.3 Update funding tool as needed for IPS Programs to navigate billing.
- 3.4 Collect and analyze baseline data of successful competitive integrated employment outcomes to monitor progress throughout the duration of this MOU.
- 3.5 Develop and implement internal IPS fidelity procedures and internal controls to monitor high quality service delivery and provide technical assistance to programs not meeting fidelity.
- 3.6 Solidify collaboration among VR, BHDD-Prevention and BHDD-Treatment.

Section 4. Resolution of Conflict:

4.1 In the event that VR, BHDD-Prevention, and/or BHDD-Treatment find themselves in a conflict, the programs agree to meet to discuss the issues and navigate conflict resolution using the programs' respective leadership.

Section 5. Term and Effective Date:

5.1 This MOU is effective on the date signed, May 1, 2025 and shall terminate automatically, without notice to the other party, on April 30, 2026.

5.2 Any party may terminate this MOU with 30 days written notice to the other party.

Section 6. Modification:

This document contains the entire agreement between the parties and any statements, promises, or inducements made by either party, or agents of either party, which are not contained in this MOU shall not be valid or binding. The MOU shall not be enlarged, modified, or altered except upon written agreement signed by all parties to the agreement.

VRBS will continue to work towards developing memorandums of understanding with other programs within the Department of Public Health and Human Services (DPHHS), who manage other Medicaid waivers, such as the Big Sky Waiver/Physical Disability (PD) waiver, to outline the roles and responsibilities of all parties regarding the delivery of VRBS services and long-term supported employment services for individuals with the most significant disabilities who have been determined to be eligible for Medicaid waivers.

6. STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES;

VR has had a long and productive relationship with Montana's Developmental Disabilities Program (DDP). The program continues to sign off for extended long-term support services for many individuals with significant disabilities who have Medicaid cost plans to fund long-term supported employment services. Cross-training and technical assistance between VR and DDP to make available the required supported employment services continues to be ongoing. Unfortunately, a formal signed MOU between DDP and VR has not come to fruition.

Despite a formal MOU, VR leadership has maintained a close working relationship with DDP leadership through monthly meetings and collaboration on projects such as Work and a Social Determinant of Health and Employment 1st. In fall 2024, VR applied for National Expansion of Employment Opportunities Network (NEON), a technical assistance grant from the US Department of Labor begin the work toward becoming an Employment 1st State. Montana was selected as one of the Core States for the final year of that iteration of NEON and worked with subject matter experts to complete an Environmental Scan of Montana for preparedness for Employment 1st. That work was presented to various programs within Montana Department of Public Health and Human Services (DPHHS) including VR and DDP staff and our mutual providers.

Overlapping with the conclusion of NEON in August 2025, VR entered into a contract with the Harkin Institute to continue the Employment 1st work started with NEON. Initially, an Employment 1st workgroup was developed that includes individuals from the DDP, Office of Public Instruction, Department of Labor and Industry, Centers for Independent Living, American Indian Vocational Rehabilitation Training and Technical Assistance Center, Disability Rights Montana, DD and VR Providers, Consumers, Family Members, Disability Advocates, Rural Institute for Inclusive Communities, and Montana Council on Developmental Disabilities. This group began meeting in-person in September 2025 in Red Lodge, MT and again in November in Butte, MT. Upcoming in-person meeting is tentatively scheduled April 21-23 in Browning, MT. The contract with Harkin ends in May 2026 and the final deliverable will be an Employment 1st strategic plan to hold DDP and VR, including the other aforementioned stakeholders, to the mutually determined goals through assignment of tasks and regular check-in meetings for accountability. Meanwhile, VR is applying for the newest iteration of NEON recently announced by the Department of Labor and is hopeful to be selected as a Core State with subject matter experts to continue to provide technical assistance to Montana as we advance through our Employment 1st Strategic plan.

7. STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES; AND

See section L (5) above for the full, collaboratively developed MOU between VR, Mental Health Block Grant (Prevention Bureau), and Medicaid (Treatment Bureau) executed in May 2025.

8. OTHER FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS OUTSIDE THE WORKFORCE DEVELOPMENT SYSTEM.

- VR works closely with the Social Security sponsored Work Incentives Planning and Assistance (WIPA) project at Montana State University-Billings to assist consumers to understand the impact of working on their benefits, including Medicaid. VR continues contracting with the WIPA project to create a Community Work Incentives Coordinator to work specifically with VR clients.
- VR presently has cooperative agreements with the following American Indian Tribal VR programs: Confederated Salish and Kootenai, Fort Belknap, Rocky Boy, Northern Cheyenne, and the Blackfeet. The purpose of these agreements is to establish procedures to assure continued coordination between the American Indian VR programs and the state VR program. These agreements are implemented for the sole purpose of enhancing, to the greatest extent possible, the delivery of rehabilitation services to persons with disabilities living in the state of Montana and residing on or near the five reservations that currently have a tribal vocational rehabilitation project.
- The local VR offices and the local Small Business Development Centers (SBDC) all have well established and productive working relationships with each other. SBDCs share information on classes and upcoming offerings to the VR offices and VR regularly refers clients interested in self-employment to participate in various SBDC trainings and services. VR will explore enhancing our current relationship with SBDCs by exploring a contract to provide technical assistance to our participants who are pursuing self-employment.

- VR is a member of Montana's Work-Based Learning Collaborative which is a group of statewide partners who work together to expand student opportunities, support educators, and support Montana businesses in work-based learning activities.
- VR has contracted with Montana's Department of Military Affairs to provide a unique STEM Careers Summer Camp for high school students with disabilities through their STARBASE program. At the STARBASE camp students participate in challenging “hands-on, minds-on” STEM activities. They interact with military personnel to explore careers and observe STEM applications in the world of work.
- VR is partnering with Montana's Child Protection Services agency to increase opportunities for older youth in foster care to obtain skills necessary for economic stability as adults. VR wants to ensure all youth in foster care who are eligible for Pre-ETS have the opportunity to participate and have the opportunity to apply for VR services should they choose.
- VR has MOUs with various public transportation programs in counties across the state. The MOUs commit to procedures to assist VR’s clients to obtain documentation necessary to receive transportation services at reduced fares.
- VR works with the Social Security Administration to collaborate on employment incentives and supports and to maximize Social Security Administration/Vocational Rehabilitation (SSA/VR) reimbursement activity through the Ticket to Work Program.
- VR routinely collaborates with other organizations to provide training opportunities for VR’ 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 of Independent Living, Office of Public Assistance, Department of Labor and Industry, Cornell-Yang Tan Institute, San Diego State University-Interwork Institute, The Harkin Institute, Office of Public Instruction, Child and Family Services, Children's Mental Health Bureau, Disability Rights Montana, MonTECH, Disability Determination Services, Developmental Disabilities Program, Montana Association for Rehabilitation, MYTransions Project, and the Veteran's Administration.

9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.

VR works with the Montana Association for the Blind and a partnership with their Summer Orientation Program. This partnership increases education and outreach for all of our Blind and Low Vision (BLV) programs with a focus on our Older Individuals who are Blind program.

Montana VR works with the National Federation of the Blind (NFB) to provide the NFB Newline service to Montanans experiencing blindness, low vision, or print disabilities so they are able access publications in an accessible format.

VR has a partnership with Northwest Association for Blind Athletes to help provide access to exercise, sports, and outdoor activities for blind and low vision individuals.

ASSURANCES

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its

supplement, through signature of the authorized individual, assures the Commissioner, that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

The VR agency must select the “Edit” button to review and agree to the VR State plan Assurances.

The State Plan must include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.
3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:
3.a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.
3.b. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
3.c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.
3.d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).
3.e. as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.
3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.

The State Plan must include
3.g. state wideness and waivers of state wideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
3.h. the requirements for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.
3.i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.
3.j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
3.k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.
3.l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).
3.m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:
4.a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act.
4.b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act.
4.c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
4.d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
4.e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act

The State Plan must include
4.g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
4.h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act.
4.i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs.
4.j. With respect to students with disabilities, the State,
4.j.i. has developed and will implement,
4.j.i.A. strategies to address the needs identified in the assessments; and
4.j.i.B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113).
4.j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5. Program Administration for the Supported Employment Title VI Supplement to the State plan:
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
6. Financial Administration of the Supported Employment Program (Title VI):

The State Plan must include
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act.
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.
7. Provision of Supported Employment Services:
7.a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
7.b. The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and (E) of the Rehabilitation Act.

Do you attest that these assurances will be met?

Yes

VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

States must provide written and signed certifications that:

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY TITLE IV OF WIOA^[1], AND ITS STATE PLAN SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT;

^[1] Public Law 113-128.

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

State of Montana, Department of Public Health and Human Services, Disability Employment and Transitions Division, Vocational Rehabilitation and Blind Services.

2. IN THE EVENT THE DESIGNATED STATE AGENCY IS NOT PRIMARILY CONCERNED WITH VOCATIONAL AND OTHER REHABILITATION OF INDIVIDUALS WITH DISABILITIES, THE DESIGNATED STATE AGENCY MUST INCLUDE A DESIGNATED STATE UNIT FOR THE VR PROGRAM (SECTION 101(A)(2)(B)(II) OF THE REHABILITATION ACT). AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (DESIGNATED STATE AGENCY OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT)[2] AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[3], THE REHABILITATION ACT, 34 CFR 361.13(B) AND (C), AND ALL APPLICABLE REGULATIONS[4], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE TO STATES UNDER SECTION 111(A) OF THE REHABILITATION ACT ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

ENTER THE NAME OF DESIGNATED STATE AGENCY

State of Montana, Department of Public Health and Human Services.

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY, OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT, AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[5], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[6], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER TITLE VI ARE USED SOLELY FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES AND THE ADMINISTRATION OF THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

^[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

^[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

4. THE DESIGNATED STATE UNIT OR, IF NOT APPLICABLE, THE DESIGNATED STATE AGENCY HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE VR PROGRAM IN ACCORDANCE WITH 34 CFR 361.13(B) AND (C);

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Chanda Hermanson

8. THE (ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND THE SUPPLEMENT FOR SUPPORTED EMPLOYMENT SERVICES;

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Disability Employment and Transitions Division Administrator

9. THE AGENCY THAT SUBMITS THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT HAS ADOPTED OR OTHERWISE FORMALLY APPROVED THE PLAN AND ITS SUPPLEMENT.

FOOTNOTES

^[1] Public Law 113-128.

^[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

^[3] No funds under title I of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

[4] Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76, 77, 79, 81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3474; and the State VR Services program regulations at 34 C.F.R. part 361.

[5] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

CERTIFICATION SIGNATURE

To review and complete the Certification section of the VR portion of the State plan, please select the “Edit” button.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Signatory information	Enter Signatory information in this column
Name of Signatory	Chanda Hermanson
Title of Signatory	Disability Employment and Transitions Division Administrator
Date Signed	03-04-2024

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

The submission of expected levels is the first step in the negotiations process. Once the expected levels of performance have been submitted, State VR programs may begin negotiations with RSA’s State Monitoring and Program Improvement Division. Each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or

Combined State Plan during the required two-year modification process) in accordance with 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan’s approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers (ESE)

The ESE indicator has been defined in the ESE final rule and PY 2024 was the first year of data for the newly defined performance indicator. However, a minimum of at least two baseline years of data must be collected to support a statistical adjustment model that could produce sufficiently reliable estimates for the purposes of performance negotiations and state performance assessments. The Departments, in accordance with 20 CFR § 677.190(c)(4) and 34 CFR §§ 361.190(c)(4) and 463.190(c)(4), will collect and monitor state ESE performance results for at least PY 2024 and PY 2025 to establish a credible baseline and provide technical assistance. After PY 2025 data are collected the Departments will develop a statistical adjustment model for ESE in accordance with section 116(b)(3)(A)(viii) of WIOA. Since the ESE indicator is a statewide measure that reflects a combined result across WIOA titles I, II, III, and IV programs, the Departments will jointly engage in negotiations with state representatives from all core programs when feasible. While states are not required to submit expected levels of performance for Effectiveness in Serving Employers for PY 2026 and PY 2027 all of core programs are expected to collect data and report as a shared indicator (as directed in guidance) for these years.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	55.7%		55.8%	
Employment (Fourth Quarter After Exit)	52.5%		52.5%	
Median Earnings (Second Quarter After Exit)	\$3840		\$3950	
Credential Attainment Rate	31%		31%	

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Measurable Skill Gains	55.2%		55.3%	
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹ The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2026 and 2027.

General Education Provision Act Section 427 Assurance - Vocational Rehabilitation

Section 427 of the General Education Provisions Act (GEPA) ([20 U.S.C. 1228a](#)) applies to applicants for grant awards under this program. All applicants for new grant awards must include the following information in their applications to address this provision in order to receive funding under this program. ([OMB Control Number 1894-0005](#))

- Compliance can be found on the following page(s) of the application:
 - A. State Rehabilitation Council, 5. Provide the VR agencies response to the council's input and recommendations, Response to recommendation #6
 - B. Comprehensive Statewide Needs Assessment (CSNA). 1. The VR services needs of individuals with disabilities residing within the State, D. Youth with disabilities, including students with disabilities and their need for Pre-Employment Transition Services. Include an assessment of the needs of individuals with disabilities for transition career services and Pre-Employment Transition Services, and the extend to which such services are coordinated with transition services provided under IDEA, Challenges to Pre-ETS Services
 - D. Evaluation and Reports of Progress: VR and Supported Employment Goals, 1. Progress in achieving the goals and priorities identified for the VR and Supported Employment programs, Goal 1
 - J. Coordination with Education Officials, 2. Describe the current status and scope of the formal interagency agreement between the VR agency and the State educational agency. Consistent with the requirements of the formal interagency agreement pursuant to 34 C.F.R. § 361.22(b), provide, at a minimum, the following information about the agreement, A-F

General Education Provision Act Section 427 Assurance - Supported Employment

Section 427 of the General Education Provisions Act (GEPA) ([20 U.S.C. 1228a](#)) applies to applicants for grant awards under this program. All applicants for new grant awards must include the following information in their applications to address this provision in order to receive funding under this program. ([OMB Control Number 1894-0005](#))

Compliance can be found on the following page(s) of the application:

- A. State Rehabilitation Council, 5. Provide the VR agencies response to the council's input and recommendations, Response to recommendation #6
- B. Comprehensive Statewide Needs Assessment (CSNA). 1. The VR services needs of individuals with disabilities residing within the State, D. Youth with disabilities, including students with disabilities and their need for Pre-Employment Transition Services. Include an assessment of the needs of individuals with disabilities for transition career services and Pre-Employment Transition Services, and the extend to which such services are coordinated with transition services provided under IDEA, Challenges to Pre-ETS Services
- D. Evaluation and Reports of Progress: VR and Supported Employment Goals, 1. Progress in achieving the goals and priorities identified for the VR and Supported Employment programs, Goal 1
- J. Coordination with Education Officials, 2. Describe the current status and scope of the formal interagency agreement between the VR agency and the State educational agency. Consistent with the requirements of the formal interagency agreement pursuant to 34 C.F.R. § 361.22(b), provide, at a minimum, the following information about the agreement, A-F

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

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

[24] States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan

would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

JOBS FOR VETERANS' STATE GRANTS

(OMB Control Number: 1293-0017)

Components of the Jobs for Veterans State Grants State Plan

Jobs for Veterans State Grants (JVSG) recipients must provide a four-year state plan as a condition for the receipt of annual funding in accordance with 38 U.S.C. § 4102A(c). This plan must include responses to each of the components below.

A. DESCRIBE HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING, AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG PROGRAM (I.E., VIRTUALLY AND IN-PERSON).

Veterans and eligible persons receive employment, training, and job placement services at Job Service Montana (JSM) offices. Veterans and eligible spouses (or covered persons), are required to complete a Veteran Screening Tool prior to referral to Disabled Veterans' Outreach Program (DVOP) staff in a JSM office. The Veteran Screening Tool is located at the front counter at all JSM offices. Staff have been trained to request completion of the screening tool to determine eligibility prior to referral to the DVOP. DVOP staff are located in JSM offices. All customers entering these locations will be screened for Veteran status and DVOP eligibility.

DVOP staff are expected to provide individualized career services through case management framework taught through NVTI for Veterans with barriers to employment, including VR&E enrolled Veterans. This includes a comprehensive assessment, individual employment plan and consistent contact. The goal is to provide veterans and eligible persons with the tools to be successful in the job search. DVOP staff will work one on one with eligible veterans and assist with resume writing and review, interview concepts and skills and job searching techniques. DVOP staff will provide consistent contact" per VPL 05-24 as the third element of case management.

MTDLI's business engagement team will also promote advantages of hiring veterans as they conduct employer outreach activities. This team serves all regions across the state and has connections to economic development groups, local chambers, and industry organizations, and can serve as an additional statewide resource to the JVSG program.

Montana has one of the highest concentrations of veterans in the nation, ranking 3rd among states. About half of Montana veterans are under the age of 65. Nearly 8% of veterans in Montana live in poverty and slightly less than a third have a service-related disability. Montana also has strong rates of active service members, and both the Air National Guard and Army National Guard actively recruit in the state.

Currently, most programs supporting veteran transition into civilian employment are operating independently, without sufficient coordination or collaboration. Better communication among partners is needed to reduce barriers to civilian employment for veterans. Because MTDLI has oversight of JVSG funds used to support transitioning military service members, veterans, and eligible spouses, assisting them to access training and maximize employment opportunities, our goal within the 406 JOBS Work Plan is for the SWIB to convene a stakeholder group to strengthen services across the state. Specific year-one tasks within the 406 JOBS work plan under JVSG is to complete an inventory of all veteran-serving programs within the state of Montana and develop a plan to restructure statewide programs to improve quality of service and client access, including JVSG. Included in this restructure is the proposed addition of a supervisor within the Job Service network who will directly oversee the DVOP's and assist with better JVSG program execution statewide.

B. LIST THE POPULATIONS TO BE SERVED BY DISABLED VETERANS' OUTREACH PROGRAM (DVOP) AND CONSOLIDATED POSITION STAFF, INCLUDING THE ELIGIBILITY CRITERIA FOR REFERRAL FOR DVOP SERVICES.

VOPs are charged with providing case management and individualized careers services through case management to eligible veterans and eligible spouses with barriers to employment and additional populations determined by the Secretary of Labor to be in need of DVOP services as outlined in Veterans Program Letters (VPLs).

Below are the eligibility criteria as described in 38 USC 4211(4) used to determine "eligible veteran":

- Served on active duty for a period of more than 180 days and was discharged with other than a dishonorable discharge.
- Was discharged or released from active duty because of a service-connected disability.
- As a member of a reserve component under an order to active duty pursuant to section 12301(a), (d), or (g), 12302, or 12304 of title 10, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge.
- Was discharged or released from active duty by reason of a sole survivorship discharge.

DVOP specialists must limit their activities to providing services to eligible populations who:

Are interested in receiving one or more individualized career services, and meet at least one of the following two criteria:

- Are defined as an eligible veteran or eligible person and are experiencing at least one of the qualifying employment barriers defined in Section VI.A.1 below; or
- Are members of additional populations eligible for DVOP specialist services as authorized by the current annual appropriations act, as outlined in Section VI.A.2. below.

1. Qualifying Employment Barriers. To receive DVOP services, an eligible veteran or eligible person must affirm that they are experiencing at least one of the following employment barriers:

a. Has a disability, which may include any of the following:

Special disabled veteran, defined in 38 U.S.C. § 4211(1) as a veteran who is 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 for a disability rated at 30 percent or more, or rated at 10 or 20 percent in the case of a veteran who has been determined to have a serious employment handicap; or person who was discharged or released from active duty because of a service-connected disability.

