

MONTANA PYS 2024-2027

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OVERVIEW

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

OPTIONS FOR SUBMITTING A STATE PLAN

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

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

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

the program-specific requirements for that program where such planning requirements exist separately for the program. The Combined State Plan partner programs are—

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

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

HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

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

- The **Strategic Planning Elements** section includes analyses of the State's economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State's workforce development

system and alignment strategies for workforce development programs to support economic growth.

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

When responding to Unified or Combined State Plan requirements, States must identify specific strategies for coordinating programs and services for target populations.² States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations. 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. Public reporting burden for this information collection is estimated to be 86 hours per state; including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Responding to this collection is required to obtain or retain the Federal grant benefit. In addition, responses to this information collection are public, and the agencies offer no assurances of confidentiality. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Office of Workforce Investment, and reference OMB control number 1205-0522. Note: Please do not return the completed plan to this address.

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

I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

A. WIOA STATE PLAN TYPE

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

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

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

This is a combined plan

COMBINED PLAN PARTNER PROGRAM(S)

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

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

No

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

No

Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))

No

Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))

No

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

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.

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.

Montana's economy experienced extraordinary growth post-pandemic. In 2022 alone, the state added over 20,000 jobs, the most jobs added in one year for the entire history of the Local Area Unemployment Statistics (LAUS) program. To put this record-breaking growth into historical perspective, in the decade of expansion prior to the pandemic employment grew by an average of 7,100 jobs per year. Montana's 2022 job growth was nearly three times that pace.

Rapid employment growth in the post-pandemic era means there are more Montanans working than ever before. Through the first half of 2023, the Montana economy employed over 68,000 more people than it did three years earlier. This is the same number of jobs added during the entire decade of expansion following the Great Recession in 2009 (US BLS LAUS), creating unprecedented demand for workers and rapid growth in the labor force.

A significant uptick in people moving to Montana from other states (US Census Bureau Components of Population Change) has increased Montana's population and added to the labor force. In addition, strong wage growth helped labor force participation rebound from pandemic dips. Altogether, Montana's labor force has grown by 30,000 people in the last three years (US BLS LAUS). Despite this trend, labor supply has not kept up with rising demand. The total number of unemployed workers in Montana fell to record lows as unfilled job openings have skyrocketed. There are over three unfilled job openings per unemployed worker in Montana (US BLS Job Openings and Labor Turnover Survey and LAUS). Unemployment rates fell and remained under 3%, well below national averages (US BLS LAUS). Wage growth in Montana reflects the short supply of labor and workers' leverage in the labor market. Montana ranked 4th for average annual wage growth in the nation (US BLS QCEW) in 2022.

Alongside these recent trends is the long-term demographic challenge of an aging workforce, as large numbers of Baby Boomers retire from the workforce. Overall labor force participation has followed a declining trend, despite rising participation in the labor force among workers under 54, due to the large number of retirees and near-retirees in the population. (<https://lmi.mt.gov/Home/Job-Tracking>) Montanans not in the labor force, for reasons other than retirement, surpassed 200,000 individuals in 2022 (IPUMS CPS, 2023). These demographic realities will create on-going labor scarcity for Montana's businesses.

Over the last 3 years, high levels of domestic migration into Montana buoyed the labor market (U.S. Census Bureau, Components of Population Change). While the outlook for Montana's economy is strong, the labor market is likely to face general shortages in workers. Businesses across most industries and occupations will face challenges recruiting workers, emphasizing the need for worker training to improve productivity among existing workers and ensure great engagement among populations with lower labor force participation, including those facing barriers to employment due to disabilities or other challenges.

(i) The projections discussed here refer to Montana Department of Labor & Industry's (MTDLI) Occupational Employment Projections for 2022-2032. Forecasts point to the construction sector becoming the largest contributor to job creation in Montana until 2032. Shortages in housing supply and high prices in the housing market are likely to keep demand for workers high. In addition, federal infrastructure investments will provide further stimulus to the construction industry, requiring additional workers and associated training. This stimulus will drive expansion in heavy and civil engineering construction, while also driving growth in residential projects arising from homeowner utilization of rebate programs for electrification projects. Construction is expected to add a 10-year average of 1,060 jobs added per year through 2032. 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. Construction and extraction occupations are projected to have 4,910 annual job openings from growth and turnover combined. Emphasizing on-the-job training and apprenticeship programs will be key to meet high demand in these occupations, specifically for jobs such as construction laborers, carpenters, plumbers, and electricians, among others.

Another sector of existing high demand is healthcare and social assistance. This sector struggled through the pandemic and failed to grow as rapidly as previously projected. Factors such as the closure of nursing homes, burnout among healthcare workers, and delaying of care during pandemic lockdowns led to lower employment in 2020 followed by modest growth in 2021 and 2022. Childcare facilities that grappled with staffing shortages during the pandemic continue to encounter challenges in retaining adequate staffing levels due to the difficulty of raising employee wages while keeping care affordable. Going forward, healthcare will continue to be in high demand. With over a quarter of nurses surveyed saying they intend to retire within the next five years (Trautman, 2023), worker demand will remain high too. Critical healthcare occupations in demand include home health and personal care aides (1,950 annual openings), nursing assistants (750 annual openings), and registered nurses (640 annual openings) (Ibid).

Professions tied to food preparation, sales, and office and administrative support are projected to experience the greatest numbers of job openings until 2032. These occupations, where workers with disabilities are often overrepresented nationally, could present good opportunities to engage and employ disabled workers in Montana. These jobs have high concentrations of employment in high employment industries while also tending to experience high levels of turnover due to typically lower than average wages. For these occupations, total numbers 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 during secondary education. The state agency's workforce development resources are therefore channeled towards occupations that require advanced skills requiring post-secondary education 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 the wave of retirements, resulting in a low supply of unemployed workers. Focusing on occupations with high median wages (above \$45,000) reveals areas of need that require investment in postsecondary education, including positions such as truck drivers (1,020 annual openings), supervisors of retail sales workers (830 annual openings), and operating engineers (510 annual openings), among others. The broad areas of need require strategies capable of addressing a diverse array of occupational needs for businesses across Montana.

(ii) Montana's professional and technical services sector experienced remarkable growth and emerged as one of the state's most rapidly expanding industries. The sector continued to grow through the pandemic with 7.7% growth from 2019-2021 due to the ability of professionals to work remotely. The increased popularity of remote work not only shielded the industry from negative impacts but also may allow workers who might have previously faced geographic barriers or disabilities to engage more fully in these fields. 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 offer 70-180 annual job openings each, with a median wage surpassing \$45,000.

The manufacturing industry also experienced recent strong growth and emerged as an area of significant worker need. The production occupations prevalent in this industry tend to employ a relatively higher share of disabled workers nationwide, which makes the substantial need for workers in this industry an opportunity to engage more disabled workers in Montana. At a median wage of just over \$40,000 in the state, production occupations typically offer wages just below the statewide median of \$42,210. 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, 2,500 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 \$37,000-\$59,000, presenting viable opportunities for workers facing employment barriers.

Federal stimulus will also play a role in some emerging industries and occupations in Montana. The state recently received federal stimulus through its designation as a regional tech hub in photonics and remote sensing technologies. Awarded by the U.S. Department of Commerce, the Headwaters 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. The stimulus provided to this industry through the Headwaters 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. Other investment in worker training through federal stimulus has been awarded in the form of Training for Residential Energy Contractors (TREC), targeting emerging occupations that will support new energy rebate programs for residential electrification.

With the construction industry experiencing strong growth, architectural and engineering occupations are also experiencing high demand. While the total number of job openings in this sector is relatively low, the jobs require significant training and offer high wages. Civil engineers, architectural and civil drafters, and architects are in the greatest demand. These roles present between 70-160 annual job openings each, accompanied by median wages surpassing \$57,870.

(iii) 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 needed 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 shaping 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 and 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 to assist customers seeking rebates provided for under the Inflation Reduction Act. Energy auditors and retrofitters are two occupations that will require additional focus.

Employer feedback related to licensing and credentialing suggested a need for greater collaboration with MRAP and higher education and suggested frustration with an often-confusing 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.

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 array 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. 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 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.

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. 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.

(i) In 2022, total employment in Montana reached 552,452. After adding more jobs in a year (20,900) than any other year in state history, total employment reached historic highs (US BLS LAUS). This job growth reflects a strong economy in Montana and employers' desire to expand and increase output. Worker supply filled many jobs following pandemic layoffs and in-migration increased significantly, but even so a substantial level of unmet demand for workers remained. With only 13,000 unemployed people across the state, nearly all workers seeking employment were able to find jobs and the unemployment fell as low as 2.3%.

In 2022, the labor force grew above 575,00 people in part due to high levels of migration of workers from out of state. More than 40,000 people moved to Montana than left the state from 2020 to 2022 and 65% of these in-migrants are in the labor force. Net migration was greatest in the western half of the state and centered in Missoula and Bozeman. However, this trend will be challenging to continue as pandemic shocks to migration rates subside and some factors that made Montana attractive to movers, such as housing affordability, change. Assuming in-migration will not continue at record setting paces, growth of the labor force will be constrained in the long-term by the trends of an aging population and increased retirements. The number of retirees in the state surpassed 200,000 in 2022. The aging of the population affects all of Montana's regions, but urban areas and education centers tend to have younger populations overall.

Montana's labor force participation rates (LFPR) recovered from the pandemic, but are affected by the long-term trend of an aging population. Montana's population is older than average, 20% of Montana's population are age 65 and older compared with 17% nationally (source: U.S. Census, 2022 American Community Survey 1-Year Estimates for Montana, Table DP05). Labor force participation saw declines in 2023 due to this trend, sitting at to 62.6% in October 2023, slightly below the national average. Among different age groups, older workers close to retirement (age 55 to 64) contributed most to the labor force participation declines in 2023. The pre-retirement population currently accounts for 23% of individuals out of the labor force

who want a job (<https://lmi.mt.gov/Home/Job-Tracking>). Younger workers under 24 have resumed participating in the labor force above pre-pandemic levels. Currently, young workers make up 20% of individuals not in the labor market but interested in a job. Rising wages among the Montana labor market have already attracted young and prime working-age Montanans into the labor force and brought participation rates above pre-pandemic levels. Future improvement in LFPRs will require addressing barriers to employment.

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

Native Americans are Montana's largest minority population. Individuals claiming American Indian ancestry alone or with another race comprise 7% of Montana's labor force. Montana's Native American population has similar labor force participation rates to the statewide average. However, the unemployment rate of Montana's Native American population is higher than the state's, at 9.2% compared to 3.0% in 2022 (source: U.S. Census, 2022 American Community Survey 1-Year Estimates for Montana, Table S0201). Montana's native populations are centered in the reservation areas, but significant populations are present in all urban communities.

Roughly 40,000 Montana workers between the ages of 18 to 64 have a disability, with the most common types of disability being a cognitive difficulty, followed by hearing difficulty. Roughly 2,900 Montanans with a disability are unemployed, at an unemployment rate of 7%. About 35,000 Montanans with a disability are not in the labor force, representing a sizeable untapped labor pool. The most common disabilities among those not in the labor force are cognitive difficulty followed by ambulatory difficulty (source: U.S. Census, 2022 American Community Survey 1-Year Estimates for Montana, Table B18120).

Among U.S. states, Montana has the 4th highest share of veterans in the population with over 82,000 veteran residents (<https://lmi.mt.gov/dashboards/MTVets>). While unemployment rates for veterans in Montana are not different from the overall workforce, labor force participation rates are lower (76.2% for veterans compared to 78.4% for all Montanans). Differences in labor force participation for veterans arise from higher rate of disabilities and an older age distribution compared to all Montanans. Addressing barriers for veterans not in the labor force could bring more high-skill workers into the labor market.

Childcare availability issues in Montana have prevented many parents from fully participating in the labor force. In 2022, a monthly average of 22,800 Montana parents were unable to participate in the labor force due to family responsibilities and a lack of childcare, with an additional 45,000 Montana parents underemployed or working reduced hours. These parents total to 8% of the state's labor force. Labor force participation rates of parents have increased over the last five years, reaching 81.4% in 2022 compared to 77.7% in 2017. However, parents are not working as many hours as they did in 2019. By 2022, the average workweek for Montana parents shortened by about 1.5 hours. Parents of children under five reported the most significant decline in hours worked. Addressing childcare as a barrier will be a valuable piece to workforce strategies. Montana's workforce strategy includes engaging more workers into the labor market, which will require addressing significant barriers. Providers and

employers both indicated during stakeholder engagement that WIOA clients face multiple barriers to employment, a lack job-readiness skills, and require flexibility in scheduling so they can balance other obligations childcare, court dates, mental health appointments, health care, etc.). Labor market information and census data on employment barriers is not available, but administrative data can be helpful to understand these populations. Assisting individuals with criminal backgrounds can improve employability and reduce recidivism. The 3-year recidivism rate among Montana adults leaving the state corrections system is nearly 37%. <https://cor.mt.gov/>

Over the past six years, over 2,000 individuals with barriers arising from criminal backgrounds were assisted with WIOA and Wagner-Peyser funding. Addiction issues are another rising challenge in workforce development. Montana's rate of opioid misuse is 3.9%, above the national average and rising.

https://dphhs.mt.gov/assets/publichealth/EMSTS/Data/Opioids_1pager.pdf

The demographic challenges that constrain the workforce make investments in worker productivity important. Identifying training to maximize the potential of individuals will make Montana's economy more resilient. Additionally, finding trainings that prepare workers with short training turnarounds, on-the-job components, and early in their careers (such as career and technical education programs in secondary schools) is critical to maximizing existing labor pools and fueling Montana's fast-growing economy.

(ii)

CHARACTERISTICS OF THE UNEMPLOYED

Montana's unemployment rate has been below 3% for two years, leaving an average of 15,000 individuals unemployed each month and an average of 5,840 people filing unemployment insurance claims each week. At the end of 2023, unemployment insurance claimants tended to be male (64%), between the ages of 25 to 54 (66%), and white (91%), with a top educational achievement (roughly 55%) of high school or less. Workers with low education levels are more likely to be among unemployment insurance claimants. (source: MTDLI Job Tracking Dashboard, Unemployment Insurance tab, at lmi.mt.gov/home/job-tracking.

Accessed Dec 2023).

CHARACTERISTICS OF THOSE NOT IN THE LABOR FORCE:

Over 60% of Montana's non-working population over age 16 are retired. Other common reasons are a disability or illness (12.3% of nonworking Montanans); taking care of family (10.1%); or attending school or other training (10.0%). Only 4% provide other reasons for not being in the labor force, including mental illness, lack of transportation, previous felony or misdemeanor conviction, lack of housing, domestic violence, or lack of economic opportunity (source: MTDLI Job Tracking Dashboard, Finding Workers tab, at lmi.mt.gov/home/job-tracking.

Accessed Dec 2023).

LABOR MARKET TRENDS:

More Montanans are working than ever before and the unemployment rate has never been this low. Employers in all areas of the state and in every industry and occupation are having difficulty finding sufficient workers. Shortages are most acute in low-wage occupations where the ability to recruit workers employed in other lower-pay positions is not possible. 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 of incumbent workers to raise productivity and increase worker retention, providing on-the-job and work-based learning opportunities, and facilitating short-term training across a broad set of industries and occupations.