Disabled veteran, defined in 38 U.S.C. § 4211(3) as a veteran who is 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^{1F2}; or a person who was discharged or released from active duty because of a service-connected disability.

Other disability. Eligible veterans and eligible persons who self-identify as having a disability, as defined by the Americans with Disabilities Act, 42 U.S.C. § 12102.

b. Is a Vietnam-era veteran, as defined by 38 U.S.C. § 4211(2) as an eligible veteran any part of whose active military, naval, or air service was during the Vietnam era, as defined by 38 U.S.C. § 101(29).

c. Is a recently separated veteran, defined in 38 U.S.C. § 4211(6) as a veteran who was discharged or released from active duty within the last three years.

d. Has been referred for employment services by a representative of the Department of Veterans Affairs.

e. Is experiencing homelessness, as defined in Sections 103(a) and (b) of the McKinney Vento Homeless Assistance Act (42 U.S.C. § 11302(a) and (b)).

f. Is justice-involved, as defined in WIOA Section 3(38), 29 U.S.C. § 3102(38) (definition of “offender”).

g. Is between the ages of 18–24 years of age at the time of enrollment.

h. Is educationally disadvantaged, meaning that the individual lacks a high school diploma or equivalent certificate.

i. Is economically disadvantaged, which means any of the following:

- Meets the definition of a low-income individual in WIOA Section 3(36), 29 U.S.C. § 3102(36).
- Unemployed.
- Heads of single-parent households containing at least one dependent child. Note: An eligible person must personally meet eligibility criteria. In other words, they must both: a) meet the definition found in 38 U.S.C. § 4101(5), and b) be experiencing at least one of the criteria listed above (e.g., homeless, justice-involved, etc.). An eligible person who is not a veteran may not claim eligibility for DVOP services based on their spouse's status as, for example, a Vietnam-era veteran.

2. Additional Populations. Annual appropriations acts may authorize JVSG staff to serve certain non-veteran populations. Continued service to these individuals is contingent upon future appropriations act authorization. States are responsible for consulting with the DVET and reviewing the appropriations act each year to ensure DVOP specialists are serving only eligible populations. At the time of publication of this VPL, Congress has authorized DVOP specialists to serve, and LVERs to work with employers on behalf of, the following additional populations:

- a. Transitioning Service Members (TSM) who, at the time of enrollment have participated in any part of the Transition Assistance Program, including self-paced online modules and Individualized Initial Counseling.
- b. Wounded, ill, or injured members of the Armed Forces who are receiving treatment in military treatment facilities or warrior transition units.
- c. Spouses or other family caregivers of those wounded, ill, or injured service members.

C. DESCRIBE THE ROLES AND RESPONSIBILITIES ASSIGNED TO DISABLED VETERANS' OUTREACH PROGRAM (DVOP) SPECIALISTS, LOCAL VETERANS' EMPLOYMENT REPRESENTATIVE (LVER) STAFF, AND CONSOLIDATED DVOP/LVER POSITIONS BY THE STATE. THESE MUST BE CONSISTENT WITH 38 U.S.C. 4103A AND 4104.

DVOPs provide a range of services including career planning and counseling and comprehensive outreach to locate veterans in need of individualized services accomplished through the case management approach as taught by NVTI. These services include:

- Comprehensive Assessment, including a documented plan of service (IEP) and consistent contact.
- Counseling and career/vocational guidance.
- Referral of veterans to supportive or remedial services.
- Promoting Vocational Rehab and WIOA services.
- Referral of veterans to job focused and outcome-driven training or certification.
- Job development.
- Development of VA-funded Special Incentive and OJT.
- Review all open case files of current participants with an Significant Barrier to Employment in a priority category and perform case management duties.
- Referral of veterans to employment opportunities.

D. DEMONSTRATE THE MANNER IN WHICH DVOP, LVER AND CONSOLIDATED DVOP/LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEMS OR AMERICAN JOB CENTER (AJC). THIS DEMONSTRATION SHOULD SHOW ACTIVE ENGAGEMENT BETWEEN JVSG AND OTHER AJC STAFF, SUCH AS THROUGH PARTICIPATION IN STAFF MEETINGS AND CROSS-TRAINING OPPORTUNITIES.

Disabled Veterans Outreach Specialists (DVOPs) are co-located with, integrated into, and managed by JSM. JVSG Program Manager coordinates all program and policy changes with JSM.

DVOP specialists are fully integrated into the JSM service delivery system. They participate in office staff meetings, case staffing discussions and employer outreach coordination to ensure collaboration with Wagner-Peyser staff, WIOA Title 1-B staff and other partner programs. Through ongoing collaboration and shared case management practices, DVOPs ensure Veterans receive priority of service and targeted assistance designed to address identified employment barriers. This integrated approach strengthens service alignment, reduces duplication of services and improves employment outcomes for Veterans and eligible spouses.

E. DESCRIBE THE STATE'S PERFORMANCE INCENTIVE AWARD PROGRAM TO ENCOURAGE INDIVIDUALS AND/OR EMPLOYMENT SERVICE OFFICES TO IMPROVE AND/OR ACHIEVE EXCELLENCE IN THE PROVISION OF SERVICES TO VETERANS, INCLUDING:

1. THE NOMINATION AND SELECTION PROCESS FOR ALL PERFORMANCE INCENTIVE AWARDS TO INDIVIDUALS AND/OR OFFICES;

The Performance Incentive Award Program is operated in accordance with VPL 01-24.

The incentive awards encourage JVSG-funded staff and JSM offices to strive for excellence and encourage retention of quality staff.

JVSG staff and WIOA/Wagner-Peyser funded employees must be nominated by JSM Management for the award. JSM Managers can nominate their office for the office awards.

The total amount of funds available for Performance Incentive Awards will total one percent of the total JVSG awarded to the state. The awards will be presented in cash, with the higher amounts going to those who achieve excellence. The number of nominations for office and individual awards varies each year as does the total incentive amount.

Performance Incentive Awards will be designated into two categories, individual and office and each category will have a gold and silver level award. A selection process will occur for each category. The State JVSG Program manager will review and score all individual and office nominations for award selection. The performance awards will be presented during the last quarter of the federal fiscal year. A detailed report of the performance award-obligated funds will be provided with the fourth quarter report.

To be considered for a Performance Incentive Award staff and offices must be nominated based on accomplishments, efforts to build veteran coalitions and fast-track veteran training and employment options. The award process is open to all JVSG staff and WIOA/Wagner-Peyser funded employees who serve veterans, staff includes:

- Disabled Veterans' Outreach Program (DVOP) specialists;
- Individuals providing employment, training, and placement services to veterans under the Workforce Innovation and Opportunity Act (WIOA), including labor exchanges funded by the Wagner-Peyser Act; and an employment service team or office.

Offices and individuals who have been nominated will be scored in the categories described above on a scale of 1 to 5 for each category based on the following criteria:

- Development of a program for which the impact may not be directly measurable (e.g., a resume skill-building program).
- Promotion of entry into federal employment.
- Outstanding case management.
- Outreach/community relations efforts, e.g., Chambers of Commerce, employers.
- Efforts to assist hard-to-place populations (e.g., veterans experiencing homelessness).
- Collaborative success in providing all services to veterans, which may include success in employer relations and "great customer service" to veteran clients.

The State JVSG Program Manager within the Data & Operations Bureau will administer the funds and all the funds will be presented in cash awards. The award amount will be dependent on the number of nominations for both individual and team awards. All awards will be based on

performance or activities that occurred during the program year for which the award is given. In accordance with VPL 01-24, incentive award funds will be obligated by September 30 and expended by December 31 of each FY.

2. THE APPROXIMATE NUMBER AND VALUE OF CASH AWARDS USING THE ONE PERCENT INCENTIVE AWARD ALLOCATION;

The estimated cash amounts for individual and office awards will be based on the incentive amount awarded each year and will be categorized as follows:

- 2 gold level individual awards valued at \$1500 for each award
- 3 silver level individual awards valued at \$500 for each award.
- 2 superior office awards are valued at \$1000 for each award.

3. THE GENERAL NATURE AND APPROXIMATE VALUE OF NON-CASH PERFORMANCE INCENTIVE AWARDS TO BE CHARGED TO THE BASE ALLOCATION; AND

All performance incentive awards will be awarded as cash, non-cash performance incentive awards will not be utilized by the State.

4. ANY CHALLENGES THE STATE MAY ANTICIPATE TO CARRYING OUT A PERFORMANCE INCENTIVE AWARD PROGRAM AS MANDATED BY 38 U.S.C. § 4102A(C). THIS SHOULD INCLUDE ANY STATE LAWS OR POLICIES THAT PROHIBIT SUCH AWARDS, IF APPLICABLE. DESCRIBE THE STATE'S EFFORTS IN OVERCOMING THOSE CHALLENGES.

The State does not have any laws or policies that prohibit performance incentive awards.

F. LIST THE PERFORMANCE TARGETS FOR DIRECT SERVICES TO VETERANS PROVIDED BY JVSG STAFF, AS MEASURED BY PARTICIPANTS':

- Employment rate in the second quarter after exit from the program;
- Employment rate in the fourth quarter after exit; and
- Median earnings in the second quarter after exit.

JVSG -Expected Levels of Performance	PY 2026	PY 2027
Employment Rate 2nd Q after exit	55.0%	55.0%
Employment Rate 4th Q after exit	52.5%	52.5%
Median Earnings 2nd Q after exit	\$6,250	\$6,250

SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)

(OMB Control No. 1205-0040)

A. ECONOMIC PROJECTIONS AND IMPACT

1. DISCUSS LONG-TERM PROJECTIONS FOR JOBS IN INDUSTRIES AND OCCUPATIONS IN THE STATE THAT MAY PROVIDE EMPLOYMENT OPPORTUNITIES FOR OLDER WORKERS. (20 CFR 641.302(D)) (MAY ALTERNATIVELY BE DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN.)

According to the U.S. Census Bureau's Quarterly Workforce Indicators for data ending data ending 2023Q1, healthcare and social assistance sectors are the primary employer for those 55 and above in Montana, followed by retail, accommodations, and food services. The healthcare also shows anticipated annual growth of over 820 new jobs until 2032, (Montana Employment Projections, 2022 to 2032). Professions such as nursing, medical and dental assistance, pharmacy technicians, and home health and personal care aides rank among Montana's top job openings and workforce requirements over the past decade and continuing into the foreseeable future. While these roles are suitable for older workers, certain physical strength prerequisites for home health and personal care aides might pose challenges for some individuals.

Jobs in the retail trade industry offer distinct advantages for older workers seeking part-time employment while maintaining a semi-retired lifestyle. The retail trade industry is poised to be among the top five sectors in terms of job growth, with an estimated 500 new jobs annually from 2022 to 2032. Within this industry, the sales and related occupation group is the third highest occupation group by anticipated demand, with an expected 7,990 job openings each year through 2032. This employment landscape provides an opportunity for older individuals to participate in the workforce while enjoying the flexibility offered by part-time roles.

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))

Prior to placing participants at host agency sites, an Individual Employment Plan (IEP) is developed with each participant. Participants undergo intensive evaluations of their previous work experience and current skill sets which helps to identify their type(s) of past employment, current skills and abilities, interests, and training needs.

Based on the results of the IEP and further evaluation and assessment, SCSEP sub-grantee staff work with participants to identify an industry sector of interest and ultimately find placement in customized training programs designed to bolster their capabilities and align with the dynamic demands of either the healthcare industry or the retail trade industry. If they work well in "meet and greet" situations such as in retail, then staff arranges for the participant to meet with a host-agency to determine their ability to train the participant in the needs of that specific occupation. Ideally, the participant is placed with that host agency and ultimately hired. If the host agency is not a good fit, SCSEP staff continues working with the participant to determine if they need more training in a field of interest or if it's simply a matter of finding them a suitable placement with other host-agencies in that sector.

Montana SCSEP maintains partnerships with a variety of host agencies ranging from local food pantries and shelters and thrift stores to senior centers, schools and recreation facilities, veteran organizations, government agencies such as county services, the Veterans' Administration, and state agencies. Participants' community service assignments are carefully selected based on their training needs and employment goals. Partners are informed that placing participants in their agencies depends entirely on the participant's skill development needs.

Successful partnering with a wide variety of partners in the service areas occurs frequently through longstanding partnerships with non-profits and strong relationships with partners inside the American Job Centers and the wider WIOA network, providing a pipeline of referrals of potential participants and assisting in identifying community service providers as potential hosts. As participants are placed in host-agency training, the needs of the participants and their goals are considered, and partners develop a variety of assignments that reflect those needs.

The host-agency assignment may change to accommodate the participant's training goals. For example, a participant might begin their assignment greeting customers, then move into an assignment where they are training in office functions, gaining clerical experience and developing computer skills that enables them to assist with data entry. This training may lead to an assignment with another host-agency if there are no opportunities to advance in their current host-agency.

Each participant's journey through the program is individualized and conducted at the pace that fits the participant's needs. Experience shows that some participants quickly gain the skills necessary to move into unsubsidized employment while others need more time to train and upgrade their soft skill sets before they are ready to enter the workforce.

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))

As outlined in sections a.1 and a.2, the healthcare and retail trade industries are the focal points for SCSEP participants. These sectors exhibit substantial workforce needs. While many key healthcare occupations necessitate some post-secondary education below the bachelor's degree level, rendering them suitable for short-term training, opportunities in the retail trade industry typically have lower educational requirements. The demand within both industries spans across all regions of Montana. Targeting these sectors ensures opportunities for workers from diverse backgrounds and education levels. Depending on the individual's background and skills, SCSEP candidates can swiftly undergo re-skilling to align with the requirements of various occupations within these two industries.

Prior to placing participants at host agency sites an Individual Employment Plan (IEP) is developed with each participant. Through the IEP process participants undergo intensive evaluations of their previous work experience and current skill sets which helps to identify the type(s) of employment they have done in the past, their current skills and abilities, their interests and their training needs.

Based on the results of the IEP and further evaluation and assessment, SCSEP sub-grantee staff work with participants to identify the industry sector they are interested in and ultimately help them find placement in customized training programs designed to bolster their capabilities and align with the dynamic demands of either the healthcare industry or the retail trade industry. If they work well in “meet and greet” situations such as in retail then staff arranges for the participant to meet with the host-agency specializing in that type of business to determine their ability to train the participant to meet the needs of that specific occupation. Ideally, this all comes together, and the participant is placed with that host agency and ultimately hired. If the host agency is not a good fit, for whatever reason, SCSEP staff continue working with the participant to determine if they need more training in the field they’re interested in or if it’s simply a matter of finding them a suitable placement with other host-agencies in that sector.

Montana SCSEP maintains partnerships with a variety of host agencies ranging from local food pantries and shelters and thrift stores to senior centers, schools and recreation facilities, veteran organizations, government agencies such as county services, the Veterans’ Administration, or state agencies. Participants’ community service assignments are carefully selected based on their training needs and employment goals. Partners are educated to understand that placing participants in their agencies depends entirely on the participant’s skill development needs.

Successful partnering with a wide variety of partners in the service areas is occurring frequently through longstanding partnerships with non-profits and strong relationships with partners inside the American Job Centers and the wider WIOA network, which provides a pipeline of referrals of potential participants and assists in identifying community service providers who could be potential hosts. As participants are placed into host-agency training, the needs of the participants and their goals are considered then partnerships that will ensure a variety of assignments to fulfill the training needs of current and incoming individuals are developed.

The assignment within the host-agency may change to accommodate the participant’s training goals. For example, a participant may begin their assignment greeting customers, then may move into an assignment where they are training to learn office functions, gaining clerical experience and developing computer skills, enabling them to assist with data entry. This training may lead to an assignment with another host-agency if there are no opportunities to advance in their current host-agency.

Each participant’s journey through the program is individualized and conducted at the pace that fits the participant’s needs. Experience shows that some participants quickly gain the skills necessary to move into unsubsidized employment while others need more time in training and upgrading their soft skillsets before they are ready to enter the workforce.

B. SERVICE DELIVERY AND COORDINATION

1. A DESCRIPTION OF ACTIONS TO COORDINATE SCSEP WITH OTHER PROGRAMS. THIS MAY ALTERNATIVELY BE DISCUSSED IN THE STATE STRATEGIES SECTION OF THE STRATEGIC PLAN, BUT REGARDLESS OF PLACEMENT IN DOCUMENT, MUST INCLUDE:

A. PLANNED ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH WIOA TITLE I PROGRAMS, INCLUDING PLANS FOR USING THE WIOA ONE-STOP DELIVERY SYSTEM AND ITS PARTNERS TO SERVE INDIVIDUALS AGED 55 AND OLDER. (20 CFR 641.302(G), 641.325(E))

Coordination of SCSEP activities with WIOA Title I programs is essential in ensuring older workers receive services needed to obtain meaningful community service activities that lead to unsubsidized employment. In Montana this is accomplished through (1) engagement in Community Management Teams (CMT) made up of core and community-based partners located across the state; and (2) through coordination of services in the One-Stop system.

The SCSEP sub-grantee, Easterseals-Goodwill Northern Rocky Mountain (ESGW NRM) refers all participants to Wagner-Peyser for job search assistance, client registration, and assessment. Once a client intake is complete, the client may then be referred to other WIOA Title I programs and partner programs for co-enrollment as appropriate. ESGW NRM partners with AJCs and other entities who serve as host agencies for SCSEP participants. ESGW NRM is also working with several economic development entities across the state to collaborate and leverage resources for the best outcomes for SCSEP participants and to avoid duplication of services. Working and coordinating with partners ensure training and employment strategies are based on local markets and relevant to SCSEP participants. ESGW NRM also has a dedicated recruiter.

B. PLANNED ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH THE ACTIVITIES BEING CARRIED OUT IN THE STATE UNDER THE OTHER TITLES OF THE OLDER AMERICANS ACT (OAA). (20 CFR 641.302(H))

Montana's SCSEP grantee, through a contract with the State SCSEP sub-grantee ESGW NRM, partners with and administers some of the following programs under OAA:

- AARP
- Adult Protective Services Transportation Advisory Councils
- Community-based health centers
- Community-based transportation providers
- Montana's Area Agencies on Aging
- Montana Department of Labor & Industry Programs
- Montana Independent Living Centers
- Private non-profit agencies providing employment services
- Veteran service providers
- County Extension offices
- Vocational Rehabilitation and Blind Services
- Montana's Native American tribes

- Community-based organizations, including:
 - Easterseals Goodwill (ESGW)
 - Good Samaritan
 - St. Vincent DePaul
 - Salvation Army Ministries
 - Rocky Mountain Development Council
 - Human Resource Development Council
 - Habitat for Humanity
 - Local food banks

Montana’s SCSEP coordinates activities with the groups listed above by partnering, attending conferences and job fairs, and coordinating education opportunities about SCSEP. AJCs and many of the community-based organizations also serve as host agencies for training of SCSEP participants. The SCSEP grantee will continue to coordinate services across partner programs and seek additional opportunities to expand partnerships. Activities and coordination of services across partners, include, but aren’t limited to:

1. Job fairs;
2. Conferences;
3. Participation in community-based boards or councils designed to coordinate services across common populations, including seniors;
4. Economic development boards or groups, like local Chambers of Commerce or other business groups.

C. PLANNED ACTIONS TO COORDINATE SCSEP WITH OTHER PRIVATE AND PUBLIC ENTITIES AND PROGRAMS THAT PROVIDE SERVICES TO OLDER AMERICANS, SUCH AS COMMUNITY AND FAITH-BASED ORGANIZATIONS, TRANSPORTATION PROGRAMS, AND PROGRAMS FOR THOSE WITH SPECIAL NEEDS OR DISABILITIES. (20 CFR 641.302(I))

Montana’s SCSEP coordinates with partner agencies that focus on serving individuals with disabilities throughout the state. Partner agencies and programs include, but are not limited to:

1. Vocational Rehabilitation and Blind Services administered through Montana’s Department of Public Health and Human Services;
2. Montana’s Independent Living Project;
3. Businesses and host agencies engaged in employment and training for participants; and
4. Other workforce programs administered throughout the state;

Montana’s SCSEP grantee works with community-based organizations throughout the state to best serve individuals’ specific needs and location.

D. PLANNED ACTIONS TO COORDINATE SCSEP WITH OTHER LABOR MARKET AND JOB TRAINING INITIATIVES. (20 CFR 641.302(J))

SCSEP has not participated in planning processes to apply for DOL-funded industry training initiatives; however, the ESGW participates at the local and community level across the state as a part of the Community Management Team, and through economic development collaborations within regions throughout the state. ESGW has SCSEP offices located in Great Falls, Missoula, Kalispell, and Billings. Due to Montana's geographic size and industry mix, the Employment Specialists in the region work collaboratively with area partners to identify industry sectors, workforce development opportunities and needs within the region. This enables SCSEP to work within the groups to ensure training opportunities are appropriate and available to prepare older participants for employment.

E. ACTIONS TO ENSURE THAT SCSEP IS AN ACTIVE PARTNER IN THE ONE-STOP DELIVERY SYSTEM AND THE STEPS THE STATE WILL TAKE TO ENCOURAGE AND IMPROVE COORDINATION WITH THE ONE-STOP DELIVERY SYSTEM. (20 CFR 641.335)

To facilitate coordination through the One-Stop system, Montana SCSEP participates at the community level by participating in Community Management Teams and other community-based workforce initiatives. The grantee's participation ensures older workers are afforded the same opportunities as any other subgroup receiving services through workforce programs.

F. EFFORTS TO WORK WITH LOCAL ECONOMIC DEVELOPMENT OFFICES IN RURAL LOCATIONS.

Montana SCSEP works with the Montana Business Assistance Connection (MBAC). MBAC, anchored in Helena, is an economic development entity serving several Montana counties that assists the sub-grantee by sharing SCSEP opportunities with other businesses and community partners.

To ensure the program has a community presence, staff work with community-based partners outside the One-Stop system including public libraries, other social service agencies and private businesses.

2. THE STATE'S LONG-TERM STRATEGY FOR ENGAGING EMPLOYERS TO DEVELOP AND PROMOTE OPPORTUNITIES FOR THE PLACEMENT OF SCSEP PARTICIPANTS IN UNSUBSIDIZED EMPLOYMENT. (20 CFR 641.302(E)) (MAY ALTERNATIVELY BE DISCUSSED IN THE STATE STRATEGIES SECTION OF STRATEGIC PLAN.)

Montana SCSEP coordinates with the state's One-Stop System bringing awareness of the program to demonstrate the benefits of hiring older workers. Due to the success of working with our One-Stop system and placements of SCSEP participants in unsubsidized employment across the state. Montana SCSEP will continue this practice.

3. THE STATE'S LONG-TERM STRATEGY FOR SERVING MINORITY OLDER INDIVIDUALS UNDER SCSEP. (20 CFR 641.302 (C))

Montana's SCSEP mission in providing services to minorities includes serving ethnic minorities, immigrants, and refugees. At a minimum, the state's goal is to serve minority populations in the same proportion as their presence in the eligible population currently served. The analysis of the

Program Year 2021 (PY21) minority report indicates that the overall service to the minority population of participants served by Montana SCSEP level was 22%, compared to the census percentage of 13.5% and the total percent difference was 163%- well above the standard of 80%.

The grantee receives the annual minority report of Montana's minority population from the USDOL. Montana uses this report to determine the best plan for serving minority populations across the state, if the program is underserving minority populations.

Montana SCSEP actively recruits minority participants through direct outreach to minority churches, organizations, community-based agencies who serve minority populations, and multi-cultural populations. SCSEP staff also conducts guest lectures and workshops to help inform, connect and recruit participants and employers. In addition, SCSEP advertises in local newspapers, including tribal newspapers, and senior publications to promote the benefits of this program.

Montana SCSEP directly serves clients on reservations in Bighorn and Lake counties and is active on the remaining five reservations to ensure services are available to potential program participants.

The long-term strategy for increasing services and outcomes for minority populations is to build on current relationships with community-based partners, who trust the program and can speak to the benefits of participating. Montana SCSEP identifies where services to minorities are most needed through an analysis of the need for services in any areas where there are noted disparities.

A list of community services that are needed and the places where these services are most needed. Specifically, the plan

4. A LIST OF COMMUNITY SERVICES THAT ARE NEEDED AND THE PLACES WHERE THESE SERVICES ARE MOST NEEDED. SPECIFICALLY, THE PLAN MUST ADDRESS THE NEEDS AND LOCATION OF THOSE INDIVIDUALS MOST IN NEED OF COMMUNITY SERVICES AND THE GROUPS WORKING TO MEET THEIR NEEDS. (20 CFR 641.330)

Between Montana's state and national grantees, SCSEP serves 45 of the 56 counties across the state. ESGW notes that the communities that most need the SCSEP program are the most challenging to serve. These rural communities are often extremely isolated with limited commerce, lack community service assignments that align with capabilities of our seniors, which translates to, little to no employment opportunities. Most Montana counties fall under the hard-to-serve designation for both the national and state SCSEP grantees.

Statewide there is more demand for SCSEP services than the current grantee has the capacity to provide. Low population densities and large distances between clients in hard-to-serve, remote counties makes service delivery particularly challenging.

Senior populations that benefit from community service work are those with time and energy, seniors over 65, ex-convicts, retired people (especially farmers and ranchers), all age groups if capable of physical work, the unemployed, and economically disadvantaged older persons.

Common local community service needs in Montana include:

1. Janitors, cooks, librarians, teacher aides, or mentoring in schools

2. Prison Roles
3. Tourism
4. Landscaping along streets or in parks
5. Office support services for nonprofits and government offices
6. Making signs
7. Career development
8. Advising local businesses
9. Cleaning rest areas
10. After-school programs and childcare
11. Gift-shop attendants
12. Service attendants for food pantries and clothing give-away programs

5. THE STATE'S LONG-TERM STRATEGY TO IMPROVE SCSEP SERVICES, INCLUDING PLANNED LONG-TERM CHANGES TO THE DESIGN OF THE PROGRAM WITHIN THE STATE, AND PLANNED CHANGES IN THE USE OF SCSEP GRANTEEES 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))

Montana SCSEP focuses on serving eligible clients by providing training opportunities to improve or build skill levels for jobs available in communities. The long-term program goal is to assure job retention. This occurs when job matching is appropriate for both the employer and older worker and results in the betterment of the state's economy.

To ensure participants obtain the skills necessary to compete in the modern workforce, SCSEP staff:

1. Help SCSEP participants attain skills that will fill the employment needs of the state
2. Work with nonprofit agencies to provide meaningful community service assignments to fill community needs
3. Reach out to previously untapped agencies to engage them in SCSEP
4. Assist the business community in finding ways to attract and employ older workers
5. Educate businesses about the value of hiring older workers by providing professional marketing materials to educate and engage host agencies and employers
6. Continue to coordinate with Montana's One-Stop system
7. Braid services to American Indians by working more closely with WIOA 166 grantees
8. Expand Area Agencies on Aging referrals

9. Develop and sustain partnerships with groups that advocate and provide services to people with disabilities, minority populations, and veterans
10. Expand coordination with the state's Aging and Disability Resource Center (ADRC program; and
11. Expand business relationships with Montana Chambers of Commerce

6. THE STATE'S STRATEGY FOR CONTINUOUS IMPROVEMENT IN THE LEVEL OF PERFORMANCE FOR SCSEP PARTICIPANTS' ENTRY INTO UNSUBSIDIZED EMPLOYMENT, AND TO ACHIEVE, AT A MINIMUM, THE LEVELS SPECIFIED IN OAA SECTION 513(A)(2)(E)(II). (20 CFR 641.302(F))

Montana SCSEP has developed the following strategies for continuous improvement for successful employment placements of participants:

1. Directing job placements specific to the areas where the participant resides. SCSEP has been successful in placing participants in unsubsidized employment with community service agencies and host agency training sites. A significant portion of SCSEP's unsubsidized placement occurs when the community service training site hires SCSEP participants who trained on-site.
2. Identifying current and future regional jobs
3. opportunities, local employment trends and job openings;
4. Partnering with Montana's One-Stop system
5. Tracking labor market information
6. Establishing Workforce Partnerships to continue awareness building. SCSEP staff have established relationships with the following workforce partners:
 - a. Job Service, which administers WIOA Title I Adult and Dislocated Worker programs, the Wagner-Peyser program;
 - b. Vocational Rehabilitation Services;
 - c. Adult Services and Aging programs;
 - d. Adult Education programs; and
 - e. Local economic development and business associations.
7. Upgrading and maintaining participant skillset; and
8. Ongoing assessment of skills

SCSEP participants are assessed utilizing a variety of tools, some through the American Job Centers, as well as through consultation with their Employment Specialist. An Individual Employment Plan (IEP) is created with the participant and based on the IEP the participant may receive job readiness skills to prepare them for an assignment or placed directly on an assignment with a host agency.

Training online through GFCGlobal.org is available to those that have internet/computer access at home or in ESGW offices. Many participants take advantage of this training as it can be done at any time from any computer. Each potential applicant is assessed to determine their interests and current skill level. Participants are assessed for their physical abilities and offered a general physical to ensure participants are trained and placed in appropriate employment settings. Assessment is ongoing for participants based on their IEP, which may be revised as needed throughout their participation in the program.

SCSEP expands and reinforces partnerships with the business community to gather input on workforce needs. SCSEP works closely with business partners to ensure participants are adequately trained to meet the job requirements before placement. Input from the business community enables Montana SCSEP and the workforce community to provide more meaningful training opportunities for older workers and find opportunities for unsubsidized job placement with a higher degree of retention.

IN ADDITION TO STRATEGIES FOR CONTINUOUS IMPROVEMENT LISTED ABOVE, ESGW PROVIDES QUARTERLY REPORTS TO THE STATE SCSEP GRANTEE, C. LOCATION AND POPULATION SERVED, INCLUDING EQUITABLE DISTRIBUTION

1. A DESCRIPTION OF THE LOCALITIES AND POPULATIONS FOR WHICH PROJECTS OF THE TYPE AUTHORIZED BY TITLE V ARE MOST NEEDED. (20 CFR 641.325 (D))

ESGW serves clients statewide, and Montana is geographically large and rural state which creates service delivery challenges. Montana SCSEP works with partners to address these obstacles. These partners include:

1. AARP
2. Adult Protective Services Transportation Advisory Councils;
3. Community-based health centers;
4. Community-based transportation providers;
5. Montana's Area Agencies on Aging;
6. Montana Department of Labor & Industry Programs;
7. Montana Independent Living Centers;
8. Private non-profit agencies providing employment services;
9. Veteran service providers;
10. County Extension offices;

Community-based organizations, including:

1. Easterseals-Goodwill;
2. Good Samaritan;

3. St. Vincent DePaul;
4. Salvation Army Ministries;
5. Rocky Mountain Development Council;
6. Human Resource Development Council;
7. Habitat for Humanity;
8. Local food banks; and
9. A relationship with state-wide correctional facilities and Probation and Parole offices has also been established to recruit more participants in need.
10. Vocational Rehabilitation and Blind Services; and
11. Montana's Native American tribes.

Service delivery in Custer, Fallon, Fergus, Jefferson and Judith Basin counties are more challenging due to the remote location or limited economic opportunities. In contrast, the most populated areas such as Missoula, Gallatin, and Yellowstone counties have majority of hard-to-serve seniors.

The state collects, monitors, and analyzes community service needs throughout the state on an ongoing basis. ESGW uses information collected by the state, including labor market information, economic reports, and other information provided through the state of Montana's Data and Operations Bureau to understand the state's workforce and economic picture and target training and outreach based on data provided.

2. List the cities and counties where the project will be conducted. Include the number of SCSEP authorized positions and indicate where the positions changed from the prior year.

County	Cities	PY'24 State Grantee AP	PY'24 National Grantee AP	PY'25 State Grantee AP	PY'25 National Grantee AP
<i>Beaverhead</i>	Dillon	0	2	0	1
Big Horn	Pryor, Harden, Lodge Grass	2	0	4	0
<i>Blaine</i>	Chinook	0	2	0	2
<i>Broadwater</i>	Townsend	0	2	0	0
<i>Carbon</i>	Red Lodge	0	3	0	3
Carter	Ekalaka	0	0	0	0
Cascade	Great Falls, Cascade, Belt	5	13	6	14

County	Cities	PY'24 State Grantee AP	PY'24 National Grantee AP	PY'25 State Grantee AP	PY'25 National Grantee AP
<i>Chouteau</i>	Fort Benton	0	2	0	0
Custer	Miles City, Lame Deer, Ashland	1	2	0	4
<i>Daniels</i>	Scobey	0	1	0	0
<i>Dawson</i>	Glendive	0	1	0	5
<i>Deer Lodge</i>	Anaconda	0	4	0	0
<i>Fallon</i>	Baker	0	1	0	0
<i>Fergus</i>	Lewistown	0	3	0	6
Flathead	Kalispell, Whitefish, West Glacier, Big Fork, Coram	8	14	8	15
Gallatin	Bozeman, Belgrade	4	8	5	0
Garfield	Jordan	0	0	0	0
<i>Glacier</i>	Cut Bank, Browning	0	6	0	0
Golden Valley	Ryegate	0	0	0	0
<i>Granite</i>	Philipsburg	0	1	0	2
<i>Hill</i>	Havre	0	3	0	3
<i>Jefferson</i>	Boulder	0	2	0	2
<i>Judith Basin</i>	Stanford	0	1	0	1
Lake	Polson, Elmo, Ronan, Pablo	5	4	6	5
Lewis and Clark	Helena, East Helena, Augusta, Lincoln	6	6	6	9
Liberty	Chester	0	0	0	0
<i>Lincoln</i>	Libby	0	10	0	9
<i>Madison</i>	Virginia City	0	3	0	2

County	Cities	PY'24 State Grantee AP	PY'24 National Grantee AP	PY'25 State Grantee AP	PY'25 National Grantee AP
McCone	Circle	0	1	0	0
Meagher	White Sulphur Springs	0	1	0	1
Mineral	Superior	0	2	0	2
Missoula	Missoula, East Missoula, Frenchtown	7	14	7	13
Musselshell	Roundup	0	2	0	2
Park	Livingston	0	5	0	0
Petroleum	Winnett	0	0	0	0
Phillips	Malta	0	2	0	2
Pondera	Conrad	0	2	0	2
Powder River	Broadus	0	1	0	1
Powell	Deer Lodge	0	1	0	1
Prairie	Terry	0	0	0	1
Ravalli	Hamilton, Stevensville, Corvallis, Darby	5	11	0	0
Richland	Sidney	0	3	0	3
Roosevelt	Wolf Point	0	3	0	3
Rosebud	Forsyth	0	3	0	3
Sanders	Thompson Falls	0	5	0	5
Sheridan	Plentywood	0	1	0	1
Silver Bow	Butte	0	11	0	9
Stillwater	Columbus	0	2	0	2
Sweet Grass	Big Timber	0	1	0	1

County	Cities	PY'24 State Grantee AP	PY'24 National Grantee AP	PY'25 State Grantee AP	PY'25 National Grantee AP
<i>Teton</i>	Chouteau	0	2	0	1
<i>Toole</i>	Shelby	0	2	0	1
Treasure	Hysham	0	0	0	0
<i>Valley</i>	Glasgow	0	3	0	2
<i>Wheatland</i>	Harlowton	0	1	0	1
<i>Wibaux</i>	Wibaux	0	0	0	0
Yellowstone	Billings, Park City, Ballantine, Laurel	9	24	8	23
TOTAL AP		50	200	50	168
	<i>Counties not served by State Grantee</i>				
	Counties not served by SCSEP				

3. Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.

Montana SCSEP relies on USDOL’s data system, GPMS, for the number of authorized and modified positions available in the quarter, the current number of enrollments and terminations at the end of each quarter and the variance by county. MTDLI and the sub-grantee use this website to manage the number of slots to assure equitable distribution of positions.

While Montana SCSEP counties were showing as underserved at the end of the PY’24 final quarter, state program participants exceeded the authorized position numbers of 6 enrollments. State SCSEP expects that the variances in these counties will decline or be eliminated now that the sub-grantee is once again fully staffed and focused on recruitment. Montana SCSEP will continue to work toward equitable distribution for each county by focusing on: (1) recruitment in the currently underserved counties through increased coordination efforts with WIOA, Older Americans Act programs, private and public entities, and local economic development offices; and (2) training participants online- a practice the state began during the COVID-19 pandemic.

4. THE STATE’S LONG-TERM STRATEGY FOR ACHIEVING AN EQUITABLE DISTRIBUTION OF SCSEP POSITIONS WITHIN THE STATE THAT:

A. MOVES POSITIONS FROM OVER-SERVED TO UNDERSERVED LOCATIONS WITHIN THE STATE IN COMPLIANCE WITH 20 CFR 641.365.

There have been no significant increases of eligible persons in any of Montana SCSEP counties. The common goal for the SCSEP grantee is to distribute the workers served by the program in accordance with the equitable distribution of positions per county.

The SCSEP grantee is 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 data. Under-enrollment in some counties may be due to the large, rural, sparsely populated areas that have a higher unemployment rate than the state's average unemployment rate. Over-enrollment in some counties likely relates to their urban makeup. The concentrated population in these counties generally leads to a push to enroll more participants because they provide the most opportunities for outreach to potential enrollees and employers.

B. Equitably serves rural and urban areas.

The national SCSEP grantee has authorized positions in thirty eight counties out of the total fifty-six counties in Montana. Eight of these counties also have state-designated positions. Even with population shifts each year that causes 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)

Montana state SCSEP priority for service is provided to eligible individuals who meet one or more of the following criteria:

1. Aged 65 years or older
2. Have a disability
3. Have limited English proficiency or low literacy skills
4. Reside in a rural area
5. Are veterans or their spouses who meet the requirements of the Jobs for Veterans Act
6. Have low employment prospects
7. Have failed to find employment after using services provided through the One-Stop delivery system
8. Are homeless or at risk of homelessness
9. Was formerly incarcerated or under supervision from release from prison or jail within five (5) years of the date of initial eligibility determination.

Montana's SCSEP goal is to serve all of these populations in proportion to their percentage of the total population. Each applicant's eligibility is determined by an interview and documented on an

intake form. Montana SCSEP Employment Specialists are trained to identify all participants' barriers that qualify as most in need.

The long-term strategy for increased services to these populations is through additional training, community outreach, participation in job fairs or other community recruitment or education events, and increased partnerships with organizations serving any of the priority populations listed above.

State SCSEP policy was updated in 2021 by adding formerly incarcerated individuals to the priority for service list of eligible individuals based on guidance in TEGL 17-20. The priority allows the formerly incarcerated identified as having barriers to employment and are most-in-need an additional 12 months of participation under Montana's Individual Durational Limitation (IDL) policy.