(iii) Montana's workforce is well-educated, with the fourth highest share of the population with a high school diploma or equivalency among states in 2022. Roughly 66% of Montana's population has some type of post-secondary education. However, only about 44% of Montana's population has a post-secondary diploma or certification, leaving a large population of Montana workers just a few steps away from completing their training (source: U.S. Census.2022 American Community Survey 1-year estimates, table S1501). Those without post-secondary credentials are roughly twice as likely to be unemployed or out of the labor force. Among those without some post-secondary education, 29% are out of the labor market (compared to 15% among those with some post-secondary education) and 3.6% are unemployed (compared to 1.8%). Using MTDLI employment forecasts through 2032 and the Bureau of Labor Statistics (BLS) minimum training requirements, the number of jobs requiring some post-secondary training will increase at an average annual rate of 0.9% over the next ten years. Roughly 19,000 new jobs, that require some level of post-secondary training, will be created in Montana over the next ten years.

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 made adding alternative curriculums easier for schools, adding greater access to career and technical education. Several schools established programs to train students for the construction trades through pre-apprenticeship or other curriculum adjustments, often with students obtaining an industry-recognized credential on completion. Dual enrollment of secondary students in post-secondary programs has increased in popularity and led to greater attainment of post-secondary credentials and degrees. The Montana University System (MUS) also formed a Non-Credit Workforce Training and Credentials Taskforce to expand credentialing options for incumbent workers looking for short-term training and launched the "Year to Career" initiative to train students for high-demand roles more quickly by including work-based learning in curriculums.

The SWIB also obtained a waiver to increase WIOA youth enrollment in dual credit courses utilizing the MUS One-Two-Free Program. If a student utilizes the One-Two-Free program and exhausts their 2-year or community college benefit with that program, WIOA Youth funding can be used to pay for additional courses and/or supportive services. For students who may not have access to the One-Two-Free program, including tribally affiliated students, WIOA Youth funding may be used for dual credit courses. The WIOA Youth waivers aim to increase post-secondary credentialing.

C. 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.

Montana's labor shortage made it difficult for businesses to find workers, but 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 with MTDLI to try new initiatives and engage with worker populations that previously went overlooked. Older workers, disabled workers, those with criminal backgrounds, those requiring flexibility with family care responsibilities, and workers in remote and reservation areas are now sought after to help address workforce needs. Work-based learning opportunities have been popular for employers willing to train a worker on the job or "try out" an individual who needs a chance.

In Montana, those without access to training and work opportunities often live in rural and reservation areas, which are higher-cost clients to engage and serve given overhead costs are spread over a lower population. Montana is working to increase co-enrollment across programs and share building space with more WIOA partners and other community service providers to offer clients better One-Stop access to services while spreading overhead over more programs. Montana is also grateful for strong workforce engagement by business and economic development groups, who offered remote office space and assistance in business outreach for our traveling apprenticeship, Job Service Montana (JSM), and business engagement staff.

To address overall funding restraints, Montana is also working with worker training partners funded through Perkins and TANF programs to better coordinate service delivery and reduce conflicting and unnecessary barriers to program participation. Braiding funds from multiple programs can provide wrap-around support for workers seeking greater opportunities from work and can spread overhead costs over additional funding streams. Feedback from stakeholder engagement suggested that better coordination and co-enrollment between Adult Education and WIOA programs would facilitate greater HiSET and GED attainment. MTDLI has worked to expand access by offering free office space and resources to AE clients attempting the HiSET, particularly in the rural areas where clients must drive hours to get to training and testing facilities, but additional opportunities exist for greater partnership and co-enrollment of clients.

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 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 (Watson, Amy. "Montana Postsecondary Workforce Report" available at lmi.mt.gov).

Engaging with tribal WIOA partners to better provide services on Montana's reservation areas has also been critical to engaging more Montanans into work and training opportunities. MTDLI added a Tribal Liaison position to strengthen partnerships with tribal WIOA and economic development efforts and with tribal nations.

Businesses are also engaged in upskilling incumbent workers to increase productivity and retain their existing workforce in career opportunities within the business. Montana offered short-term training of incumbent workers to employers through the ARPA Rapid Retraining funds, which was very popular. As the ARPA funding ends, Montana is looking for additional funding sources that may be targeted towards short-term trainings that can be completed while the worker is employed full-time.

Short-term training programs also require re-tooling of traditional curriculums to maintain credential quality while also acknowledging skills gained from working. Montana has provided workforce funding through ARPA and state-level funds for a nonprofit, Accelerate Montana, to develop curricula for short-term training for incumbent workers. WIOA providers work with Accelerate Montana to identify and recruit employers interested in training incumbent workers and individuals wishing to move into the career training slots. This partnership has increased the number of short-term trainings available to the Montana workforce, but permanent funding to maintain this focus on short-term trainings has not yet been secured.

Montana also made some changes to their state-funded Incumbent Worker Training (IWT) program, which provides grants to businesses to upskill their workforce for greater productivity and wage growth for the workers. Since these changes, the state-funded program has expended all available funding. Future conversations may explore additional options to expand funding for IWT, potentially with WIOA funding, allowing for better partnerships with Montana businesses to develop and upskill all Montana workers.

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 strategy is developed by the State Workforce and Innovation Board (SWIB) in conjunction with several private and nonprofit entities, the legislature, the Governor, and several state agencies, including 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. The SWIB is administratively attached to MTDLI. The Veterans State Grant (JVSG) program, along with other workforce programs, is operated by MTDLI. Workforce representatives assisting clients through the Disabled Veteran Outreach Program (DVOP) and Local Veteran Employment Representative (LVER) 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.

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.

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 and LVER 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 JVSG, DVOP, and LVER programs 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 and Local Veterans' Employment Representatives, 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. LVER staff engage in outreach efforts with employers and advocacy to increase employment opportunities for veterans. They also facilitate the establishment of job training programs and monitor compliance related to veterans' employment across the state's workforce system.

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 with services provided by private providers, serves state Medicaid 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 went 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 themes in 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 also funded the development of short-term training for incumbent workers through an investment in Accelerate Montana, a non-profit that addresses workforce needs in Montana. Montana has provided workforce funding through ARPA and state-level funds for a nonprofit, Accelerate Montana, to develop curricula for short-term training for incumbent workers. WIOA providers worked with Accelerate Montana to identify and recruit employers interested in

training incumbent workers and individuals to fill career training slots. This partnership has increased the number of short-term trainings available to the Montana workforce, but permanent funding to maintain this focus on short-term trainings has not yet been secured.

Montana is also working to increase operational efficiency with increased feedback to 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 is currently running on obsolete and unsupported technology. MTDLI is currently involved in the development of a new case management system for the WIOA Titles I and III, including veterans' services. WSD2.0 (name may change before launch) includes private and public providers in the development and testing of this new system. Features will include automatic logging of services (currently staff process the service and then log it, which is unnecessarily time-consuming), better web-services and data sharing between systems storing unemployment data, TANF and SNAP eligibility, Medicaid eligibility, and potentially apprenticeship data. 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 across 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 system demonstrates a great many strengths, including the greater attention from businesses and policy makers in workforce development activities. The state's labor shortage makes it difficult for businesses to find workers but has created an environment full of opportunities for marginalized worker populations and engagement in workforce development activities by businesses, nonprofits, and policy makers. MTDLI leaned into this opportunity to provide greater resources into business engagement, including the launch of a business engagement team, and by conducting greater outreach and collaboration with nonprofits, policy groups, economic development, education partners, tribal workforce partners, and other entities interested in growing Montana's workforce.

In urban centers, robust collaborations flourish among economic development associations, K-12 education, post-secondary institutions, coordinated employer networks, and various non-governmental organizations. These partnerships serve as catalysts for comprehensive systems, garnering essential stakeholder support to effectively tackle current and anticipated workforce challenges. On the flip side, rural areas, confronting resource constraints, serve as hubs of innovation. Local communities, recognizing their unique challenges, are devising inventive solutions by leveraging regional relationships to address workforce and economic development

hurdles creatively. Montana's rural nature—which is valuable for strong local partnerships in tight-knit communities—also presents challenges in service delivery. Geographical distance to needed services and limited access to local training opportunities are barriers that the state works to minimize, but limited funding and the fiscal inefficiencies of a physical presence in remote communities continues to be a focus. Stakeholder outreach efforts in rural areas indicated that employers want JSM or other WIOA provider staff to be present in the communities, particularly for Wagner-Peyser business services. Employers asked for greater physical presence of staff in rural areas, often suggesting cost-effective solutions like shared or donated office space to increase operational efficiency.