Montana's SCSEP sub-grantee educates community partners serving justice involved individuals about SCSEP and explains the potential for employment and training support. One goal for serving formerly incarcerated individuals is to meet with those who are nearing their release date to determine their eligibility for SCSEP so that the individual is ready to enter SCSEP upon release. The SCSEP data information system reported that 120% of Montana SCSEP participants served in the 4th quarter of PY'25 were formerly incarcerated individuals.

5. THE RATIO OF ELIGIBLE INDIVIDUALS IN EACH SERVICE AREA TO THE TOTAL ELIGIBLE POPULATION IN THE STATE. (20 CFR 641.325(A))

Montana uses the most current Equitable Distribution Report to reflect the number of eligible individuals in each county to the total eligible population in the state.

As of 2020, 53.4% of Montanans (579,177) resided in urban areas and 46.6% (505,048) in rural areas based on the US Census Bureau's recent updates to urban and rural definitions.

Montana had 22 areas defined as urban areas in the 2020 Census. These Census Urban Areas are generally cities, and occasionally consolidated city-counties. The Urban Areas are Anaconda-Deer Lodge County, Belgrade, Billings, Bozeman, Butte-Silver Bow, Columbia Falls, Dillon, Glendive, Great Falls, Hamilton, Havre, Helena, Kalispell, Laurel, Lewistown, Libby, Livingston, Miles City, Missoula, Polson, Sidney, Whitefish.

Source: https://www2.census.gov/geo/docs/reference/ua/2020_Census_ua_st_list_all.xlsx

6. THE RELATIVE DISTRIBUTION OF ELIGIBLE INDIVIDUALS WHO:

A. RESIDE IN URBAN AND RURAL AREAS WITHIN THE STATE

The SCSEP Equitable Distribution report is the primary means for providing the state with the data it needs to ensure all eligible populations and target groups are properly served. The formula outlines the service level to individuals residing in urban and rural areas within the state, those that have the greatest economic need, minorities, individuals with limited English proficiency, and those who have the greatest social need.

Montana is a geographically large state with ongoing challenges including:

1. Shortages of quality host agencies that can provide the training .that matches the employment goals for participants.
2. Shortages of employers that have a presence in the rural areas that are seeking new employees in general.
3. The economy in some of the counties is depressed.
4. Public transportation is less likely to be available in rural communities.

B. HAVE THE GREATEST ECONOMIC NEED

Currently close to 90% of Montana’s SCSEP participants are living in poverty and many of them are finding it necessary to work to pay for necessities, including food, housing, healthcare, and transportation. Many SCSEP participants are below the age of 65 and may not receive Social Security benefits, therefore, they need to supplement their income through employment.

C. ARE MINORITIES

In Montana, American Indians are the main minority population at 13 % of the total participants. This minority population is underserved in SCSEP based on the eligible population. Montana has eight recognized tribal nations and seven reservations, three of which are in or near the most heavily populated counties. Montana SCSEP works with local agencies and representatives in areas on or near the reservations to target recruitment activities. The following are minority statistics of participants pulled from the PY’244th quarter end performance report: American Indian 13%, Asian/Native Hawaiian/Pacific Islander 0%, Black or African American 8% Hispanic, Latino or Spanish Origin 8%. The SCSEP grantee is made aware of individuals who are new to communities and may need SCSEP training opportunities through professional networks and Montana’s One-Stop system.

D. ARE LIMITED ENGLISH PROFICIENT

As of the PY’24th quarter report 13% of participants served were those that are limited English proficient. The SCSEP grantee uses the same recruitment techniques for individuals who are limited English proficient as the recruitment of other most-in-need populations. Recruitment efforts include recruitment through the One-Stop system; advertisements; local organizations; and working closely with local community members of ethnic or cultural groups to identify limited-English speaking individuals.

E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))

Due to the rural nature of Montana, many individuals served under SCSEP qualify as having the greatest social need. Criteria includes participants with little or no employment history, no basic skills, no high school education or identified as a high school drop-out, English language deficient, disabled, homeless, or living in a socially or economically isolated area where there are limited employment opportunities.

There is currently no metric for social need outside of measuring individuals with disability. SCSEP's PY'24 4th quarter end show that 50% of enrolled participants had some form of disability with 0% of those individuals having a severe disability.

F. FORMERLY INCARCERATED INDIVIDUALS, AS DEFINED IN TEGL 17-20

**Most in Need Characteristics
PY '24 4th Quarter End (total of last 4 quarters)**

Category	Total Participants	% of Participants
65 years of age or older	12	22
Has a disability	25	46
limited English proficiency	5	9
Resides in a rural area	1	233
Veteran or eligible spouse of veteran	10	22
Has low employment prospects	37.30	98
Failed to find employment after utilizing Title WIOA service opportunities	0	0.00
Homeless or at risk for homelessness	43	80
Formerly incarcerated	11	20

Eight participants were enrolled in the first quarter of PY'24 using the formerly incarcerated most in need characteristic. At the end of the 4th quarter, the total number of participants increased to 11 with the overall percentage at 20. Montana SCSEP's goal is to work with those individuals who were formerly incarcerated or under supervision from release from prison or jail within five years of the date of initial eligibility determination. SCSEP staff meets with individuals who are nearing their release date to determine their eligibility for SCSEP so they are ready to enter the program as soon as they are released.

Montana's SCSEP has an ongoing relationship with Adult Probation and Parole offices to collaborate on serving mutual customers. Staff also work with the probation and parole officers to coordinate the release of participants for training at host agencies as part of their preparation for work. Employment is a big part of that equation, therefore parole and probation officers and SCSEP employment specialists work closely together toward the goal of identifying opportunities for employment and reintegration of the participant into the workforce as quickly as possible.

The SCSEP sub-grantee also receives referrals from both the men and women’s pre-release center facilities. The majority of the current enrollees that meet this particular most in need characteristic have been incarcerated or under supervision over the last five years.

Recruitment efforts include educating community partners about the SCSEP program and the potential for training and employment support for this population; presentations by SCSEP staff at Community Management Team meetings; and job fairs, food banks, and senior housing centers across the state. SCSEP staff provide information about SCSEP enrollment criteria and the barriers that these applicants face as formerly incarcerated individuals.

Employability issues often impact applicants that have old charges and cannot be enrolled in SCSEP using this most in need characteristic. Those individuals are being enrolled into the other most in need characteristics of “low employment prospects” and/or “homeless or at risk of being homeless” categories so that they can be enrolled and served through SCSEP. There is no data available to show how many of those enrolled in either of these two characteristics were formerly incarcerated.

7. A DESCRIPTION OF THE STEPS TAKEN TO AVOID DISRUPTIONS TO THE GREATEST EXTENT POSSIBLE, WHEN POSITIONS ARE REDISTRIBUTED, AS PROVIDED IN 20 CFR 641.365; WHEN NEW CENSUS OR OTHER RELIABLE DATA BECOME AVAILABLE; OR WHEN THERE IS OVER-ENROLLMENT FOR ANY OTHER REASON. (20 CFR 641.325(I), 641.302(B))

Montana SCSEP ensures that individuals who want to work have the opportunity to work through SCSEP services. The US Department of Labor provides the position distribution factors based on current census data. The distribution factor is the formula for defining the equitable share of SCSEP positions for each county based on the proportion of income and age-eligible population by county annually. Montana SCSEP determine which counties are over or underserved and calculates the movement of positions in order to bring about equity. Montana’s SCSEP grantees ensure there is minimal disruption to service delivery due to redistribution of funds. The equitable distribution report is submitted annually to US Department of Labor for approval.

CAREER AND TECHNICAL EDUCATION PROGRAMS AUTHORIZED UNDER PERKINS V

(20 U.S.C. 2301 et sequ.)

Prepared in Accordance with the Provisions of The Strengthening Career and Technical Education for the 21st Century Act.

INTRODUCTION

The Montana Board of Regents of Higher Education (Board of Regents) is the designated state board to coordinate the development and submission of the state plan for career and technical education as required by the Strengthening Career and Technical Education for the 21st Century Act.

The State agencies responsible for career and technical education in Montana are the Academic Research and Student Affairs unit of the Office of the Commissioner of Higher Education (OCHE) and the Division of Career, Technical and Adult Education of the Office of Public Instruction (OPI).

OCHE is the pass-through agency for the Carl D. Perkins Grant.

Through this mid-cycle update, Montana is incorporating this Perkins V State Plan into the PY 2024–2027 WIOA Combined State Plan, creating a single combined plan that aligns workforce development and career and technical education under the 406 JOBS framework Montana is ensuring that Perkins CTE programs, WIOA services, and Adult Education operate as one coordinated talent development system.

The Board of Regents, therefore, submits this Four-Year Montana State Plan for Career and Technical Education under provisions of Perkins V covering the state fiscal years 2024-2027.

In some elements of this plan, when OCHE and OPI take separate actions with the eligible recipients they serve, their activities will be noted separately. However, when the two agencies take action together for fulfilling various requirements, such as in implementation of the CTE Programs of Study, they will be referred to as “the Partner Agencies.”

In submitting this plan, Montana wishes to acknowledge the participation and input of the State Plan Advisory Committee, appointed in conformity with the requirements of Montana Law (MCA 20-7-330). Members of the State Plan Advisory Committee are Paddy Flemming, Director, Montana Manufacturing Extension Center; Lily Apedaile, Director, Office of Health Research and Partnership, University of Montana; Dan Durglo, Director of Operations, S&K Technologies; James Easton, Montana Chamber Foundation Workforce Specialist; Bill Ryan, Education Coordinator, Dick Anderson Construction; and Mary Heller, Montana Ready Coordinator, Montana Office of Public Instruction.

A. PLAN DEVELOPMENT AND CONSULTATION

A.1. STAKEHOLDER CONSULTATION

Overview

The Montana State Plan was developed in consultation with CTE educators, eligible recipients including tribal colleges, parents, students, adult CTE providers, guidance counselors, interested community representatives, and representatives of special populations, business and industry, and labor organizations in the state.

A CTE Stakeholder Survey was one mode of stakeholder engagement we used. There were 1,333 responses to the survey, with most responses coming from CTE teachers, high school students, college faculty and staff, and business/industry representatives. The survey helped the Partner Agencies identify career related opportunities, priorities, and goals for the following stakeholder groups: students, teachers, counselors, administrators, industry partners, State agency and nonprofit staff, tribal organizations, and community members in the state.

The survey addressed the following topics to inform strategies and activities referred to in this plan:

- alignment between secondary and postsecondary programs to industry and workforce needs in the state.
- integration of employability skills within CTE courses/programs.

- potential barriers for students, teachers, parents, administrators, etc. to take advantage of existing opportunities.

Some of the most valuable information gained from the CTE survey included:

- 96% of respondents agree that quality CTE options for students are important to strengthen Montana’s economy.
- 90% of respondents believe that work-based learning opportunities are very or extremely important for a student’s education.
- Respondents identified career fairs/career exploration events, workplace tours, job shadows, internships, and apprenticeships/pre-apprenticeships as the most important activities to prioritize for Montana students.
- 67% of students indicate they want to obtain a 4-year degree or higher.
- 57% of students say that they are not sure if their school offers credits for work-based learning.
- The majority of students, teachers, and school administrators indicate that the largest barrier existing for students wanting to take advantage of work-based learning opportunities is lack of time/flexibility in student schedules.

Additionally, the work of preparing the Montana State Plan benefited from the assistance of the State Plan Advisory Committee, which was appointed in conformity with the requirements of Montana Law (MCA 20-7-330). Members of the State Plan Advisory Committee are Paddy Flemming, Director, Montana Manufacturing Extension Center; Lily Apedaile, Director, Office of Health Research and Partnership, University of Montana; Dan Durglo, Director of Operations, S&K Technologies; James Easton, Montana Chamber Foundation Workforce Specialist; Bill Ryan, Education Coordinator, Dick Anderson Construction; and Mary Heller, Montana Ready Coordinator, Montana Office of Public Instruction.

In compliance with Montana statute, the Advisory Committee consists of four representatives from secondary and postsecondary education and two representatives from business/industry.

Recommendations of the Advisory Committee include:

- data and accountability
- Montana’s vision and goals for career and technical education and workforce development
- strategies for program improvement in areas such as work-based learning, teacher and faculty recruitment and retention, and meaningful collaboration between secondary, postsecondary and industry partners
- Allotment of Funds including the percentage used for Reserve Funding, percentage used for individuals in State Institutions, and the secondary/postsecondary split.

Required Stakeholder Consultation Groups

1. Representatives of secondary and postsecondary CTE programs

2. Parents, students, and community organizations
3. The State workforce development board (Workforce Innovation and Opportunity Act 29 U.S.C. 3111)
4. Representatives of special populations
5. Representatives of business and industry
6. Representatives of agencies serving out-of-school youth, homeless children and youth, and at-risk youth ((section 722(d)(3) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11432(d)(3))
7. Representatives of Indian Tribes and Tribal Organizations
8. Individuals with disabilities
9. The Governor

Stakeholder Outreach

The following table details how members of each of the required stakeholder consultation groups were engaged in the State Plan process.

Date(s)	Description of outreach event/activity	Groups represented
October 2023 through February 2024	CTE Stakeholder Survey	1,2,3,4,5,6,7,8,9
November 8, 2023 December 18, 2023 January 9, 2024 February 2, 2024	Perkins Advisory Committee meetings	1,2,5,6,7
May 17-18, 2023 November 16-17, 2023	Montana Board of Regents of Higher Education Public Meetings	1,2,3,4,6,7,8,9
August 2-3, 2023 February 14, 2024	Montana Two-Year Leadership Meeting	1,2,5
September 11-12, 2023	Montana Education Interim Committee	1,2,3,4,5,6,7,8,9
September 27-29, 2023	Future at Work Summit	1,2,3,4,5,6,7,8,9
October 11, 2023	Montana State Workforce Innovation Board Public Meeting	1,3,4,5,9
October 19-20, 2023	Montana Association of Career and Technical Education Institute	1,2,5,6,7
October 6, 2023	Montana Work-based Learning Collaborative	1,2,3,4,5,6,7,8,9
December 4, 2023	WIOA & Perkins Joint Stakeholder Meeting - Salish Kootenai College	1,2,3,4,5,6,7,8
January 20, 2024	Montana Association of Career and Technical Education Board of Directors Meeting	1,2,5,6,7

January 14, 2024	Montana Board of Public Education	1,2,3,4,5,6,7,8,9
January 25, 2024	Montana Tribal College Data 'Unconference'	1,2,4,5,6,7,8
February 8, 2024 February 22, 2024	Public Hearings	1,2,3,4,5,6,7,8,9
October 3, 2023 October 23, 2023 February 1, 2024	OPI Parent's Committee	1,2,4,5
March 4, 2024	State Agency Leadership	2,3,5,6
February 27, 2024	Governor's Office Consultation	9

A.2. INPUT FROM RELEVANT AGENCIES

The **Montana Board of Regents of Higher Education** is the governing body for the State of Montana and as such oversees the Perkins grant implementation.

The **Office of the Commissioner of Higher Education** is the eligible agency for the Perkins grant in the State of Montana and as such oversees grant administration.

OCHE is also the State agency responsible for supervision of community colleges and other two-year postsecondary institutions primarily engaged in providing postsecondary career and technical education.

The **Montana Office of Public Instruction** is the State agency that oversees Perkins funding for eligible secondary districts.

These two agencies have jointly written the Perkins State plan and, with the State Plan Advisory Committee, developed the portion of the plan relating to the amount and uses of any funds proposed for postsecondary career and technical education, tech prep education, nontraditional and special populations, students in institutions and secondary career and technical education.

If a State agency finds that a portion of the final State plan is objectionable, that State agency shall file its objection with the Office of the Commissioner of Higher Education and OCHE will provide a copy of the objection and the response to the Secretary.

A.3. PUBLIC COMMENT

The Montana Office of the Commissioner of Higher Education and the Office of Public Instruction jointly conducted two public hearings for the purpose of affording all segments of the public and interested organizations an opportunity to engage with and make recommendations regarding the State plan. Due to long travel distances to public meetings in Montana and to allow widespread participation in the hearing process, the formal public hearings were conducted via video conference.

The hearings originated in Helena directed by the Partner Agencies and were open to public attendance. The hearings were announced and shared via email and postings a month prior. The public hearings began with a detailed briefing of all aspects of the State plan, and participants were

then given time to present oral statements and to present written statements as well. The hearings took place on February 8, 2024, and February 22, 2024.

A recording of the hearings, a copy of hearing notices, mailing lists used for notification, and a summary of recommendations and comments made by attendees are maintained on file at the eligible agency.

The Four-Year plan was posted for the required sixty days from March 1, 2024 – April 30, 2024, for public written comment. A summary of the comments and the eligible agency’s responses are included in the appendices.

B. PROGRAM ADMINISTRATION AND IMPLEMENTATION

B.1. STATE’S VISION FOR EDUCATION AND WORKFORCE DEVELOPMENT

B.1.A. STATE-SUPPORTED WORKFORCE DEVELOPMENT ACTIVITIES

The Montana State Workforce Innovation Board (SWIB) continues to support and require meaningful coordination of services and education partners to ensure Montana has a well-trained workforce and continues to grow economically. The SWIB funded the “Meeting State Demand: A Report on the Labor Market Outcomes for Montana Colleges” report and closely reviewed its findings. This report was a joint effort between the Montana Department of Labor & Industry (DLI), the Office of the Commissioner of Higher Education (OCHE), and the Montana Department of Revenue. These workforce development activities are now reflected in Montana’s combined WIOA–Perkins State Plan, ensuring that Perkins CTE programs, WIOA training investments, and Adult Education services are coordinated under the 406 JOBS framework rather than operating as separate programs.

The first report was published in 2017 to look at how colleges are aligned with state economic needs. Since the report’s initial release, an updated report was issued in October of 2022. The Montana Department of Labor & Industry and the Office of the Commissioner of Higher Education have continued to collaborate on workforce alignment and opportunity within Montana’s higher education system.

The Partner Agencies will collaborate with partners at the Department of Labor and Industry, the Governor’s Office, the Montana Chamber of Commerce, and other interested parties to identify and define credentials of value and create a plan to track credential attainment across the state.

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

Because of the tight labor market in Montana, employer engagement between education and workforce programs continues to grow as more employers are seeking innovative ways to meet their worker challenges. Work-based learning (WBL) models and integration of WBL into CTE programs across the state allows educators, students, and employers to engage and learn on job

sites as well as in the classroom. To maintain that development, Montana will continue to provide guidance for educators and employers on WBL models and design meaningful experiences for students and adult learners. Growth in this area encourages meaningful coordination between programs at the state and local level. The progress made in Montana work-based learning programs is, in large part, due to the collaboration between OPI, OCHE, DLI, and private industry.

In August 2020, a non-profit organization called Reach Higher launched the Work-Based Learning Collaborative, which is a cross-section of public and private sector organizations with a stake in work-based learning, determined to work together to find a better way to ensure Montana students, educators, and businesses are supported by high-quality, accessible, relevant, and measurable work-based learning opportunities. The Office of the Commissioner of Higher Education and the Office of Public Instruction are partners, along with other State agencies, labor organizations, non-profit organizations, and private partners. Some of the work and activities that have been accomplished include a teacher externship program, work-based learning toolkits for students, teachers, and business partners, and guidance on state policies and laws related to work-based learning in Montana.

Within the postsecondary system, work-based learning is recognized as a priority area for postsecondary LEAs in both the Local Application and Reserve Fund. To encourage the expansion of Work-Based Learning opportunities at the secondary level, OCHE will provide postsecondary LEAs technical assistance related to:

- CTE programs use workforce data provided by the MDLI Perkins dashboard related to wages, in-demand occupations, growing industries, and other information to help identify opportunities for WBL activities.
- Perkins grant coordinators working with CTE instructors to identify programs where WBL experiences may augment curriculum.
- Perkins grant coordinators working with campus enrollment and advising departments to ensure WBL learning opportunities are embedded into academic and career advising.
- CTE instructors offer professional development on how to connect classroom instruction and activities with embedded workplace skills, duties and responsibilities (employability skills).
- Stakeholders outside of educational institutions engaging in WBL initiatives beginning with the CLNA process. Input will be gathered on all aspects of Work Based Learning.

The Montana Department of Labor & Industry (DLI) worked with the Office of Public Instruction (OPI) and the Office of the Commissioner of Higher Education (OCHE) to develop a dashboard to help Perkins-receiving institutions align career and technical education (CTE) programs to regional workforce demand. This dashboard was a direct response to the Perkins V Comprehensive Local Needs Assessment and requirements for CTE program design. In addition, the dashboard is external-facing and will also assist WIOA service providers working with clients in career exploration and training.

Additionally, the Office of Public Instruction operates Montana Ready, which is an initiative for K-12 schools to expand industry, military, and postsecondary partnerships. The emphasis is on building a stronger STEM/CTE focus beginning with middle school. Through this collaboration, the OPI

seeks to increase opportunities for students engaged in personalized learning and skills development that support them in the workforce or college immediately after they graduate. Some examples of these include dual enrollment, work-based learning, internships, Advanced Placement, computer science, CTE coursework, JROTC, credentialing, etc.

During the 2023 legislative session the Montana legislature provided more funding for Advanced Opportunity through HB 257. Advanced Opportunities provides additional funds to secondary schools to expand personalized career and technical education opportunities for middle and high school students and reduces out of pocket expenses for families in support of a student's postsecondary education success. This program, combined with transformational learning, is defined as a flexible system of pupil-centered learning, and this bill incentivizes schools to create programs that honors student's individual interests, strengths, and needs, and actively engages students in determining what, how, when and where they learn. It also allows students to take advantage of experiential learning opportunities in and outside of the classroom. The Partner Agencies will also support AI literacy and AI-related credential opportunities in CTE programs, in alignment with the combined WIOA-Perkins State Plan's emphasis on AI readiness and industry-recognized credentials of value identified through the statewide credential registry.

Montana legislature also increased funding for Montana's seven Career and Technical Student Organizations through HB 382. Providing an increase to assist with state level activities that promote career exploration, student leadership, workforce experience, expand opportunities to students in rural areas. This funding will be used to help students increase their skills for workforce credential attainment, dual enrollment, internships, pre-apprenticeships, and work-based learning opportunities.

B.1.B. STRATEGIC VISION

Montana's Career and Technical Education Mission Statement: Montana will implement Career and Technical Education to prepare educated, highly skilled and motivated individuals through pathway transitions and collaborative partnerships to meet workforce needs.

Montana's Career and Technical Education Strategic Vision: Montana's CTE programs will create opportunities for all students to become educated, highly skilled, and well-rounded individuals who can meet the economic and workforce needs of our state.

Based on information gathered during Montana's stakeholder engagement process as well as information discussed during the Perkins Advisory Committee meetings, Montana established four (4) goals for preparing an educated and skilled workforce.

1. The Partner Agencies will work with local eligible agencies to ensure every student in Montana has access to quality career and technical education.
2. The Partner Agencies will align career and technical education programs at the secondary and postsecondary levels so that students who transition with a CTE pathway will be prepared to succeed.
3. State-level postsecondary and secondary staff will engage business and industry leaders throughout each grant cycle to ensure the career and technical education programs are effective in preparing a skilled workforce.
4. State-level postsecondary and secondary staff will expand access to, and ensure the

quality of, work-based learning opportunities and early college access to all secondary students in Montana.

These CTE goals are embedded in the combined WIOA–Perkins State Plan and the 406 JOBS framework, which organize all partners around four pathways to work, zero barriers to employment, and six high demand sectors. Beginning with this combined plan submission, OCHE and OPI will use shared sector strategies, common labor market tools, and, where allowable, aligned performance measures with WIOA to ensure CTE programs of study and WIOA funded training support the same high demand career pathways.

Montana plans to meet these goals with several strategies. Key strategies include:

- The Office of the Commissioner of Higher Education and the Office of Public Instruction commit to partnering with various State agencies, industry associations, and both public and private stakeholders to increase collaboration and increase the effectiveness of CTE programs. School CTE advisory boards, career exploration partnerships, engagement through the Comprehensive Local Needs Assessment, and assessment of credential value are all significant ways OCHE, OPI and local schools engage with business and industry partners to promote and communicate CTE pathways.
- The Office of the Commissioner of Higher Education and the Office of Public Instruction will continue to engage and participate with the Work-Based Learning Collaborative, a cross-section of public and private sector organizations with a stake in work-based learning, to enhance access to and the quality of work-based learning opportunities for Montana students.
- OCHE and OPI will continue to invest in innovative practices and technology that expands access to quality CTE for every student in Montana, supporting programs that provide both synchronous and asynchronous distance learning options, as well as hybrid learning models. Programs that offer place-based learning with local partners benefit students and local economies.
- OCHE and OPI will also expand partnerships between secondary and postsecondary programs, encouraging more collaboration where possible and providing appropriate technical assistance to do so. We are committed to breaking down silos and sharing resources and opportunities between institutions that are regionally connected.

The Partner Agencies will continue to promote Montana Career Pathways, so students are aware of secondary CTE programs and activities, as well as options for postsecondary degrees and credentials that align to their pathway.

B.1.C. JOINT PLANNING AND ALIGNMENT

As described in Section B.1.a, the online dashboard developed by DLI was one of the first projects designed for secondary, postsecondary, and WIOA service providers to address workforce alignment.

The Montana Department of Labor and Industry (DLI) economists and the Montana State Workforce Innovation Board (SWIB) continue to play a significant role in informing the direction of career and technical education in the state. The Montana DLI supports and maintains the “Montana

Career Information System” (MCIS), an online portal for middle, high school, and adult learners to explore and learn about potential career options in the state. MCIS allows students to review occupation matches, training, and education opportunities and employment options based on their interests. The information provided by DLI through MCIS is referenced in each Montana Career Pathway and is reviewed yearly for updates and accuracy.

Further evidence of joint planning and alignment culminated in the SWIB funded “Meeting State Demand: A Report on the Labor Market Outcomes for Montana Colleges”.

In addition, the SWIB supported the submission of a waiver allowing Montana’s University System to become eligible to receive WIOA funds and provide training through the Eligible Training Provider List (ETPL). The board receives regular updates on the implementation of Perkins V and Perkins V planning at its meetings and is committed to promoting CTE and work- based learning.

As of the PY 2026–2027 modification, Montana’s CTE and workforce partners are operating under a single combined WIOA–Perkins State Plan. SWIB and the 406 JOBS workplan provide the structure for joint planning across OCHE, OPI, WIOA core programs, Adult Education, VRBS, TANF/SNAP E&T, Registered Apprenticeship, and other partners, aligning referral processes, co-enrollment, and use of shared labor market and credential tools.

B.1.D. STATE LEADERSHIP FUNDS

Individuals in State Institutions

Montana allows for up to .2 percent of the Perkins state leadership allocation to be made available to agencies, organizations, or institutions serving individuals in state correctional facilities. Funds are awarded through a competitive grant process.

Nontraditional Training and Employment

To support nontraditional training and employment services under section 112(a)(2)(B), \$60,000 will be available. Funds may be used at the state level to provide professional development to secondary and postsecondary teachers, faculty, and staff, as well as state level CTE staff who work with CTE programs that serve gender nontraditional students. Funds may also be used for materials promoting nontraditional programs and grants for campus activities dedicated to recruitment of gender nontraditional students.

Support for CTE Teachers, Faculty, Staff and Technical Assistance

Leadership funds will be used for salaries of staff that provide professional development and technical assistance to CTE teachers and Montana’s Perkins LEAs faculty and staff.

Remaining Funds

After accounting for leadership funds expended for the categories above, the remaining state leadership funds will be allocated as follows: 50 percent for secondary (OPI) and 50 percent postsecondary (OCHE). These funds will be used for the remaining required uses of funds and appropriate permissible uses of funds.

B.2. IMPLEMENTING CAREER AND TECHNICAL EDUCATION PROGRAMS AND PROGRAMS OF STUDY

B.2.A. CTE PROGRAMS OF STUDY AT THE STATE LEVEL

The Partner Agencies have collaboratively developed career and technical programs of study that are aligned with Montana-specific program concentration areas. The programs of study are named ***Montana Career Pathways***.

The statutory definition of a program of study is a coordinated, non-duplicative sequence of academic and technical courses that include secondary and postsecondary level content and incorporate challenging academic standards; addresses academic and technical knowledge and skills, including employability skills; is aligned with the needs of industry; progresses in specificity; has multiple entry and exit points that incorporate credentialing; and culminates in the attainment of a recognized postsecondary credential.

Created in 2002 and modernized in 2024, the National Career Clusters Framework has provided a shared structure and language for CTE program design across the United States. The modernized Career Clusters Framework is designed to serve as a bridge between education and work and a central building block for consistently designed and high-quality CTE programs.

Montana Career Pathways are provided as templates for secondary guidance on course sequencing that progress in specificity, including dual enrollment options in the specific pathway to provide students with transitional credits in their chosen postsecondary pathway. Montana Career Pathways include career guidance, work-based learning, and specific industry credentials of value in certain pathway sectors, as validated by business and industry. Each pathway addresses both academic and technical knowledge and skills and includes employability skills – professional development is provided to teachers and faculty to specifically address the inclusion of employability skills in CTE classes and programs. Once a student progresses from secondary to postsecondary, Montana Career Pathways include multiple entry and exit points and include stackable degrees/credentials.

The Montana Career Pathways website is located on both the MUS website and the OPI website (<http://www.mus.edu/mcp>); (<http://opi.mt.gov/Educators/Teaching-Learning/Career-Technical-Education-CTE/About-Montana-Career-Pathways>). These resources were developed for students, parents, teachers, and faculty to provide information about career pathway options.

Montana Career Pathways are specific to the program area and have direct links to the Montana Department of Labor & Industry's Employment Growth research.

Montana has adopted the following Career Cluster areas and Statewide Career Pathways:

- Agricultural Education
 - Agribusiness
 - Agriculture Technology & Automation
 - Animal Science
 - Food Science & Processing
 - Plant Systems
 - Energy & Utilities – AgEd

- Conservation & Land Management
- Art Entertainment & Design Education
 - Fine & Performing Arts
 - Design & Digital Arts (Cross-cutting with Business & Marketing)
 - Fashion, Textiles & Interiors (Cross-cutting with Family & Consumer Sciences)
- Business & Marketing Education
 - Accounting
 - Banking & Financial Strategy
 - Data & Computer Science
 - IT, Networking & Cybersecurity
 - Management & Entrepreneurship
 - Marketing & Sales
 - Design & Digital Arts (Cross-cutting with Arts Entertainment & Design)
- Family & Consumer Sciences Education
 - Fashion, Textiles & Interiors (Cross-cutting with Arts Entertainment & Design)
 - Early Childhood Care & Education
 - Teaching & Training
 - Culinary & Food Services
 - Travel & Event Management
 - Human & Community Services
- Health & Public Safety Education
 - Allied Health Professions
 - Biotechnology Research & Health Administration
 - Emergency Response
 - Military & National Security
 - Montana Tribal Leadership & Government
- Industrial Technology Education
 - Skills Trades: Construction & Heavy Equipment
 - Skills Trades: Welding & Fabrication
 - Skilled Trades: HVAC & Electrical

- Engineering & Advanced Manufacturing
- Automotive Maintenance & Repair
- Air, Space, Ground & Marine Transportation
- Energy & Utilities - ITE

OPI developed a series of templates that explain how to select rigorous course options at the local secondary level, for each of the approved Montana Career Pathways. An example of a Montana Career Pathway template is attached as Appendix C. OPI also allows locally approved pathways if smaller schools need to substitute foundation or elective courses within a given pathway. The Partner Agencies will review these pathways annually along with the Statewide pathways.

OPI CTE Specialists annually review all CTE courses taught in secondary CTE programs and verify teacher licensure, foundation, and upper-level courses, and use this information to develop an approval template for each school/program area. These templates are electronically sent back to the CTE teacher to verify and add any additional information pertaining to their pathway.

The Partner Agencies will use the statewide credential registry developed under the STARS Act, together with WIOA Eligible Training Provider List processes, to identify and prioritize credentials of value within each Montana Career Pathway for both CTE students and WIOA participants.

B.2.B. APPROVING LOCALLY DEVELOPED CAREER PATHWAYS

B.2.B.I. ACADEMIC ACHIEVEMENT AND TECHNICAL SKILL ATTAINMENT

The Office of Public Instruction collects coursework information at the secondary level through OPI's education administrative management database. Each school reports course codes, instructor, class length, and student enrollment for each course. The data is then disaggregated by the CTE program area. Each program specialist reviews coursework to determine:

- if the program is offering one credit (1 year) of foundational coursework for their specific program area;
- if a second credit (1 year) is offered in their specific program area;
- whether work-based learning is embedded in the curriculum; and
- if the school offers dual credit options in specific program areas.

Individual teachers/schools receive a copy of the Pathway Approval Form with guidance for core/academic coursework required for graduation.

All eligible schools must verify that special populations have access to all program areas offered in their school. The OPI collects Performance and Accountability data during the reporting process.

The Office of the Commissioner of Higher Education also continues to work with two-year colleges on a program prioritization initiative that requires review of currently offered programs to evaluate their relevance, quality, productivity, and efficiency. Through this process, Montana postsecondary institutions can determine each program's alignment with workforce needs and academic rigor.

B.2.B.II. EXPANDING ACCESS TO CTE FOR SPECIAL POPULATIONS

Each local education agency (LEA) is required to address how activities expand access to CTE for special populations. The Partner Agencies will offer statewide professional development to provide secondary and postsecondary CTE educators tools to better serve special populations in Montana. The Partner Agencies' goal is to expand the focus on each special population category as defined by the Strengthening Career and Technical Education for the 21st Century Act.

The Partner Agencies recognize the intersection of all special population designations and the need to provide a wide variety of supports for these students based on a multitude of needs.

Within OPI, the state homeless coordinator, state foster care point of contact, students with disabilities staff, Title III (EL), and the division of career, technical and adult education reviews disaggregated CTE data, share project updates, and plan additional technical assistance for LEAs continuously during the year. Perkins local allocations continue to provide support for low socio-economic CTE students to ensure barriers are removed for participation. Montana's Advanced Opportunities Grant expands personalized career and technical education opportunities for middle and high school students. The grant reduces out-of-pocket costs for students and families in support of a student's postsecondary success. Advanced Opportunities Grant empowers students to actively engage in forming postsecondary success that aligns with their individual interests, passions, strengths, needs and culture and authorizes elected school boards to use advanced opportunity aid to invest in Montana students by supporting individualized pathways for career and postsecondary.

Most secondary schools in Montana are rural and, by necessity, all special populations are mainstreamed into all courses, including CTE. Individuals preparing for non-traditional employment continue to be assessed annually as one of our Perkins performance indicators.

Emphasis has been on gender equity in non-traditional participation and concentrators and the state only missed this indicator during one school year. The CTE Division of OPI then offered technical assistance to all schools by contracting an expert in gender equity through the National Alliance for Partnerships in Equity.

Pregnant & parenting single parents, by virtue of the small number of students in this category, are provided individualized assistance through their LEA. Larger school districts and postsecondary institutions incorporate early childhood learning centers that benefit parenting students. It is also common practice for postsecondary institutions to provide free childcare for single parent students receiving tutoring that is specific to their CTE program. The Partner Agencies support and encourage these practices.

Perkins funding, in conjunction with special education funding, expands access to adaptive services to students with disabilities so they may participate in secondary and postsecondary.

CTE programs. Montana's larger school districts also hire paraprofessionals to work specifically in CTE classrooms to assist students with disabilities.

The OPI identifies languages other than English spoken by students through the Home Language Survey (HLS). The data show German, Spanish and native languages from various tribes across the state are spoken.

The McKinney-Vento sub-grant specifically requires collaboration between LEA homeless programs and CTE programs in the state. These funds are used for CTE and CTSO activities for homeless

youth and students in foster care, such as lab fees, work-related clothing needs or tools, and CTSO participation fees. New strategies to assist this special population group and being employed by homeless liaisons within several schools to provide career exploration and personal introductions to chapter advisors for CTSO inclusion.

B.2.B.III. SUPPORTING THE INCLUSION OF EMPLOYABILITY SKILLS

The Office of Public Instruction began the process of career and technical education content standards revisions during Summer 2019. The process began with thirty (30) CTE teachers developing the framework for a comprehensive approach to CTE content. The proposed CTE content standards reference employability skills throughout the curriculum for grades K-12. The new standards were adopted November 5, 2020, and became effective July 1, 2021.

CTE Specialists worked with workforce development partners to identify essential employability skills. These skills will be embedded in all foundational CTE courses in all program areas. To ensure that all students are exposed to these skills, student work-based learning projects include a scoring rubric for demonstrating employability skills. Lesson plans will be developed and disseminated to all CTE teachers for the following skills:

- Attendance and punctuality
- Motivation and initiative
- Communication
- Critical thinking and problem solving
- Workplace policy, culture, and safety

In conjunction with partner agencies and the statewide Work-Based Learning Collaborative the Office of Public Instruction has posted a [Work-Based Learning Manual](#) to deliver consistent statewide messaging and provide resources for educators, employers, students and parents. This online manual is revised at least annually as updates occur.

Postsecondary LEA's focus on the inclusion of employability skills and resume building within existing programs.

B.2.C.I. AVAILABILITY OF CAREER PATHWAYS INFORMATION

As previously noted, the Montana Career Pathways website provides information to students, parents, teachers and faculty to provide information on career pathway options. These sites include course recommendations, student organization involvement, work-based learning options, dual enrollment recommendations and academic courses required for graduation.

The Office of the Commissioner of Higher Education created a series of videos highlighting CTE careers and programs across Montana. These videos will be posted to the MUS website, social media channels, and available to all LEAs.

The Partner Agencies provide information about Montana Career Pathways through presentations/panels/exhibits at state professional development events, including Montana Association of Career and Technical Education, Montana School Counselors Association, Montana College Access Network, and Montana Postsecondary Education Opportunities Council. OPI CTE

program specialists also hold training throughout the year with their teachers and OCHE facilitates bi-annual technical assistance training with local Perkins coordinators and Reserve grant coordinators.

B.2.C.II. COLLABORATION IN DEVELOPMENT AND COORDINATION OF CAREER PATHWAYS

All secondary and postsecondary schools in Montana were included during the development and implementation of Montana Career Pathways. Bi-annual technical assistance training was utilized as a time for LEA's to review and approve the components of each career pathway. Recipients of the Reserve Grant were also heavily involved in the roll-out of the new Pathways program.

Secondary and postsecondary teachers, administrators, and counselors will continue to be important partners in the development and coordination of Montana Career Pathways each year during the review process.

Faculty and staff at Montana's postsecondary campuses work to include multiple entry and exit points for all CTE programs of study by including built in and stackable industry recognized credentials. Several of our campuses are currently working to 'package' sets of credentials that can be built and translated into credits that lead to associate and bachelor's degrees.