Another strength is the research and data units at MTDLI, OCHE, and other partners that help create better information for decision-making and targeting of workforce efforts. For example, the partnership and collaboration between MTDLI, MUS, and statewide private and tribal colleges to share data for research, comparing the supply of graduates entering Montana's labor market to the needs of Montana employers has helped policy makers and education system administrators right-size programs and add curricula for emerging fields. These data units also provide excellent evaluation of workforce programs, currently partnering with the Federal Reserve Bank of Minneapolis on a joint randomized evaluation for the RESEA program, conducting evaluation of cost-effectiveness and outcomes for WIOA and JVSG, providing information on the effect of childcare unavailability on the labor force, and developing better data dashboards for providers to understand the outcomes of clients served.

Another strength of the Montana workforce system is MRAP, which has posted strong growth in apprentices and sponsors steadily over the last ten years. It currently has more apprentices in training than ever before. Montana intends to continue to grow this program, utilizing it to engage worker populations who may not be interested in or able to attend traditional college schooling.

Montana also works to increase the career and technical training opportunities for high school students through work-based learning or pre-apprenticeship programs. The lack of opportunities is a weakness in Montana, particularly in rural communities where schools find alternative curriculums difficult to manage with limited staff. However, the attention and collaboration of workforce partners and policy makers in addressing this weakness has created great opportunities for improvement in this area. Work-based learning offers high school students a pathway to showcase subject matter proficiency, earn course equivalency, and gain valuable industry experience. Montana also established a technical apprenticeship curriculum in key industry sectors, i.e., healthcare and IT. Collaborations with two-year and community colleges statewide reflect a comprehensive and adaptive approach to skills development.

Montana does anticipate challenges due to our lack of future funding for short-term incumbent worker training, which is one of our most valuable tools to address worker shortages by improving productivity among the existing workforce. The expiration of the ARPA rapid retraining funds will make it difficult to meet employer demand for short-term, skill-based incumbent worker training.

One area of focus is increasing employment opportunities for the state's veteran population. Montana aims to leverage the JVSG, DVOP and LVER programs to strengthen outreach, support services, and employer partnerships specific to veterans' needs. However, rural service delivery remains a challenge in ensuring equitable access to DVOP and LVER services for veterans across

the state. The state will look at innovative solutions like rotating staff, mobile services, and virtual access to extend the reach of these veteran programs.

MTDLI is focused on improving our data systems, which is certainly a current weakness, and hopes to take advantage of the current investment to increase performance feedback to providers. Current systems support internal data needs but fail to provide adequate resources for communicating performance feedback to partners. When partners and subcontractors underperform, Montana needs more robust data tools to communicate these deficiencies in a timely and accurate manner while protecting client confidentiality. Montana's new workforce case management system will help in this area along with the development of additional BI tools that providers can access, including performance dashboards and statewide comparison tools.

Both the rural nature of the state and the need to invest in data systems contribute to Montana's focus on cost-reduction efforts as well. Limited funding streams to address these mean MTDLI must weigh improvement and expansion activities against the available funding. The agency continues to work to reduce unnecessary administrative costs and seek the most cost-effective strategies for program implementation, while not reducing quality of service.

C. State Workforce Development Capacity

Montana is committed to crafting a robust workforce system through statewide collaboration. The Governor and statewide leaders prioritize ongoing evaluation and enhancement of Montana's education and workforce systems. This ensures effective coordination of strategies and services, a comprehensive understanding of the state's workforce needs, and proactive solutions to emerging challenges. However, the current capacity to provide workforce training will end with the expiration of the ARPA rapid retraining funding, leaving significant unmet employer demand for short-term incumbent worker training. Other federal investments may help address this gap, such as federal grants awarded for the Headwaters Tech Hub, infrastructure investment, and PROWD grant. However, these grants are not available for all employers and workers.

Montana has attempted to address funding restraints by reducing administrative costs across all workforce programs, removing 40 FTE from MTDLI's Workforce Services Division during the last legislative session, and modernizing IT systems to find greater staffing efficiencies while providing better data-driven feedback on performance. Montana has also increased the expected amount of employer resource donation when establishing new programs, including the donation of space and equipment for classes and worker training activities. The new business engagement team typically seeks buy-in from all collaborating partners, with significant braiding of funding from multiple programs. Private sector investment is often used to stretch limited public sector funding. MTDLI works to share office space across providers for WIOA, JSVG, VRBS, AE, MRAP, and other workforce partners, now more feasible with more remote workers. This solution spreads the building and other overhead costs over more programs.

Montana has increased the collaboration and ability to braid funding to find greater cost-effectiveness while also improving service. Montana is actively pursuing collaborative projects to enhance customer service across the state, coordinating with industry, education, and workforce partners to understand and map credentials across agencies. Strong relationships with economic development partners to align workforce development with community needs is

crucial, as are collaboration with industry and health and human services partners to serve Medicaid participants and strong ties with education partners to raise awareness about career and technical education. An ongoing commitment to strategic business engagement, in partnership with VRBS on behalf of clients with disabilities, reflects Montana's holistic approach to workforce development. This collective effort extends beyond evaluation and fosters meaningful changes in communities statewide. Sustained communication and collaboration are evident in technical assistance for regional stakeholders, business engagement training, cross-training programs for core partners, and collaboration within Community Management Teams (CMTs) at the local level.

To bolster its capacity to serve veteran job seekers, Montana has dedicated resources through the JVSG to fund DVOP and LVER staff positions across key population centers. DVOP specialists are out-stationed to reach a wider veteran audience. The state is evaluating opportunities to integrate LVER staff with economic development efforts and business outreach teams to facilitate better promotion of veteran hiring initiatives with employers. This coordination augments the state's ability to match skilled veterans with current workforce needs.

Finally, Montana is working on building technical capacity through the modernization of the WIOA case management system, a priority for the Governor. Current systems support internal data needs but fail to provide adequate resources for communicating performance feedback to partners. This system will help provide better performance feedback to providers while also saving staff time through improved processes.

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.

[8] Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; eligible migrant and seasonal

farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families Program; single parents (including single pregnant women); and long-term unemployed individuals.

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

3. PERFORMANCE GOALS

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

4. ASSESSMENT

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

1. Vision

Montana's vision is to provide economic opportunity through work for every Montanan, increasing access to workforce training systems to workers in urban, rural, and reservation areas and engaging more Montanans into the labor force. With record low unemployment rates, Montana workforce training delivery needs to engage with businesses to upskill employed workers, raise wages and worker productivity, and increase access to trainings for populations with significant barriers to employment. Finally, with increasing inflation, limited state dollars, expiring ARPA funding, and flat federal WIOA funding, Montana's workforce efforts must continue to improve cost-effectiveness in delivery by collaborating with training partners and private sector stakeholders, modernizing technology to streamline operations, and ensuring WIOA providers are providing successful, cost-effective services.

2. Goals

(A) Montana wishes to bring economic opportunity through work and workforce training programs to all Montanans, particularly those in rural and reservation areas. Montana's goals for preparing an educated and skilled workforce are to leverage partnerships with WIOA and other workforce training partners to improve access to workforce training; specifically, continued collaboration with VRBS to improve referral services and ensure employment accessibility to all workers. MTDLI is currently exploring technology systems that would allow for smoother referrals between WIOA partners.

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 intends to also create better partnerships between the Adult, Youth, and Dislocated Worker programs and Adult Education. Montana's rural nature makes it difficult to serve all communities with HiSET training and testing, but this service is critical to engagement of certain worker populations. These core program teams are working to better understand each department's provision of WIOA services and find opportunities where we can empower greater reach of both programs. More work is needed to find greater efficiencies and ensure all Montanans have access to these services.