B.2.C.III. LABOR MARKET DATA AND ALIGNMENT OF PROGRAMS OF STUDY

The Montana Department of Labor and Industry (DLI) economists and the Montana State Workforce Innovation Board continue to play a large role in informing the direction of career and technical education in the state. The Montana DLI supports and maintains the "Montana Career Information System" (MCIS). The information provided by DLI through MCIS is referenced in each Montana Career Pathway and is reviewed each year for updates and accuracy.

The Partner Agencies frequently reference DLI's labor market information (lmi.mt.gov) to inform decisions on Montana Career Pathways and activities proposed by eligible recipients, including current employment statistics, job projections, and Montana economy reports. The Montana DLI also periodically publishes reports on Registered Apprenticeship program data, labor market outcomes of Montana colleges and the ability to meet state worker demand, and a statewide college workforce report. This information is readily available to all eligible recipients and reviewed to ensure the alignment of programs of study and the needs of Montana's economy.

B.2.C.IV. EQUAL ACCESS FOR SPECIAL POPULATIONS

The Strengthening Career and Technical Education for the 21st Century Act identifies the following students as "special populations":

- Individuals with disabilities
- Individuals from economically disadvantaged families, including low-income youth and adults
- Individuals preparing for non-traditional fields
- Single parents, including pregnant women
- Out-of-workforce individuals

- English learners
- Homeless individuals
- Youth who are in, or have aged out of, the foster care system
- Youth with a parent who is a member of the armed forces and is on active duty

It is essential for students in special populations to have a well-defined personal plan for reaching his or her goals for high school graduation and further education and/or employment beyond high school. Montana Career Pathways available to secondary students and postsecondary students identify several options in postsecondary education for high-skill, high-wage, and in-demand employment for students. Montana Career Pathways serves as a guide, along with other career planning materials, to help the student choose the appropriate academic, CTE and dual enrollment classes that are required for high school graduation and further advancement in their chosen pathway.

For students with disabilities who participate in CTE programs, federal statute requires that students receive the full range of supplemental services to help them succeed educationally and in making successful transitions to further education and employment after completing their public education. At the local level, students with disabilities have an Individualized Education Program (IEP) developed by the IEP team.

The IDEA requires that, by age 16, the IEP addresses the student's postsecondary goals based upon age-appropriate transition assessments related to training, education, employment and independent living skills, where appropriate, and transition service needs including courses of study. The OPI requires that the transition plan be in place by the time the student is age 15, or earlier if appropriate. IEP teams are encouraged to consider the student's desired post-school activities at younger ages to facilitate the student's participation in courses that are aligned to those post-school desires as soon as possible.

All the secondary school systems offer supportive services to assist students with disabilities if those services are determined to be necessary in the child's IEP. Montana school districts normally consist of only one secondary school (only four of our high school districts have more than one high school); therefore, the disparity of supplemental services between schools in the same district is typically not an issue.

Based on the FFY22 Annual Performance Report (APR), 56.10% of students with disabilities, on an IEP age 5 and enrolled in kindergarten and 6-21, are inside the regular classroom 80% or more of the day. Of the population of students with disabilities on an IEP age 5 and enrolled in kindergarten and 6-21, only 1.08% are in separate schools, residential facilities, or homebound/hospital placements.

The State also offers English Learner and migrant education program services through the OPI. Local districts requiring assistance with these special populations are provided training and materials to meet individual student needs.

The Partner Agencies will provide leadership to assist school districts and two-year postsecondary institutions to gather and share information about strategies for special populations that show promising outcomes and can be implemented with reasonable costs.

Montana also considers students located in frontier/rural areas of our state as a special population. Due to the large number of rural/frontier schools in the state, CTE courses have been developed for the Montana Digital Academy. This allows students to explore career options that may not be available within their classroom. Currently there are courses CTE available in Agriculture Science, Business and Technical Education, Family and Consumer Sciences, Health Sciences and Teachers Education. Other CTE course providers include the Montana Health Network that offers a hybrid Certified Nursing Assistant course in eastern Montana. They also facilitate course high school students to take advantage of Safe Sitter, Basic Life Support, and Advanced Life Support.

The OPI also partners with GearUp, ETS, local non-profits, and two-year colleges to offer summer camp/event options that bring students from rural/frontier communities to explore career options.

Each LEA is required to address the ways in which it will provide activities that expand access to CTE for special populations. The Partner Agencies offered a statewide joint professional development opportunity to provide both secondary and postsecondary CTE educators information about better serving special populations in Montana. Currently, the emphasis on CTE program access to special populations has been focused on gender and nontraditional students. The State's goal is to expand the focus to include each special population category as defined by the Strengthening Career and Technical Education for the 21st Century Act.

Many secondary and postsecondary LEA's have utilized Perkins funding to expand access to adaptive services to students with disabilities, so they may participate in CTE courses that they otherwise may not have had access to. This continues to be an activity that is supported and encouraged by the State.

For postsecondary LEAs, OCHE will be responsible for providing guidance and monitoring of efforts to address any equity gaps through the following strategies:

- Providing data and data analysis to LEAs to identify levels of program access and any access gaps;
- Providing guidance on state-wide strategies to ensure equity in access and participation to special populations;
- Ensuring CTE programs of study that request Perkins funding are serving special populations;
- Reviewing CTE programs of study seeking funding to ensure they have policies in place to encourage equity for special populations;
- Reviewing policies on transitions for special populations from secondary to postsecondary education;
- Work closely with school and college staff working specifically with the special populations to provide technical assistance and professional development related to the findings of the Comprehensive Local Needs Assessment and best practices in implementation of nondiscrimination strategies.

In addition, LEAs seeking funding must provide evidence that all CTE opportunities are offered regardless of race, color, national origin, sex, disability, or based on status as a member of a special

population. This requirement will be met if the CTE program can demonstrate that:

- A nondiscrimination notice and nondiscrimination policies and procedures will be publicly available and posted on the LEA's websites and public materials;
- CTE program offerings and admission criteria, including accommodations made for special populations, will be made publicly available on websites and public materials;
- For each LEA, the name and/or title, office address, and phone number of persons designated to coordinate compliance under Title IX and Section 504 are required to be publicly available.

To ensure compliance, OCHE will review LEA websites during the Local Application process and will conduct regular desk audits and on-site reviews to ensure that nondiscrimination policies and procedures are up-to-date and being followed.

B.2.C.V. COORDINATION WITH THE STATE WORKFORCE INNOVATION BOARD

The State of Montana coordinates workforce, secondary and postsecondary education systems across the state to best serve Montanans. Programmatic alignment is required under both Perkins and WIOA guidance.

The Montana State Workforce Innovation Board (SWIB) supports coordination between the upcoming WIOA and Perkins plans outlining the strategic vision for CTE and workforce development in Montana. The collaboration on these plans will provide the Montana Department of Labor & Industry, the Office of the Commissioner of Higher Education, and the Office of Public Instruction the opportunity to better understand programs and the landscape of both workforce development and education throughout the state.

The SWIB continues to support and require meaningful coordination of services with education partners to ensure Montana has a well-trained workforce and continues to grow economically. As previously noted, the SWIB funded the "Meeting State Demand: A Report on the Labor Market Outcomes for Montana Colleges" report and closely reviewed its findings.

In addition, the SWIB supported the submission of a waiver allowing Montana's University System to become eligible to receive WIOA funds and provide training through the Eligible Training Provider List (ETPL). The board receives regular updates on the implementation of Perkins V and Perkins V planning at its meetings and is committed to promoting CTE and work-based learning.

Through the combined WIOA-Perkins State Plan, SWIB uses the 406 JOBS framework and sector partnerships to coordinate employer engagement across CTE and WIOA, ensuring that dual enrollment, work-based learning, and Registered Apprenticeship expansions reflect shared sector priorities.

B.2.C.VI. SECONDARY, POSTSECONDARY AND INDUSTRY COLLABORATION

The Partner Agencies frequently reference DLI's labor market information (lmi.mt.gov) to inform decisions on Montana Career Pathways and activities proposed by eligible recipients, including current employment statistics, job projections, and Montana economy reports. The Montana DLI

also periodically publishes reports on Registered Apprenticeship program data, labor market outcomes of Montana colleges and the ability to meet state worker demand, and a statewide college workforce report. This information is readily available to all eligible recipients and reviewed to ensure the alignment of programs of study and the needs of Montana's economy.

All eligible recipients must have Advisory Committees for their CTE program areas to receive funding. This is monitored in person during monitoring visits in addition to requiring committee minutes to be submitted and approved. Each year, OPI conducts a New CTE Professionals Workshop Series for the express purpose of technical assistance with setting up and maintaining advisory committees, work-based learning options, professional development, student organizations and dual enrollment. This is a hybrid series that consists of two virtual sessions in September and October, an in-person session in October and one virtual follow up session in November. This is targeted for CTE professionals who are new to the CTE classroom or new to Montana.

OCHE offers multiple opportunities each year for technical assistance training for postsecondary eligible recipients to work with the program specialists from the OPI on topics specific to work-based learning and industry involvement. There have also been many sessions during these trainings that have included local industry members to take part in valuable discussions that have led to innovation in Montana's secondary and postsecondary programs and pathways.

Recipients of the Reserve Grant employ grant coordinators who act as liaisons for program offerings at their postsecondary institution. Coordinators work with secondary students in Montana who may be interested in a pathway related to a career in a program they offer. Funds provided via the Reserve grant are often used to coordinate activities and events that connect secondary and postsecondary students, teachers, administrators, and counselors to local industry partners in ways that provide hands-on, meaningful experiences to all attendees.

B.2.C.VII. IMPROVING OUTCOMES AND REDUCING PERFORMANCE GAPS FOR SPECIAL POPULATION CTE CONCENTRATORS

The ability to disaggregate the number of students concentrating in each pathway based on Perkins special populations provides a better understanding of any performance gaps that may be present and establishing improvement plans as needed. Dual enrollment participation will further identify students within a pathway who may be transitioning to postsecondary pathways. This will allow the partner agencies to share data for the purposes of CTE student success. The OPI process for determining intensive and rigorous support schools will also be used by the CTE Specialists to determine targeted technical assistance. This strategy will also be used to further analyze disparities for CTE concentrators with the goal of individualized planning.

The state homeless youth coordinators, state foster care point of contact, students with disabilities staff, Title III (EL), Title I, and CTAE will meet twice yearly to review disaggregated data, share topic updates, and will plan additional technical assistance to develop guidance for the upcoming grant year.

Each postsecondary LEA will need to address how they plan to serve special populations and address any performance gaps that exist, which will be provided to them through a Perkins performance report card each year.

B.2.D. DUAL ENROLLMENT PROGRAMS

The Montana University System operates the One-Two-Free dual enrollment program, offering two dual enrollment courses through MUS colleges for free. This program was created to increase access to higher education for high school students, reduce education costs for Montana families, and enhance student success.

The Office of the Commissioner of Higher Education annually increases the number of students taking dual credit courses as the program is a priority for the agency. Dual enrollment opportunities for students within a CTE program of study are now required for LEAs applying for Perkins funds.

Scholarships are available for students who demonstrate need and pursue dual enrollment beyond six credits. Montana has seen an impressive 16.4% enrollment growth per year.

The Partner Agencies provide technical support to teachers to facilitate coordination between secondary and postsecondary institutions to ensure courses are taught to the standards set by the colleges.

Job Service offices, Adult Education, and WIOA Title I partners will work with OCHE and OPI to promote dual credit CTE courses and work-based learning in the six high-demand sectors as preferred options within combined WIOA-Perkins career pathways.”

B.2.E. INVOLVING STAKEHOLDERS IN THE EVALUATION OF CAREER AND TECHNICAL EDUCATION PROGRAMS

The State of Montana is committed to maintaining a consultative and cooperative environment for the development, implementation and evaluation of quality career and technical education programs.

Each LEA receiving Perkins funding is responsible for the development of an advisory committee. LEAs must submit advisory committee meeting minutes and a list of the individuals and businesses on their committee(s) when Perkins applications are reviewed each year. The local application process for Perkins funds requires all eligible institutions to actively involve students, parents, teachers, local business, and labor organizations in the planning, development, implementation, and evaluation of career and technical education programs. The Partner Agencies have been participating in the Montana School Counselors Association annual conference each year by offering a CTE track that highlights a different Montana Career Pathway each year. Other strategies for involving school counselors have been to assist in paying for school counselors to attend a National ACTE conference to immerse them in career pathways options. The Partner Agencies plan to continue this practice to inform and include high school counselors.

Tribal consultation will continue with the eight reservations in the state. Native American students represent sixteen percent (16%) of the total public-school population in Montana. CTE enrollment for tribal schools is ninety-six (96%) percent of students in grades 9-12 at thirty-three high schools on reservations. Thirty-one of these schools have at least one Montana Career Pathway. Access and equity to CTE programs are especially prevalent for this population and the Partner Agencies will continue to work with tribes to ensure options are available for native communities.

B.2.F. LOCAL APPLICATION TEMPLATE

Montana's Postsecondary Local Application requires LEAs to articulate three different areas when applying for local funds.

1. Perkins V required questions including strategies for:
 - a. Collaborating with local workforce partners to provide career exploration/guidance activities;
 - b. Improving academic and technical skills of students participating in CTE programs;
 - c. Providing activities to prepare special populations for high-skill, high-wage, or in-demand occupations; prepare CTE participants for non-traditional fields; provide equal access for special populations to CTE courses, programs, and programs of study; and ensure that members of special populations will not be discriminated against;
 - d. Providing work-based learning opportunities
 - e. Providing dual enrollment opportunities;
 - f. Supporting the recruitment, preparation, retention, and training, including professional development, of teachers, faculty, administrators, and specialized instructional support personnel;
 - g. Addressing disparities or gaps in performance between groups of students in each of the plan years, and if no meaningful progress has been achieved prior to the third program year, a description of the additional actions that will be taken to eliminate these disparities or gaps.
2. Identifying how results of the CLNA that justify requested expenditures;
3. A detailed budget of expenditures.

B.2.G. COMPREHENSIVE LOCAL NEEDS ASSESSMENT TEMPLATE

The Partner Agencies collaborated to develop the Comprehensive Local Needs Assessment guidance to be used by LEAs statewide. This document provides a mechanism with which LEAs can capture the results of their CLNA for the purposes of justifying expense requests in the local application process and contains detailed technical assistance on structuring the local needs assessment process and engaging stakeholders.

The CLNA guide provides LEAs a framework to structure their approach to the local needs assessment efforts by translating the legal language from the Perkins V law into actionable steps that complete the requirements and engage stakeholders in thoughtful program improvement.

This document was created with resources from Advance CTE and Association of Career Technical Education (ACTE).

The guide assists LEAs in assimilating statewide data and LMI in a way that allows them to identify strategies for requesting Perkins funding in the local application process. In addition, technical assistance for the CLNA process will be offered annually as part of intensive Perkins workshops and individually as requested by LEAs who need additional assistance in developing their CLNA or interpreting results for local application purposes.

B.2.H. DEFINITION OF “SIZE, SCOPE, AND QUALITY”

Criteria for Size

Secondary eligible recipients must offer a minimum of approved Montana Career Pathways based upon student enrollment as follows:

- Large districts (Class AA) must offer three (3) Montana Career Pathways approved by program specialists.
- Medium districts (Class A/B) must offer two (2) Montana Career Pathways approved by program specialists.
- Small districts (Class C) must offer one (1) Montana Career Pathway approved by a program specialist.

LEAs may offer additional CTE programs beyond the required number of Pathways. If the program meets the requirements of Montana guidelines, it is eligible for Perkins funding.

Postsecondary degree/career programs approved by the Montana Board of Regents or specifically approved by the State are eligible for Perkins funding.

Criteria for Scope

Indications of adequate scope in a Perkins funded secondary CTE program include the requirements for a rigorous Montana Career Pathway (program of study), opportunities for dual credit, online CTE courses, work-based learning, and/or Industry recognized credential opportunities.

Postsecondary programs must include rigorous, coherent CTE content aligned with challenging academic standards culminating in a certificate or degree. Links must exist between the secondary and postsecondary programs of study.

All Perkins funded programs must be aligned with business and industry as validated by a local business advisory committee.

Criteria for Quality

Eligible secondary districts have the minimum number of Montana Career Pathways as determined by their district size, and all CTE funded programs must comply with the Montana CTE requirements and guidelines publication.

Eligible postsecondary recipients offer students the opportunity to participate in programs of study that lead to two of the following three: high-skill, high-wage and/or in-demand occupations. Postsecondary programs must include rigorous, coherent CTE content aligned with challenging academic standards.

Guidance provided to all secondary and postsecondary LEAs on high-skill, high-wage and in-demand are:

- High-skill – requiring a degree or credential in addition to or beyond a high school diploma.

- High-wage – 60% and above the median income per county/city/DLI region/state/etc.
- In demand – the Montana Department of Labor and Industry argues that all industries and careers are currently in demand in Montana.

B.3. MEETING THE NEEDS OF SPECIAL POPULATIONS

B.3.A. PROGRAM STRATEGIES FOR SPECIAL POPULATIONS

Many of the traditional roles and occupations presented to students in special populations have inadequately prepared them for careers enabling them to become economically self-sufficient. Limiting roles and occupations based on gender, race, economic class, disability, or age prevents individuals from achieving their fullest potential. To limit such practices, the Partner Agencies have the responsibility for developing and implementing procedures that encourage and support each student and his or her pursuit of a rewarding career with emphasis on high-skill, high-wage, or in-demand occupations.

B.3.A.I. EQUAL ACCESS

In the local applications, Montana requires eligible institutions to indicate the specific strategies of how they will provide equal access to special populations, including what specific services are available in their institution. Montana refers to all federal and state laws and regulations requiring public institutions to comply with requirements already set in place, such as offices posting notices of equal access to all services in a prominent place.

The Partner Agencies will provide consistent, standardized forms and information, uniform training of staff, appropriate accommodations, and an environment that promotes equal access for all students. The Partner Agencies also coordinate Civil Rights compliance.

B.3.A.II. DISCRIMINATION POLICIES

All postsecondary institutions and secondary schools have nondiscrimination policies in place and procedures for filing complaints. All policies have an appeal process in place.

Notices of nondiscrimination are required in school handbooks and posted in all postsecondary institutions and secondary schools. Monitoring for nondiscrimination is performed through the Office of Civil Rights (OCR) review process and local applications. During monitoring, the OCR process ensures the facilities train staff to perform in a nondiscriminatory manner.

Postsecondary institutions have a uniform system of “self-disclosure” during orientation and strict confidentiality rules ensure students will not be subject to discrimination.

B.3.A.III. SPECIAL POPULATIONS & MEETING STATE DETERMINED LEVELS OF PERFORMANCE

As part of the Comprehensive Local Needs Assessment and Local Application Process, LEAs are required to demonstrate how activities will develop or enhance CTE programs that are designed to enable individuals who are members of special populations to meet or exceed the state determined levels of performance described in section 113. LEAs also must address how programs prepare special populations for further learning and for high-skill, high-wage, or in-demand industry sectors or occupations.

The local application asks LEAs to detail how they will: (1) provide activities to prepare special populations for high-skill, high-wage, or in-demand occupations; (2) prepare CTE participants for non-traditional fields; (3) provide equal access for special populations to CTE courses, and (4) programs, and programs of study; and ensure that members of special populations will not be discriminated against.