To facilitate more frequent co-enrollment with other workforce programs, MTDLI's policy teams are working to simplify and reduce barriers for enrollment in 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 improve reporting, participation, and outcomes in Montana's WIOA Youth program. MTDLI staff have been working with 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.

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. Working with the Montana Department of Corrections and other partners, MTDLI's business engagement team is facilitating conversations regarding better training for workers in custody and ways to connect workers with employers post-release. MTDLI will use the PROWD grant to work with federal residential re-entry centers to place workers exiting federal custody into 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 launched 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 hired a Tribal Liaison, who has been successful in establishing increased communication, partnership, and conferences between MTDLI's various workforce programs and tribal leaders. Montana looks to increase these connections, sharing information and workforce efforts with tribes when requested.

(B) With record low unemployment rates, Montana workforce training delivery needs to engage with businesses to upskill employed workers, raising wages and worker productivity. The work shortage led to Montana's employers and business groups being very engaged and interested in partnering with MTDLI on workforce development efforts.

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. Since it expanded eligibility, MTDLI exhausted grant funding each quarter for small and medium-sized businesses, suggesting increased funding may be needed.

MTDLI also recently added a business engagement team to conduct outreach to employers about workforce needs and work with workforce partners to address these needs, allowing businesses to utilize the convenience of a wide variety of programs with one point of contact. The business engagement team is 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.

Business engagement efforts also continue at the JSM offices and among other WIOA providers. JSM offices are engaged in their local business community, offering Wagner-Peyser services to help businesses find, train, and recruit a workforce. Staff serve on local workforce, economic development, or Chamber of Commerce boards and bring access to statewide workforce programs into local communities through their efforts.

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. MTDLI is also collaborating with the state's energy office to provide labor market data on the occupations and skills needed for the infrastructure improvements paid for by the Infrastructure Investment and Jobs Act (IIJA). Montana plans to direct these infrastructure funds to private sector investors, coordinating with these employers to ensure a strategic approach to workforce training for the infrastructure sectors.

The Gianforte Administration and MTDLI continue to expand the use of registered apprenticeship training, 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 the Gianforte Administration 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 through the use of labor market data to understand where our workforce systems have been impactful, and where improvements are warranted. This plan details many of the ways the state uses data to improve service delivery, assure equitable access to workforce programs, and continuously refine our practices. In addition to data, 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, JSEC groups, tribal outreach efforts, and other partner and stakeholder venues.

At the program level, Montana again 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. 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

An updated version of this report is in development.

2. 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

3. The DO Bureau is currently partnering 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 is being used and will inform Montana's service delivery model for RESEA.

4. An in-progress evaluation of those individuals who are out of the labor force in comparison to those who the state is currently serving in many of the core WIOA programs. This evaluation will inform populations that may need to be targeted to help address the state's workforce shortages. At both the state and program level, information from formal assessments and stakeholder feedback is used to inform actions taken. At the state level, data and stakeholder feedback is shared across partners and used during 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)

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)

1.

All Montana industries and occupations are having difficulty finding workers in the current tight labor market. Montana's efforts are therefore focused on recruiting new workers into the labor market (including those with lower labor force participation rates as mentioned above), upskilling existing workers for greater productivity and retention, and finding cost efficiencies to stretch limited workforce dollars while improving service delivery. Strategies to achieve this vision include increasing collaboration with multiple stakeholders, with particular attention to WIOA, JSVG, VRBS, and tribal partners, and also including education and training partners, private sector business groups, employers, local governments, veterans' support nonprofits, and community service providers. Improved collaboration will also increase co-enrollment. MTDLI staff (including those in the JSVG program) are also examining program requirements and processes to simplify service delivery and ensure program rules facilitate collaboration and co-enrollment. MTDLI is particularly interested in pursuing greater collaboration with Adult Education, VRBS, and tribal WIOA partners.

Montana is also pursuing operational efficiencies to stretch program dollars, including a modernization of the case management system (a priority for the Governor) and improved analytics and performance feedback for providers of WIOA, JSVG, RESEA, and other workforce programs. Sharing of space with other partners to increase overhead will also create cost-efficiencies and leads to greater collaboration between partners.

In terms of engaging new populations of workers into the labor market, Montana is active in making program improvements at the state legislative level and among local school districts to increasing credentialing at the high school level, hoping to retain and engage more youth. MTDLI targets childcare occupations to increase opportunities for labor force engagement by caregivers and parents, creating career pathways to credentialing through pre-apprenticeship or associate credit programs. MTDLI is also working to increase staff presence in rural and reservation areas of the state to better engage non-urban populations, including the veteran's population, which has limited coverage for DVOP and LVER services in the Eastern frontier regions of the state. Ongoing engagement of employers to employ those with disabilities will continue. Utilizing the strength of the state's apprenticeship program and federal investment, workers with criminal backgrounds are encouraged to find productive and profitable employment and remain engaged in the labor force.

Montana has also received significant federal investment through infrastructure funding and the establishment of the Headwaters Tech Hub, which targets both veterans and native populations for worker engagement. This work involves adapting current educational pathways to ensure credentialing in the necessary fields, particularly in energy efficiency and photovoltaics.

Finally, strategies for increasing the upskilling of incumbent worker populations require continued improvement and investment in business engagement activities, allocating funding appropriately to support short-term training that can be accomplished by someone with a full-time job, and identifying additional funding sources (including employer-funded training) to stretch limited program dollars. MTDLI plans to utilize the ability to transfer funds between the Adult and Dislocated Worker programs for adult employment and training activities, hoping to increase funding towards currently employed adults in need of upskilling to improve wage and employment outcomes.

2. Montana intends to continue in-person gatherings of WIOA partners (including AE, VRBS, JVSG, and other workforce programs), expanding to private WIOA providers and workforce efforts outside of the programs targeted in 2023. These efforts will encourage warm handoffs between workforce providers and other community service organizations and improve collaboration between programs. In addition, MTDLI intends to continue efforts to house WIOA partners within JSM locations to share building costs with more programs and reduce administrative costs. Additional co-location of space is made possible by greater remote work post-pandemic. 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.

MTDLI has also engaged in conversations with Adult Education and VRBS to identify areas where we could better partner to provide services, particularly in rural and reservation areas and to veterans through the JVSG. This collaboration offers rural workers needing HiSET classes, testing, and training a setting close to home, increasing the HiSET completion rate.

Development of a more cost-effective and efficient case management system will address a weakness in our workforce system while also strengthening relationships with WIOA and JVSG 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. Development of this system is currently underway and involves providers in the development and testing of the new system. These efforts will continue.

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 Education, Training, and Upskill Committee, and the Business Development Committee. All four 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 includes 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.
- Education, Training, and Upskill Committee
 - The Education, Training, and Upskill Committee strategizes about the development and maintenance of the state's workforce needs. The committee performs outreach and partners with education and industry to create employer-specific workforce pipelines.
- Business Development Committee:
 - When new and existing organizations plan to expand operations in Montana, the Business Development Committee provides industry-specific workforce expertise. It advises various stakeholders on sound workforce proposals and opportunities that positively impact business development in coordination with state, federal, and private partners.

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 understands that coordination across partners is critical in the implementation of a fully integrated public workforce and talent development system. Statewide leadership, guidance, and collaboration established the foundation of an integrated system, and 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.

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/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 incumbent worker training (IWT) and HELP-Link (a state workforce program for SNAP/TANF 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:

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

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

B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

Describe how the activities identified in (A) will be aligned with programs and activities provided by 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 coordinates workforce, secondary education, and postsecondary education systems across the state. Programmatic alignment, as required by WIOA and Perkins, is a priority for the Governor. He convened a group of cabinet-level, elected, and appointed representatives to discuss program alignment and define specific targets and goals for workforce and education programs. Montana aligns workforce and education programs by coordinating and promoting an understanding of agency LMI, and mapping credential and degree attainment related to high-skill, high-wage, and in-demand occupations. Much of the planning and alignment took place throughout the Perkins V planning process to ensure that both WIOA and Perkins programs were complimentary to each other.