In addition, OCHE and OPI will provide monitoring each academic year to assure LEAs are actively working to ensure individuals who are members of special populations are meeting state performance levels. Technical assistance will be provided to LEAs that are not meeting those performance levels or who need additional assistance in recruiting and retaining individuals who are members of special populations. Some examples of strategies used to support special populations in meeting state determined performance levels include:

- identifying and following up with special populations students;
- supporting special populations students with enhanced advisement services, tutoring services, academic and Dual Enrollment advisors, and/or career coaches;
- determining special needs for accommodations so that students can succeed (see B.3.a.iv.);
- providing professional development activities for CTE teachers, counselors, and administrators related to addressing needs of special populations;
- providing special instructional materials as needed.

B.3.A.IV. APPROPRIATE ACCOMMODATIONS

Under the Individuals with Disabilities Education Act (IDEA) and Montana law, students with disabilities are required to be included in regular school curriculum, unless the student's Individualized Education Plan (IEP) team determines needed services and supports cannot be provided in a regular classroom setting. This requirement applies to all school programs and supports the inclusion of students with disabilities in district CTE programs. Adaptive equipment and/or other supportive activities are available for students to meet or exceed performance levels.

The Montana Transition IEP plans transition services around a student's postsecondary goals. Prior to age 16, Montana school districts develop a plan with the student for age-appropriate transition assessments that guide the Transition IEP as required by IDEA. A Transition IEP may include job shadowing, pre-apprenticeship programs, or pre-employment transition services through Vocational Rehabilitation and Blind Services. Within the IEP, accommodations and modifications are developed around the student's needs to allow his/her success. CTE courses and postsecondary goals are included in Montana Transition IEPs and are easily supported by the school districts and communities in Montana.

B.3.A.V. INSTRUCTION AND WORK-BASED LEARNING OPPORTUNITIES

The OPI CTE specialists have ongoing collaboration with the Special Education Division regarding CTE options for student transition plans. The OPI Special Education Division has protocol in place for work-based learning opportunities for students in their programs and utilizes the Work-Based

Learning Manual and resources on the OPI website.

Each LEA will be charged with incorporating work-based learning into their programs of study and will need to offer these opportunities to students to be eligible for Perkins funding. Again, because many of Montana's schools are small and rural, all special populations are incorporated into CTE programs of study and are afforded the same opportunities for work-based learning as all other students. The Partner Agencies see opportunity in working with LEAs on providing professional development that will help CTE teachers, faculty, and staff trained to better serve special populations in many areas, with access to quality work-based learning being one of them.

B.4. PREPARING TEACHERS AND FACULTY

Preparation for Career and Technical Education teachers occurs at Montana State University, University of Montana- Western and Montana State University- Northern. Montana State University, which prepares Agriculture Education, Family & Consumer Sciences, and Technical Education student teachers, has been working on combining CTE majors and minors for more teacher flexibility when seeking employment. With the Technology Education Department joining the Agricultural Education Department, more students are graduating with dual certifications. Montana State University CTE teacher programs collaborated with MSU-Northern, UM-Western and the OPI to host "Teach CTE Day" for high school students considering teaching careers to participate in campus coursework and campus life.

The University of Montana- Western provides a Business Education preparation program and MSU-Northern allows students to be in the field of Industrial Technology with plans to return the program to allow students to complete the program at their campus as well. All three colleges follow the Administrative Rule of Montana 10.58.102 and 10.58.103 for accreditation of Educator Preparation Providers and Accreditation Site Reviews.

Additionally, Montana offers an alternative in its Class 4 Educator License. The requirements are outlined in Administrative Rules of Montana 10.57.420 and 10.57.421. Class 4 licenses are issued to applicants who have worked in the industries relating to the endorsement requested and have field work experience. They are required to submit verification of work experience totaling a minimum of 5,000 hours in the field.

Class 4A is an endorsement for individuals who are already teaching in an academic discipline and are adding a CTE Endorsement.

Class 4B individuals must hold a certificate of completion from an apprenticeship program, or an associate degree, or a bachelor's degree, or a master's degree plus the requisite 5,000 hours of business and/or industry experience. Transcripts are used as part of the evaluation to determine the level of coursework previously taken for prior learning experience.

Class 4C individuals must have a high school diploma plus the requisite 5,000 hours of business and/or industry experience.

OPI specialists will recommend any pre-service training necessary to ensure each new teacher has a thorough understanding of classroom management and assessment. OPI will be using the National Association of Career & Technical Education (ACTE) online bank of courses to fulfill this training. For Trades & Industry and Agricultural Education, pre-service Safety & Liability will be preferred to take place prior to beginning their teaching position and will be required at some point

in time. Montana schools struggle with recruitment and retention of teachers, especially in our rural/frontier communities, which represent many secondary schools in the state. CTE teacher recruitment and retention follows the same pattern as other K-12 teaching positions.

One positive strategy for recruitment has been eliminating burdensome expectations when recruiting CTE teachers from the workforce. Online options for coursework are available through ACTE and the Learning HUB at OPI. Secondly, the CTE Division of the OPI offers ongoing professional development for new CTE teachers, content specific CTE teachers, and collaborative CTE opportunities for cross-sector practice. Several CTE program areas also have mentorship programs in place that link mid/long-term career teachers with new teachers.

Aside from recruitment and retention, it is important to recognize and assist LEAs to increase the number of effective teachers in each school. As articulated in the Montana State ESSA plan, the OPI will monitor and improve equitable access to effective teachers in Title I, Part A schools consistent with ESEA Section 1111(g)(1)(B). The OPI will publicly report the percentage of teachers categorized as “ineffective” by the LEA based on the state definition and consistent with applicable state privacy law and policies.

The OPI has defined these terms as: Ineffective: Montana teachers who are non-licensed or show a pattern of ineffective practices as determined by a local evaluation.

Note: Montana is a local-control state, and evaluations are performed at the local level, therefore, the OPI does not collect data on local teacher evaluations.

Information regarding the above-mentioned categories was gathered and evaluated to determine if low-income and minority students enrolled in schools receiving funds under Title I, Part A, are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers. The OPI verified that low-income and minority students were not served at disproportionate rates.

Postsecondary faculty, staff and administration are recruited and retained according to each college’s policies and guidelines. Perkins funds prioritize professional development opportunities for faculty and staff in CTE programs that receive Perkins funding. Postsecondary LEAs are encouraged to identify funds in their Perkins Local Application for faculty professional development. OCHE will provide technical assistance to postsecondary LEAs regarding identifying and recruiting faculty from business and industry where that need is identified.

C. FISCAL RESPONSIBILITY

C.1. APPROVING ELIGIBLE RECIPIENTS FOR FUNDS

Eligible recipients submit an annual application that includes information gathered from the Comprehensive Local Needs Assessment. In the application process, recipients must describe proposed activities and outline how they fall within the parameters of the allowable use of local funds and are supported by evidence from the CLNA that proposed activities support high-wage, high-skill, and in demand occupations.

Partner Agency staff are responsible for monitoring recipients for compliance with stated budgets and proposed activities, as well as performance measures. Any recipients falling below 90% of the established performance measures are subject to a Performance Improvement Plan.

C.1.A. ACADEMIC ACHIEVEMENT

Eligible recipients must offer CTE programs that include rigorous, coherent CTE content aligned with challenging academic standards. Applications will be reviewed for proposed strategies, activities, and expenditure of funds that promote continuous improvement in academic achievement.

C.1.B. SKILL ATTAINMENT

Eligible recipients are required to provide relevant curriculum at the secondary and postsecondary levels that are aligned with industry standards. Applications will be reviewed for proposed strategies, activities, and expenditure of funds that promote continuous improvement in technical skill attainment.

C.1.C. LOCAL NEEDS ASSESSMENT

The Partner Agencies worked collaboratively to create joint guidance for the Comprehensive Local Needs Assessment (CLNA) for both secondary and postsecondary LEAs. The CLNA guidance closely follows the requirements as outlined in Section 134 of Perkins V, which will then be incorporated into the Local Application. Approval of Local Applications will be determined after ensuring each LEA takes into consideration local economic and education needs as indicated through the CLNA.

All LEAs will be provided a general overview of Labor Market Information and how to use data to drive decision-making for Perkins priority funding. This is integrated into biannual training, monthly Perkins coordinator training calls, and through written guidance in the CLNA template. In addition, the Partner Agencies will provide individualized technical assistance to help LEAs in collecting, disseminating, and analyzing data gathered in the CLNA process on an as-needed basis. As each LEA has different data needs and campus/district infrastructure in place to process local data and conduct analysis, it is likely that technical assistance on this will look different for each specific LEA.

C.2. ALLOTMENT OF FUNDS

C.2.A. SECONDARY AND POSTSECONDARY ALLOCATIONS

Funds received through the allotment made under section 111 will be allocated among secondary and postsecondary Career and Technical Education as follows:

Eighty-five percent (85%) of the funds will be allocated under Section 131 and Section 132. Up to twelve percent (12%) of the eighty-five percent (8.5%) will be used in accordance with Section 112 (c)(Reserve).

Considering the Reserve Funds set aside, the remainder of local funding will be allocated as follows: sixty-five percent (65%) will be allocated to secondary career and technical education and thirty-five percent (35%) will be allocated to postsecondary career and technical education.

This distribution of funds is a result of the consultation between OCHE and OPI, reflecting upon input given by the State Plan Advisory Committee from Perkins IV State Planning, established under Montana Law (MCA 20-7-330).

C.2.B. CONSORTIA

Montana applies the Waiver as described in Section 131(c)(2), that allows the eligible agency to

waive the minimum allocations for a local educational agency that is in a rural, sparsely populated area and demonstrates that they are unable to enter a consortium for purposes of providing jointly beneficial activities.

Although the waiver is utilized so that we may include our small schools, the Partner Agencies have identified several rural/frontier areas that would benefit from a more collaborative approach for building capacity for expanding CTE options for students. State Perkins staff are currently working to finalize guidance and resources to support LEAs who would benefit from joining a consortium. Multiple LEAs in Montana with small allocations should collaborate to best serve the student populations within each consortium by creating new or updating existing CTE programs, establishing innovative delivery methods for courses, expanding work-based learning options, sharing resources such as stakeholder and industry contacts, and/or benefitting from the postsecondary expertise in addressing workforce needs.

C.3. ALLOCATIONS FOR SECONDARY CTE PROGRAMS

OPI shall distribute funds on an annual basis for secondary CTE programs to LEAs according to the following formula, as determined in the Perkins Act:

The total amount allocated for distribution for secondary education CTE (other than the Reserve Fund as noted in Section C.2.) for 2023-2024 is \$3,315,410.

Of this amount:

Seventy percent (70%) of the available funds shall be allocated to LEAs based on the census data for school system enrollment for the number of children in poverty aged 5-17 for the previous school year.

Thirty percent (30%) of the available funds shall be allocated to LEAs based on the AIM enrollment data for the number of children aged 5-17 for the previous school year.

The following table shows secondary eligible recipients and the dollar amounts allocated during the 2023-2024 grant cycle:

LEA Name	Preliminary	SY 2023-2024 Final w/Carryover
Absarokee H S	\$4,064.00	\$4,370.00
Alberton K-12 Schools	\$5,439.00	\$5,848.00
Anaconda H S	\$21,135.00	\$22,724.00
Arlee H S	\$11,388.00	\$12,244.00
Augusta H S	\$3,631.00	\$3,903.00
Bainville K-12 Schools	\$2,798.00	\$3,009.00
Baker K-12 Schools	\$7,643.00	\$8,219.00
Beaverhead County H S	\$21,228.00	\$22,825.00
Belfry K-12 Schools	\$2,196.00	\$2,361.00
Belgrade H S	\$54,982.00	\$59,128.00
Belt H S	\$6,038.00	\$6,493.00
Big Sandy K-12	\$3,581.00	\$0.00
Big Sky School K-12	\$4,506.00	\$0.00

*Bigfork H S	\$18,305.00	\$19,684.00
Billings H S	\$421,473.00	\$453,200.00
Box Elder H S	\$4,373.00	\$0.00
Bozeman H S	\$118,426.00	\$127,358.00
Bridger K-12 Schools	\$3,526.00	\$3,791.00
*Broadview H S	\$0.00	\$0.00
Brockton H S	\$7,528.00	\$8,093.00
Browning H S	\$72,802.00	\$78,273.00
Butte H S	\$122,340.00	\$131,541.00
Carter County H S	\$4,352.00	\$4,680.00
Cascade H S	\$10,095.00	\$10,854.00
Centerville H S	\$0.00	\$0.00
Charlo H S	\$8,595.00	\$9,241.00
Chester-Joplin-Inverness HS	\$7,780.00	\$8,365.00
Chinook H S	\$7,195.00	\$7,737.00
Choteau H S	\$11,241.00	\$12,087.00
Circle H S	\$5,964.00	\$6,412.00
Colstrip H S	\$9,315.00	\$10,017.00
Columbia Falls H S	\$46,184.00	\$49,661.00
*Columbus H S	\$0.00	\$0.00
Conrad H S	\$12,751.00	\$13,710.00
Corvallis K-12 Schools	\$29,894.00	\$32,143.00
Culbertson H S	\$5,211.00	\$5,603.00
Custer County H S	\$32,926.00	\$35,404.00
Custer K-12 Schools	\$1,767.00	\$1,900.00
Cut Bank H S	\$25,799.00	\$27,739.00
Darby K-12 Schools	\$10,412.00	\$11,195.00
Dawson H S	\$27,014.00	\$29,046.00
Denton H S	\$3,047.00	\$3,276.00
Dodson K-12	\$1,785.00	\$1,920.00
Drummond H S	\$3,026.00	\$3,254.00
Dutton/Brady K-12 Schools	\$3,428.00	\$3,685.00
East Helena K-12	\$25,828.00	\$27,774.00
Ennis K-12 Schools	\$6,316.00	\$6,792.00
Fairfield H S	\$6,010.00	\$6,463.00
*Fairview H S	\$0.00	\$0.00
Fergus H S	\$23,333.00	\$25,089.00
Flathead H S	\$183,454.00	\$197,269.00
Florence-Carlton K-12 Schls	\$13,047.00	\$14,031.00
Forsyth H S	\$5,099.00	\$5,483.00
Fort Benton H S	\$4,435.00	\$4,770.00
Frazer H S	\$6,528.00	\$7,018.00
Frenchtown K-12 Schools	\$18,644.00	\$20,048.00
*Froid H S	\$0.00	\$0.00
Fromberg K-12	\$2,741.00	\$2,947.00
Gardiner H S	\$2,511.00	\$2,699.00
*Garfield County H S	\$0.00	\$0.00

Geraldine K-12	\$1,797.00	\$0.00
Geysler K-12 Schools	\$1,437.00	\$1,546.00
Glasgow K-12 Schools	\$13,560.00	\$14,581.00
Grass Range H S	\$1,798.00	\$1,933.00
Great Falls H S	\$266,413.00	\$286,452.00
Hamilton K-12 Schools	\$32,258.00	\$34,685.00
Hardin H S	\$71,006.00	\$76,342.00
Harlem H S	\$19,112.00	\$20,549.00
Harlowton K-12	\$8,270.00	\$8,892.00
*Harrison K-12 Schools	\$2,712.00	\$2,915.00
Havre H S	\$53,193.00	\$57,193.00
Hays-Lodge Pole K-12 Schls	\$13,391.00	\$14,397.00
Heart Butte K-12 Schools	\$0.00	\$0.00
Helena H S	\$153,019.00	\$164,541.00
Highwood K-12	\$0.00	\$0.00
Hinsdale H S	\$1,443.00	\$1,551.00
Hobson K-12 Schools	\$3,524.00	\$3,789.00
Hot Springs K-12	\$6,560.00	\$7,053.00
Huntley Project K-12 Schools	\$16,850.00	\$18,118.00
Hysham K-12 Schools	\$3,150.00	\$3,387.00
Jefferson H S	\$16,626.00	\$17,880.00
Joliet H S	\$6,354.00	\$6,832.00
Judith Gap H S	\$1,497.00	\$1,609.00
Lambert H S	\$1,603.00	\$1,724.00
Lame Deer H S	\$39,574.00	\$42,547.00
Laurel H S	\$41,090.00	\$44,183.00
Lavina K-12 Schools	\$1,189.00	\$1,279.00
Libby K-12 Schools	\$42,657.00	\$45,863.00
Lima K-12 Schools	\$1,600.00	\$1,720.00
Lincoln County H S	\$27,886.00	\$29,982.00
Lincoln K-12 Schools	\$3,311.00	\$3,559.00
Lockwood K-12	\$34,927.00	\$37,555.00
Lodge Grass H S	\$24,290.00	\$26,115.00
Malta K-12 Schools	\$13,808.00	\$14,847.00
Manhattan High School	\$13,422.00	\$14,435.00
Medicine Lake K-12 Schools	\$2,431.00	\$2,614.00
Melstone H S	\$2,281.00	\$2,453.00
Missoula H S	\$252,864.00	\$271,899.00
Moore H S	\$2,082.00	\$2,239.00
*Nashua K-12 Schools	\$1,679.00	\$0.00
North Star HS	\$5,070.00	\$5,451.00
Noxon H S	\$9,408.00	\$10,115.00
Opheim K-12 Schools	\$0.00	\$0.00
Park City H S	\$5,180.00	\$5,571.00
Park H S	\$31,088.00	\$33,428.00
Philipsburg K-12 Schools	\$4,382.00	\$4,712.00
Plains K-12	\$12,123.00	\$13,035.00

Plenty Coups H S	\$6,750.00	\$7,257.00
Plentywood K-12 Schools	\$6,493.00	\$6,982.00
*Plevna K-12 Schools	\$2,322.00	\$0.00
Polson H S	\$43,324.00	\$46,582.00
Poplar H S	\$40,482.00	\$43,523.00
Powder River Co Dist H S	\$3,785.00	\$4,070.00
Powell County H S	\$17,223.00	\$18,518.00
Power H S	\$2,525.00	\$2,714.00
Rapelje H S	\$822.00	\$883.00
Red Lodge H S	\$7,331.00	\$7,883.00
Reed Point H S	\$0.00	\$0.00
Richey H S	\$1,569.00	\$1,687.00
Roberts K-12 Schools	\$0.00	\$0.00
Rocky Boy H S	\$29,428.00	\$31,639.00
Ronan H S	\$47,955.00	\$51,561.00
**Rosebud K-12	\$0.00	\$0.00
Roundup High School	\$16,381.00	\$17,613.00
Roy K-12 Schools	\$1,497.00	\$1,609.00
Ryegate K-12 Schools	\$2,147.00	\$2,308.00
Saco H S	\$2,081.00	\$2,238.00
Savage H S	\$2,168.00	\$2,331.00
Scobey K-12 Schools	\$4,582.00	\$4,928.00
Shelby H S	\$13,720.00	\$14,752.00
Shepherd H S	\$15,933.00	\$17,132.00
Sheridan H S	\$3,937.00	\$4,233.00
Shields Valley H S	\$4,342.00	\$4,669.00
Sidney H S	\$23,391.00	\$25,153.00
Simms H S	\$12,660.00	\$13,613.00
St Ignatius K-12 Schools	\$17,990.00	\$19,343.00
St Regis K-12 Schools	\$6,854.00	\$7,368.00
Stanford K-12 Schools	\$2,755.00	\$2,962.00
Stevensville H S	\$30,093.00	\$32,358.00
Sunburst K-12 Schools	\$3,600.00	\$3,871.00
Superior K-12 Schools	\$7,698.00	\$8,276.00
Sweet Grass County H S	\$9,379.00	\$10,085.00
Terry K-12 Schools	\$3,460.00	\$0.00
Thompson Falls H S	\$14,088.00	\$15,147.00
Three Forks H S	\$11,661.00	\$12,540.00
Townsend K-12 Schools	\$15,255.00	\$16,402.00
Troy H S	\$15,925.00	\$17,121.00
Turner H S	\$1,315.00	\$1,414.00
Twin Bridges K-12 Schools	\$4,028.00	\$4,332.00
*Valier H S	\$0.00	\$0.00
Victor K-12 Schools	\$11,023.00	\$11,853.00
West Yellowstone K-12	\$4,572.00	\$4,916.00
Westby K-12 Schools	\$0.00	\$0.00
White Sulphur Spgs K-12	\$6,614.00	\$7,111.00

Whitefish H S	\$30,378.00	\$32,668.00
Whitehall H S	\$10,966.00	\$11,791.00
Whitewater K-12 Schools	\$0.00	\$0.00
Wibaux K-12 Schools	\$2,422.00	\$2,604.00
Willow Creek H S	\$0.00	\$0.00
Winifred K-12 Schools	\$2,606.00	\$2,802.00
Winnett K-12 Schools	\$1,443.00	\$1,551.00
Wolf Point H S	\$37,393.00	\$40,203.00
	\$3,315,410.00	\$3,541,543.00

C.4. ALLOCATIONS FOR POSTSECONDARY CTE PROGRAMS

The total amount allocated for distribution for postsecondary education CTE (other than the Reserve Fund as noted in Section C.2.) for 2023-2024 is \$1,785,221.