WIOA core partners, in conjunction with OCHE, developed a dashboard to help Perkins-receiving institutions align career and technical education programs (CTE) with regional workforce demand. The dashboard was a direct response to Perkins V requirements for CTE program design. It is external-facing and will also help WIOA service providers assist clients with career exploration and training.

MTDLI also conducted a series of stakeholder engagement sessions in the fall of 2023 to solicit input from WIOA stakeholders across the state on implementation of WIOA and how to coordinate across core and other programs. Questions at these sessions included ways to best coordinate services and ways to minimize duplicative activities. Topics for future iterations of these sessions include JVSG and the program's intentions and eligibility requirements, and processes related to the implementation of the CONNECT referral system- which will support electronic referrals between core partners, education partners, the new SNAP/TANF provider for Montana, and other partner programs including JVSG, SCSEP program providers, and a range of mental health, substance abuse, and other supportive organizations already utilizing the tool.

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

Due to Montana's tight labor market, employer engagement between education and workforce programs continues to grow as more employers are seeking access to LMI to help develop

innovative ways to meet their worker challenges. Work-based learning (WBL) models and integrating WBL into CTE programs across the state allows educators, students, and employers new ways to engage and learn on jobsites and in the classroom. Montana continues to develop guidance for educators and employers on WBL models and design meaningful experiences for students and adult learners. Growth in this area and training for core and other optional partners reflects meaningful coordination between programs at the state and local level. In addition, titles I and II are coordinating services for career coaches and business engagement specialists, respectively to build synergies between the two teams to minimize duplication of services and more efficiently connect workers to in-demand jobs and employers seeking a skilled workforce.

Montana received federal funding for the PROWD grant awards to support apprenticeship training for individuals returning to local communities from federal custody. This will require coordination with local pre-releases, Montana Department of Justice, Montana Department of Corrections, local businesses who sponsor apprentices, and community organizations who work with offenders returning to local communities, such as housing organizations and drug treatment/rehabilitation facilities. Montana has applied for a similar award under USDOL/ETA's Pathways Home 5 program to serve individuals returning from state facilities to local communities which will focus on individuals 18-24, women, and American Indian populations, and will refer to WIOA programs and partners in mental health and substance abuse, and union and registered apprenticeship training programs.

The SWIB supports and requires meaningful coordination of services and education partners to develop a well-trained workforce and ensure the state continues to grow economically. To that end, the SWIB funded an update to information and results published in the "Meeting State Worker Demand: A Report on the Labor Market Outcomes for Montana Colleges" report. The updated report is available at:

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

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 and training development system.

Given Montana's small population and limited resources, it is necessary to coordinate services across partners to effectively serve all Montanans interacting with the public 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
- Connect the state's LVER with core and other partners in order to train partners on program goals, eligibility, and referral processes;
- Seek opportunities to strengthen local partnerships with education, industry, economic development, local government, and other stakeholders to ensure services offered through the One-Stop system are meeting the local workforce needs.

As stated above, in addition to coordination across WIOA partners, 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 partners utilized the elements of a changing workforce landscape to restructure service delivery to business and employers, reinventing collaboration to better support local and statewide workforce development. MTDLI led the way during this restructure, realigning to be nimble and responsive to emerging needs. MTDLI's Workforce Services Division reorganized bureaus and workgroups significantly. Integrated services for business were considered and bureaus were reconfigured to provide a higher level of cross-department collaboration, intentional outreach, and service delivery.

Three bureaus within the Workforce Services Division provide three unique types of workforce development services. The Job Service Operations Bureau (with 17 local offices embedded in communities across the state) provides front line services that connect job seekers and employers, provides WIOA job training, supports business through Rapid Response services, and helps businesses navigate employment regulations. The bureau engages at the local level with local WIOA partners, education, Native American tribes, and local business and officials. These partners network consistently to coordinate services in local communities and regions.

The DO Bureau supports assesses and analyzes programmatic data to optimize performance and service delivery. This bureau provides quality labor market information to statewide entities and WIOA providers, which helps decisions makers assess Montana's economic needs. This bureau supports WIOA providers across the state with information on industry projections for workforce through a comprehensive data platform that tracks WIOA participants' services and outcomes.

The Business and Education Engagement Bureau brings together employers, educational institutions, and agencies to strengthen the state's workforce. This bureau includes MRAP, the Jobs for Montana Graduates program, veteran's services, Montana Career Information System, and a newly formed business engagement team. The collaboration between these programs engages employers to create jobs and innovative job training opportunities for students, adults, and veterans, connects education to industry to create robust and effective training programs, and helps build a stronger, better trained workforce to support and grow Montana's economy. Integrated collaboration with all WIOA partners is crucial. This strategy helps bring together participants from every demographic in Montana to access these opportunities and connect to employment.

COORDINATION:

Collaboration between these three bureaus leverages the very best resources for business, networking a broad spectrum of state agencies, other statewide WIOA partners, and economic development groups. Specific attention is given to ensuring that silos are removed. Cross training and work group updates are consistently provided. Montana will continue to build on its successes with sector partnerships and coordinated engagement by expanding relationships with business associations, chambers of commerce, local industries, economic development entities, education systems, and additional statewide and local partners to ensure the services provided within the public workforce system support talent recruitment, development, and retention across the state.

The state promotes community colleges, two-year colleges, tribal colleges, and the university system as essential local and regional suppliers of Montana's trained workforce. Increased industry-led training is proving successful, helping to shape new and more effective training models. These innovative programs are completed at lower costs and in less time with better industry-aligned outcomes. This is essential to filling workforce needs in a timely manner. Employers find this to be an effective conduit for recruitment and retention. Collaboration between all WIOA partners in this effort helps to fill the training cohorts and provide wrap-around support for individuals entering or re-entering the workforce.

JVSG INTEGRATION AT JOB SERVICE MONTANA OFFICES:

The Jobs for Veterans State Grants (JVSG) program is a combined plan partner program. The program's dedicated staff provides individualized career and training-related services to eligible veterans and eligible persons with significant barriers to employment. The Disabled Veteran's Outreach Program (DVOP) representative assists veterans with significant barriers to employment, including those experiencing homelessness as well as vocational rehabilitation clients. DVOPs provide a range of services including career planning and counseling and comprehensive outreach to locate veterans in need of individualized services based on the NVTI case management approach.

LVER staff work closely with our Business Services Teams to promote the hiring of veterans to private and public employers. During these outreach visits, the LVER and the Business Service Teams inform employers about the JVSG program, and LVER and DVOP services. This joint effort opens the door to the LVER to work with employers on the creation of potential veteran employment opportunities. All JSM staff partners are informed of DVOP and LVER services through frequent office training sessions.

To meet the specific needs of veterans, particularly veterans with barriers to employment, DVOP/ LVER, JSM staff and other MTDLI business service teams are thoroughly familiar with the full range of job development services and training programs available at One-Stop Career Centers and Department of Veterans' Affairs Vocational Rehabilitation and Employment Program locations. With a focus on priority of service, the JVSG staff collaborates with WIOA providers across the state to ensure a full scope of services are available to veterans.

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;
- Collaboration among WIOA core partners, OCHE, and industry representatives to navigate the current landscape of certifications across the state and ensure that training 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. The state of Montana recognizes workforce training and talent development will ensure Montana continues to prosper and have a talented, trained, and educated workforce.

F. 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.

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.

Montana has recently launched a collaborative relationship with Education Design Lab (<https://eddesignlab.org/>). This partnership—"Year to Career"—will connect the MUS, employers, students, and WIOA titles I, II, and III partners in developing a series of micro-pathways in some of Montana's most in-demand employment sectors including information technology, allied health, construction, advanced manufacturing, and agriculture technology. Some pathways will lead to an associate degree, while others will be shorter paths to an industry-specific credential. The program will serve as a compliment to the MUS's other programs and will serve as an additional venue for workforce training opportunities for WIOA clients.

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 through a grant from the U.S. Department of Labor Employment and Training Administration. The data provided is produced by the Bureau's cooperative programs with the Bureau of Labor Statistics (BLS) as well as other data sources, such as the U.S. Census Bureau, BEA, and administrative programs.

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 Data and Operations Bureau's Occupational Employment Statistics 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 MWorks system. The system sunset in the fall of 2023 and will be replaced by an integrated system currently in development. The new system will streamline data collection, analysis, and reporting. WIOA programs under Title II collect client data using the MACS system and data under Title IV is collected using the WellSky system. 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 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: <http://dphhs.mt.gov/detd/vocrehab>.

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

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

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 Triage form. The triage form is located at the front counter at all Job Service Montana locations. Staff have been trained to request completion of the triage form 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 (mt.gov)

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 Title I and Wagner-Peyser programs, as well as the following:

- Trade Adjustment Assistance;
- Work Opportunity Tax Credit;
- Montana Registered Apprenticeship Program;
- State Displaced Homemaker;
- Migrant and Seasonal Farmworker;
- Senior Community Services Employment Program (SCSEP);
- Federal Bonding;

- Montana's Incumbent Worker Program;
- Jobs for Montana's Graduates;
- Reemployment Services and Eligibility Assessment (RESEA);
- Medicaid Expansion Workforce Program (HELP Link);
- Labor Market Information;
- Jobs for Veterans State Grant Program (JVSG);
- The Job Service Operations Bureau;
- The Business Engagement and Education Bureau;
- State Approving Agency (for GI Bill); and
- American Rescue Plan Act (ARPA)-related 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://swib.mt.gov/2024_FebOrgChart_Bureaus.pdf

The organizational chart for MTDLI's Workforce Services Division (WSD) can be found at: <https://swib.mt.gov/wsd-mar-2024-org-chart.pdf>

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>.

Montana's Office of Public Instruction administers the Adult Education Program. The Adult Education program manager is a SWIB designee for the Superintendent of Public Instruction. The agency is also a signatory partner of the state's One-Stop Delivery System's Memorandum of Understanding and Consortium Agreement, supporting the state's one-stop system. WIOA Title II programs use the MACS system to implement and track programs and services.

The organizational chart for OPI and Adult Education is found at:
<https://opi.mt.gov/Portals/182/OPI%20Organizational%20Chart.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 GovernorDesignee: Dylan Klapmeier	GovernorMontana Office of the GovernorPO Box 200801; Helena, MT 59620-0801	Term Expires: January 2, 2025
Paul Hopfauf Chair Business Representative	Director of Strategic Planning & Growth Montana-Dakota Utilities 318 Sunset Avenue; Glendive, MT 59330	Term Expires: June 30, 2024
Dean Bentley Vice-Chair	HR Generalist and Labor Relations Analyst Northwestern Energy	Term Expires: June 30, 2024

Greg Gianforte GovernorDesignee: Dylan Klapmeier	GovernorMontana Office of the GovernorPO Box 200801; Helena, MT 59620-0801	Term Expires: January 2, 2025
Business Representative	40 East Broadway Street; Butte, MT 59701	
Kerri Seekins-Crowe Legislative Representative	State Representative Montana House of Representatives 480 Pinon Drive; Billings, MT 59105-2742	Term Expires: January 1, 2025
Mark Noland Legislative Representative	State Senator Montana Senate PO Box 1852; Big Fork, MT 59911- 1852	Term Expires: January 2, 2027
Elsie Arntzen Core Partner (Title II)	Superintendent Montana Office of Public Instruction PO Box 202501; Helena, MT 59620	Term Expires: January 2, 2025
Sarah Swanson Core Partner (Titles I and III)	Commissioner Montana Department of Labor & Industry PO Box 1728; Helena, MT 59624- 1728	Term Expires: January 2, 2025
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: January 2, 2025
Mary Armstrong Local Elected Official	County Commissioner Valley County, Montana 501 Court Square #1; Glasgow, MT 59230	Term Expires: June 30, 2024
Mike McGinley Local Elected Officer	County Commissioner Beaverhead County, Montana	Term Expires: June 30, 2025

Greg Gianforte GovernorDesignee: Dylan Klapmeier	GovernorMontana Office of the GovernorPO Box 200801; Helena, MT 59620-0801	Term Expires: January 2, 2025
	2 South Pacific Street, Suite #4; Dillon, MT 59725	
Amber Terry Small Business Representative	Owner Central Machine and Ag Repair, LLC 29 Macnamara Street; Big Sandy, MT 59520	Term Expires: June 30, 2025
Adam Gilbertson Business Representative	Vice President RDO Equipment Company 5221 Midland Road; Billings, MT 59101	Term Expires: June 30, 2024
Shane Etzwiler Business Representative	President / CEO Great Falls Area Chamber of Commerce 100 1st Avenue North; Great Falls, MT 59401	Term Expires: June 30, 2025
Jason Palin Business Representative	Vice President Sibanye-Stillwater 1600 E 1st Avenue South; Columbus, MT 59019	Term Expires: June 30, 2024
Deborah Poteet Business Representative	Owner Poteet Construction 104 Apple House Lane; Missoula, MT 59802	Term Expires: June 30, 2025
Paddy Fleming Business Representative	Executive Director Montana Manufacturing Extension Center 2310 University Way Building 2, Suite 1; Bozeman, MT 59717	Term Expires: June 30, 2024

Greg Gianforte GovernorDesignee: Dylan Klapmeier	GovernorMontana Office of the GovernorPO Box 200801; Helena, MT 59620-0801	Term Expires: January 2, 2025
Heather O'Hara Business Representative	Vice President Montana Hospital Association 2625 Winne Avenue; Helena, MT 59601	Term Expires: June 30, 2024
David Smith Business Representative	Executive Director Montana Contractors' Association 1717 11th Avenue; Helena, MT 59601	Term Expires: June 30, 2024
Bo Bruinsma Workforce Member	Career Outreach Director Billings Public Schools 501 Custer Avenue; Billings, MT 59101	Term Expires: June 30, 2024
Dale Carpenter Workforce Member	Training Director Montana Sheet Metal Workers State JATC 104 Technology Way; Butte, MT 59701	Term Expires: June 30, 2025
Quinton Queer Workforce Member	President Plumbers, Local 41 45 E Silver Street; Butte, MT 59701	Term Expires: June 30, 2024
Jim Wonnacott Workforce Member	President/Apprenticeship & Training Coordinator Ironworkers Local 732 2 Oak Avenue; East Helena, MT 59635	Term Expires: June 30, 2024

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 pilot phase 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. In the past the state utilized a quarterly report, shared with the SWIB, that included data on participant outcomes and costs per participant. Those reports were inadequate in providing effective analysis as the data was derived from PIRL reporting of exiter data. MTDLI chose to discontinue its use of those reports in 2022. Instead, MTDLI uses 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.

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, 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

For each four-year state plan and state plan modification, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle), in accordance with methods described in 4(A). Describe how the State is adapting its strategies based on these assessments.

During the development and pilot phase of the dashboards, MTDLI does not have previous assessment results to share. Dashboard data currently presented by JSM office includes the number of job seeker clients, the number of business clients, RESEA program activity, WIOA and partner program enrollments (including job training and support service activity), and Rapid Response intensive career services. MTDLI tentatively plans to use these types of parameters in its future assessments. At this time, the dashboard remains under review by the SWIB for its effectiveness and viability as a permanent tool for assessing performance and the effectiveness of WIOA core and partner programs.