Of this amount, funding for postsecondary programs is determined by dividing the number of Pell grant and Bureau of Indian Affairs program recipients enrolled in the two-year postsecondary institution by the total number of Pell Grant and Bureau of Indian Affairs program recipients in the state.

The following table shows secondary eligible recipients and the dollar amounts allocated during the 2023-2024 grant cycle (including carryover):

Blackfeet Community College	\$138,344.43
Miles Community College	\$96,399.58
Dawson Community College	\$98,607.20
Fort Peck Community College	\$131,721.56
Flathead Valley Community College	\$250,197.38
City College	\$213,403.65
Great Falls College	\$259,027.88
Gallatin College	\$86,833.21
MSU-Northern	\$133,193.31
Salish Kootenai College	\$136,136.81
Helena College	\$142,023.81
Highlands College	\$89,776.71
Missoula College	\$269,330.12
UM-Western	\$77,266.84

C.5. ADJUSTMENTS TO ALLOCATIONS

If any changes in school district boundaries have occurred since the population and/or enrollment data was collected, OPI will use previous enrollment data from the school districts affected by a boundary change and consult with the affected school district officials, to ascertain how the change in boundaries may have impacted enrollment patterns. OPI will not need to consider the enrollment impact of creation of charter schools, since in Montana, charter schools can only be created within

an existing school district. The OPI will use these sources of information to develop an allocation of funds to affected districts.

C.5.a. Alternative Secondary Allocation Formula

Montana will not propose an alternative secondary allocation formula.

C.5.b Alternative Postsecondary Allocation Formula

Montana will not propose an alternative postsecondary allocation formula.

C.6. RESERVE FUNDS

The Perkins State Plan Committee voted to increase the amount of Rural Reserve from 11% to 12% for the 2024-2025 grant cycle. The Rural Reserve has been used to fund the Reserve Grant over the past several years, and the Partner Agencies plan to continue to award 12% to postsecondary institutions to fund activities related to career exploration, CTE dual enrollment, promotion of state level CTE programs of study (Montana Career Pathways) industry-recognized credential attainment, and work-based learning opportunities. These awards will continue to be awarded via a competitive grant process. Competitive grants are currently available to postsecondary partners or consortia, primarily because those LEA's have existing personnel to manage additional grant responsibilities and due to the increased cost for running CTE programs at the postsecondary level which, in Montana, are not subsidized by State education funds as they are at the secondary level.

The secondary Reserve Grant is being used to create career awareness, recruit, and retain students within a CTE Secondary Program of Study that leads to a high skill, high wage, or in demand occupations. There are currently 176 schools offering over 260 Career and Technical Education courses to students in grades 5-8 in our Montana schools. The most offered course is in career exploration. Montana does not allocate Perkins funding for middle school districts the Reserve Grant is used to encourage pathway work for the middle grades focusing on establishing innovative delivery methods for career exploration, exposing students to employability skills, establishing foundational elements for work-based learning, and improving transitions from middle grades into secondary Career and Technical Education pathways.

The Partner Agencies determined that they would continue to prioritize funding activities related to career exploration, CTE dual enrollment, promotion of state level CTE programs of study (Montana Career Pathways), industry-recognized credential attainment, and work-based learning opportunities. Competitive grant guidelines may shift from year to year to reflect emerging priorities, but as an overall theme, projects will be considered if they include:

- Piloting new or innovative CTE programs, especially those that include work-based learning opportunities;
- Introducing new or building capacity for existing industry recognized credentials;
- Increasing the number of opportunities for Montana high school students to explore and engage in college and careers through dual enrollment;
- Expand public knowledge and utilization of the Montana Career Pathways program through outreach and career exploration events and activities.

The focus for the Rural Reserve grants will be on creating new or significantly expanding existing partnerships between secondary and postsecondary partners and increasing access for all students to engage dual enrollment and/or Montana Career Pathways.

The Partner Agencies have the authority to increase or decrease the percentage of Rural Reserve the state will use each year, in addition to setting the criteria for the funding to be spent.

D. ACCOUNTABILITY FOR RESULTS

D.1. SECONDARY INDICATORS OF CAREER AND TECHNICAL EDUCATION PROGRAM QUALITY

Montana chose 5S3 as the indicator of secondary career and technical education program quality. Numerator and denominator definitions are as follows:

5S3: Program Quality – Participated in Work-Based Learning

Numerator: the number of secondary CTE concentrators graduating from high school having participated in and received credit for work-based learning. Work-based learning, as defined in the State of Montana, is a continuum of activities that engage businesses and extend the classroom into the workplace, connecting acquired knowledge and skill to a student’s future employment. Work-based learning may take place in the workplace, in a school, or in a community.

Denominator: the number of CTE concentrators who graduated during the reporting year.

The OPI developed a work-based learning manual with input from OCHE, the Governor’s Office and the Department of Labor and Industry, that described levels of career exploration through work-based learning. The OPI will use National Course Codes to capture individual student work-based learning experiences.

D.2. STATE DETERMINED PERFORMANCE LEVELS (SDPL) FORM

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10
Indicators	Baseline Level	Performance Levels							
		PY 2020-21	PY 2021-22	PY 2022-23	PY 2023-24	PY 2024-25	PY 2025-26	PY 2026-27	PY 2027-28
Secondary Indicators									
1S1: Four-Year Graduation Rate	97.12	90	92	93	95	97.13	97.14	97.15	97.16
1S2: Extended Graduation Rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2S1: Academic Proficiency in Reading Language Arts	40.62	50	51	52	53	40.65	40.75	40.85	40.95
2S2: Academic Proficiency in Mathematics	25.34	30	31	32	33	25.35	25.45	25.55	25.65
2S3: Academic Proficiency in Science	26.80	20.5	21	21.5	22	26.81	26.91	27.01	27.21
3S1: Post-Program Placement	84.31	85	86	87	88	84.32	84.42	84.52	84.62
4S1: Non-traditional Program Concentration	31.72	20	21	24	25	31.73	31.83	31.93	32.03
5S1: Program Quality – Attained Recognized Postsecondary Credential	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
5S3: Program Quality – Participated in Work- Based Learning	14.93	18	22	25	27	15.03	15.13	15.23	15.33
5S4: Program Quality – Other	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Column 10
Indicators	Baseline Level	Performance Levels							
		PY 2020-21	PY 2021-22	PY 2022-23	PY 2023-24	PY 2024-25	PY 2025-26	PY 2026-27	PY 2027-28
Postsecondary Indicators									
1P1: Postsecondary Retention and Post-Program Placement	76.41	83.8	84	84.4	84.8	76.50	76.90	77.30	77.70
2P1: Earned Recognized Postsecondary Credential	37.66	100	100	100	100	40.00	40.25	40.50	40.75
3P1: Non-traditional Program Concentration	18.04	16.8	17	17.3	17.5	18.24	18.44	18.64	18.84

D.3. STATE DETERMINED PERFORMANCE LEVEL (SDPL) PROCEDURE

D.3.A. PUBLIC COMMENT PROCEDURE

The State Determined Performance Level (SDPL) form was posted to the site mus.edu/perkinsv/public-comment.asp on March 1, 2024 and they remained on that site until April 30, 2024. The link was shared with various stakeholder groups, including teachers, faculty, college/high school staff, agencies that serve special populations, students, parents, members of business/industry, and tribal colleges. The performance indicators were posted as a part of the entire state plan available for public comment.

D.3.B. STATE DETERMINED PERFORMANCE LEVEL EXPLANATION AND PROCESS

To establish baseline numbers for the State Determined Performance Levels, the Partner Agencies both reviewed three (3) previous years of data for each performance indicator.

Secondary Performance Indicator Definitions

The term 'CTE concentrator' at the secondary level is defined as a student who has taken two or more credits in a defined Montana Career Pathway (program of study). One credit equals a year-long course or two semesters.

Numerator and denominator definitions for each secondary performance indicators are as follows:

1S1: Four-Year Graduation Rate

Numerator: the number of CTE concentrators who graduated from high school, as measured by the four-year adjusted cohort graduation rate (defined in section 8101 of the Elementary and Secondary Education Act of 1965).

Denominator: the number of CTE concentrators who, in the reporting included in the State's computation of its four-year graduation rate as defined in the State's Consolidated Accountability Plan pursuant to Section 111(b)(2) of the ESSA.

2S1: Academic Proficiency in Reading Language Arts

Numerator: the number of CTE concentrators who achieved reading/language arts proficiency in the challenging State academic standards adopted by the State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments of ACT scores.

Denominator: the number of CTE concentrators who took the ESSA assessments in reading/language arts whose scores were included in the program year in the State's computation of the AYP measure for reading/language arts.

2S2: Academic Proficiency in Math

Numerator: the number of CTE concentrators who achieved math proficiency in the challenging State academic standards adopted by the State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments of ACT scores.

Denominator: the number of CTE concentrators who took the ESSA assessments in math whose scores were included in the program year in the State's computation of the AYP measure for math.

2S3: Academic Proficiency in Science

Numerator: the number of CTE concentrators who achieved science proficiency in the challenging State academic standards adopted by the State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as measured by the academic assessments of ACT scores.

Denominator: the number of CTE concentrators who took the ESSA assessments in science whose scores were included in the program year in the State's computation of the AYP measure for science.

3S1: Post-Program Placement

Numerator: the number of CTE concentrators who, in the second quarter after exiting from secondary education, are in postsecondary education or advance training, military service or a service program that receives assistance under title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C 2504(a)), or are employed.

Denominator: the number of CTE concentrators who left secondary education during the reporting year.

4S1: Non-traditional Program Concentration

Numerator: the number of CTE concentrators, from underrepresented gender groups, in career and technical education programs and programs of study, that lead to non-traditional fields.

Denominator: the number of CTE concentrators in a CTE program or program of study that leads to a nontraditional field, during the reporting year.

Definitions for 5S2 and 5S3 are found in Section D.1.

Postsecondary Performance Indicator Definitions

The term 'CTE concentrator' at the postsecondary level is defined as a student enrolled in an eligible recipient who has (i) earned at least 12 credits and are enrolled in a career and technical education program or program of study; or (ii) completed such a program if the program encompasses fewer than 12 credits or the equivalent in total.

Numerator and denominator definitions for each postsecondary performance indicators are as follows:

1P1: Postsecondary Retention and Post-Program Placement

Numerator: the number of CTE concentrators who, during the second quarter after program completion of the prior reporting year, remain enrolled in postsecondary education, are in advanced training, military service, or a service program that receives assistance under title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C 2504(a)), or are placed or retained in employment.

Denominator: the number of CTE concentrators who completed their program in the prior reporting year.

2P1: Earned Recognized Postsecondary Credential

Numerator: the number of CTE concentrators who obtained a diploma, certificate, or credential

during participation in or within 1 year of program completion.

Denominator: the number of CTE concentrators who left postsecondary education in the prior reporting year.

3P1: Nontraditional Program Completion

Numerator: the number of CTE concentrators, from underrepresented gender groups, in career and technical education programs and programs of study that lead to non-traditional fields.

Denominator: the number of CTE concentrators in a CTE program or program of study that leads to a nontraditional field during the reporting year.

Definitions for the numerators and denominators for the secondary indicators of career and technical education program quality that Montana chose are defined in section D.1.

D.4. STATE DETERMINED PERFORMANCE LEVEL (SDPL) PUBLIC COMMENTS

On April 15, 2024, one public comment was submitted. The comment is as follows:

On Page 41, when it says that "OPI will use National Course Codes to capture individual student work-based learning experiences", is the plan referring to the course codes found on the FY 2024 Listing of All Montana K-12 Course Codes and Descriptions? Does this mean that the course codes would be used to determine receiving credits in WBL or is there a different code system to determine and track WBL experiences that are not necessarily for credit? Are there any national course codes that OPI might use that would differentiate among different types of WBL experiences (both for-credit and not-for-credit) at the secondary level?

Montana's response:

The OPI uses the NCES School Courses for the Exchange of Data (SCED) codes for all high school Work-based Learning and CTE courses, those codes are updated annually to reflect any additional codes or removal of old codes and linked on the OPI website. When students complete a Work-based Learning experience where higher levels of learning and engagement are occurring, credit should be given. Current OPI course codes reflect three types of work-based learning experience: a school-based learning experience, a workplace experience (a placement or internship with a business partner), or a Career-Project Based learning (a service or community learning project). There are no codes for not-for-credit experiences in secondary, this would fall under curricular work of a CTE course, volunteering, CTSO Student activity, or a student's own personal enrichment.

D.5. STATE DETERMINED PERFORMANCE LEVEL (SDPL) DISPARITIES OR GAPS

The Partner Agencies will provide leadership to assist school districts and two-year postsecondary institutions to gather and share information about strategies for improving performance and making meaningful progress each year. Professional development will be provided to help identify promising practices for improving performance and strengthening services to special populations.

Every local recipient will receive a report indicating how special population and nontraditional populations groups performed compared to the goals for these groups on the target performance levels. Each LEA will be required to document how they will work to close achievement gaps.

Within the combined WIOA–Perkins State Plan, Montana will treat accountability as one component of a broader, integrated performance system. The Partner Agencies will work with WIOA core partners and SWIB to align strategies for overlapping populations and will reference 406 JOBS workplan metrics and WIOA indicators when setting future CTE performance targets and developing gap-closing strategies.

PERFORMANCE INDICATOR APPENDIX

ALL WIOA CORE PROGRAMS

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

Included below are the state’s expected levels of performance relating to the performance accountability indicator’s based on primary indicators of performance described in section 116(b)(2)(A) of the Workforce Innovation and Opportunity Act (WIOA).

Note: Performance targets for PY 2026 and 2027 will not be available before the conclusion of scheduled federal negotiations (TBD), which are anticipated to begin in April 2026. Per TEGL 11-19, Change 2, “With respect to the Effectiveness in Serving Employers (ESE) indicator, since it is a statewide measure that reflects a combined result across WIOA titles I, II, III, and IV programs, the Departments will jointly engage in negotiations with state representatives from all core programs.”

MTDLI has worked extensively on performance accountability pertaining to all Core programs. The work aligns with Pillar IV: Accountability: Ensuring federally funded workforce program deliver measurable results by linking investments to outcomes and enforcing performance discipline of the America’s Talent Strategy: Building the Workforce for the Golden Age.

The indicators of performance measure and evaluate the effectiveness of individual programs and the State’s workforce development system. These indicators are well aligned with the goals described throughout the State Plan and the 406 JOBS framework to allow our programs to measure how well they are serving participants and employers. Progress toward these indicators is evaluated against the performance targets negotiated by each program with their applicable federal agencies.

During Program Year 2024, MTDLI conducted technical assistance trainings pertaining to the performance indicators. Each quarter performance reports are analyzed by program staff and shared with providers that deliver the Core Programs. If any deficiencies are identified, changes are made to make sure the services are delivered appropriately and to make sure a return on investment is met on the federal funds spent.

TITLE I: ADULT PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	71.0%	TBD	71.0%	TBD
Employment (Fourth Quarter After Exit)	69.0%	TBD	69.0%	TBD
Median Earnings (Second Quarter After Exit)	\$7,350	TBD	\$7,350	TBD
Credential Attainment Rate	53.0%	TBD	53.0%	TBD
Measurable Skill Gains	56.0%	TBD	56.0%	TBD

TITLE I: DISLOCATED WORKER PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	72.5%	TBD	72.5%	TBD
Employment (Fourth Quarter After Exit)	70.0%	TBD	70.0%	TBD
Median Earnings (Second Quarter After Exit)	\$10,800	TBD	\$10,800	TBD
Credential Attainment Rate	57.0%	TBD	57.0%	TBD
Measurable Skill Gains	50.0%	TBD	50.0%	TBD

TITLE I: YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	63.0%	TBD	63.0%	TBD
Employment (Fourth Quarter After Exit)	58.6%	TBD	58.6%	TBD
Median Earnings (Second Quarter After Exit)	\$4,100	TBD	\$4,100	TBD
Credential Attainment Rate	50.0%	TBD	50.0%	TBD
Measurable Skill Gains	50.0%	TBD	50.0%	TBD

TITLE II: ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM - ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	53.0%	TBD	54.0%	TBD
Employment (Fourth Quarter After Exit)	57.0%	TBD	58.0%	TBD
Median Earnings (Second Quarter After Exit)	\$4,500	TBD	\$4,600	TBD
Credential Attainment Rate	60.0%	TBD	61.0%	TBD
Measurable Skill Gains	55.5%	TBD	56.0%	TBD

TITLE III: WAGNER-PEYSER ACT - WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	67.0%	TBD	67.0%	TBD
Employment (Fourth Quarter After Exit)	67.0%	TBD	67.0%	TBD
Median Earnings (Second Quarter After Exit)	\$7,400	TBD	\$7,400	TBD
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable

**TITLE IV: VOCATIONAL REHABILITATION PROGRAM (COMBINED OR GENERAL) -
VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS**

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	55.7%	TBD	55.8%	TBD
Employment (Fourth Quarter After Exit)	52.5%	TBD	52.5%	TBD
Median Earnings (Second Quarter After Exit)	\$3,840	TBD	\$3,950	TBD
Credential Attainment Rate	31.0%	TBD	31.0%	TBD
Measurable Skill Gains	55.2%	TBD	55.3%	TBD

TITLE IV: VOCATIONAL REHABILITATION PROGRAM (BLIND) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a percent (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

EFFECTIVENESS IN SERVING EMPLOYERS FOR ALL SIX CORE PROGRAMS

Effectiveness in Serving Employers (ESE) – The percentage of program participants in unsubsidized employment during the second quarter after exit from the program who were employed by the same employer in the second and fourth quarters after exit. For the six core programs listed above, this indicator is a statewide indicator reported by one core program on behalf of all six core programs in the state.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Effectiveness in Serving Employers	Not Applicable 1	Not Applicable 1	Not Applicable 1	Not Applicable 1

1 Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYS 2026 and 2027.

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

ADDITIONAL INDICATORS OF PERFORMANCE

Additional Indicators of Performance

OTHER APPENDICES

No other appendices will be submitted.