The dashboard can be found at: <https://swib.mt.gov/board-member-resources/data-dashboards/swib-dashboard>

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

Registered Apprenticeship Program Report 2023 (lmi.mt.gov)

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-and-Studies/MTCollgeReport2022.pdf

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

e) The DO Bureau is currently partnering with the Minneapolis Federal Reserve Bank to conduct an impact evaluation of service delivery strategies used in the RESEA program. In this evaluation, a RCT approach is being used. MTDLI will continue to produce evaluations such as those previously described and expand into implementation analyses to inform improved strategies for service delivery. Consultation with the SWIB, partners at MTDLI, and other core program partners will guide decision making for focal points of evaluative efforts. Future efforts will be used to ensure that the activities performed under WIOA at MTDLI will help Montana businesses and the citizens who participate in the program.

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, which is part of MACo district 9. Local area 2 consists of the remainder of the state of Montana. WIOA funding for the adult and youth programs is allocated to each area based on the following formula:

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

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 request for proposal (RFP) process.

WIOA dislocated worker funds are contracted by the SWIB to one service provider selected through a formal RFP 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: <https://wsd.dli.mt.gov/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: <https://wsd.dli.mt.gov/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 of Montana answered **sections i and ii** as a combined response.

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 Request for Proposal (RFP) 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 electronic procurement system will be used to manage the RFP competition 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 RFP 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 RFP competition was conducted spring 2022. The next WIOA Title II RFP 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 **sections i and 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 MWorks system. This system sunset in the fall of 2023. It’s replacement workforce case management system is in development with an expected launch date of early fall 2024. This system is being built on ServiceNow which will equip the agency to more readily connect with partner systems. WIOA programs under Title II collect client data using the MACS system and data under Title IV is collected using the WellSky system. Each program’s client data is tracked individually in each system during the client’s participation period. Any performance reporting unique to a specific program are handled within the program’s relevant system.

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

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

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

Looking ahead, Montana has begun transitioning data to Snowflake—the state's chosen cloud data management solution. Agencies are working in partnership with the Department of Administration's Chief Data Office to transition data to this cloud-based tool. The transition will simplify data storage, sharing, and analytics for the state and will minimize the need for complex data matching and transformation strategies for WIOA partners' disparate datasets. 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 will increase the agency's capabilities with data collection, validation, analysis, and reporting—all of which will help 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.

Montana is also in early phases of transitioning to 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 analysis data sharing and program evaluation.

Legislation passed during Montana's 2023 state legislative session also mandated the development of a statewide 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.

Data for titles I and III has been incorporated into the new architecture as of April 2024, and data for titles II and IV will be transitioned in future phases of the project, with efforts for title II already starting as part of a data modernization project underway. Once all data is in the new architecture, the ability to track participants across programs can be realized.

Finally, Montana is working to facilitate more coordinated intake efforts through adoption of the CONNECT referral tool. This will allow any core partner to refer clients to other core partners or other partners, assuring a soft handoff for intake and co-enrollment across programs.

Because core programs are administered in 3 different agencies working out of different locations and different providers, and utilize 3 different data systems which are not fully integrated, fully streamlined intake is not yet possible. The state is exploring options to increase this though, including adding kiosks into JSM locations that will connect users to all 3 core programs. 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 its legacy workforce system, MWorks. The state extracts and cleans data collected in MWorks on a quarterly and annual basis to produce all required financial reports, and the full PIRL, in compliance with WIOA Section 116. As part of continuous efforts to better align with WIOA, Montana also began work on building a new integrated workforce case management system during program year 2023. The new system will fully support 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, 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 also sends records to the SWIS system and creates PIRL reports to gather complete nationwide wage data.

The DO Bureau stores quarterly wage files on secure servers meeting federal confidentiality standards. Experienced DO staff utilizes statistical software such as SAS or R to match wage records to person records using 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 program and maintain confidentiality.

Quarterly wage files are also used in the quarterly performance reporting process. The wage data is loaded into a SQL database specifically created for the PIRL process. Reportable participants in the PIRL are matched against wage records using SSNs and the information is summarized as program participant outcomes for the WIOA Eligible Training Provider List (ETPL) PIRL reports. 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 ETPL PIRL.

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 is currently working with JSM to evaluate the Reemployment Services and Eligibility Assessment (RESEA) program using a RCT. The RCT will use 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 an 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 a triage 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:
 1. Missing in action;
 2. Captured in the line of duty by a hostile force; or
 3. 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 triage self-assessment priority of service questions from field staff;
- Providing updated Triage Form 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 VETS – Initial Assessment (Triage Form) is completed by non-JVSG staff to determine a job seeker’s eligibility for JVSG employment services.

MTDLI uses the Triage Form 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 Triage Form is completed using the most current guidance of eligibility as provided by Veterans’ Program Letters from USDOL, identifying eligible veterans and eligible persons having Significant Barriers to Employment (SBE) 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.

Montana certifies its One-Stop system no less than once every three years. The certification includes scoring on universal accessibility and outreach to populations with barriers to employment. Montana's One-Stop Certification Policy: <https://wsd.dli.mt.gov/wsd-policy>

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 ADA Checklist for Existing Facilities. The 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

Disability Employment and Transitions Division, 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.

The state of Montana's goals and vision are centered around continuous development of an aligned, accessible, and accountable public workforce and talent development system. Coordination and planning across core programs and other partners occur at the state level, and additional collaboration and coordination happen at the local level with core and community-based partners. Statewide leadership and strategic partnerships are the foundation of an integrated public workforce and talent development system, and the state of Montana intends to build on that foundation by implementing the following strategies:

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

Data Alignment

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

Cross Training Across Partners

Montana will continue providing training opportunities at the state and local level for partners to learn about partner programs and how the programs can collaborate to best serve clients in the public workforce and training system. Cross training will build a better understanding of partner programs and allow for seamless service delivery across partners and ensure that programs aren't duplicating efforts. Recent cross-training efforts between Adult Education, VRBS, and JSM offices provided better understanding of core programs, and building on these will allow partners to establish common regional goals and strengthen relationships with other partners to better meet regional economic needs.

Coordinated and Strategic Business Engagement

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

- A. Expand opportunities for partner-coordinated stakeholder engagement, soliciting input from business about local and statewide workforce needs;
- B. Grow sector strategies and partnerships at the state and regional level to identify skills, credentials, and education required for occupations within sectors; and
- C. Work collaboratively across partners to identify education and training partners that can work with clients to develop the skills and attain the training necessary to succeed in the workforce.

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

The State Plan must include	Include
Unemployment Insurance Agency if such official(s) is a member of the State Board;	
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);	Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes
8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;	Yes
9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;	Yes
10. The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);	Yes
11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and	Yes
12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or	Yes

The State Plan must include	Include
delivery of programs or services funded directly, in whole or in part, by the Department of Labor.	

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 tri-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 required 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 designated the entire state as one planning region.

Through integrated partnerships with business, education, community leadership, and workforce programs, Montana core partners participate in Community Management Teams (CMTs), which serve as the state's local workforce organizations. Montana currently has 10 active CMTs, originally developed as a group of one-stop partners, community members, local businesses, economic development representatives, and other community-based partners. The groups elect officers and meet on a monthly or quarterly basis. The CMTs identify community needs and plan workforce development and partner services to meet the community's specific needs.

To meet regional workforce needs, Montana allocates funding using 12 areas outlined by the Montana Association of Counties (MACo). County commissioners and other local leaders are encouraged to participate on CMTs to safeguard local workforce needs and promote community understanding.

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:

- o The State Plan;
- o The cost allocation methodology or methodologies proposed by the partners to be used in determining the proportionate share;
- o The proposed amounts or budget to fund infrastructure costs;
- o The amount of partner funds included;
- o 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);
- o Any proposed or agreed on AJC budgets (for individual centers or a network of centers); and
- o Any partially agreed upon, proposed, or draft IFAs.
- o 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:

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

Step 4: IFA Execution: The IFA becomes effective as of the date of signing by the final signatory. Programs may appeal the Governor's determination of the infrastructure cost contributions in accordance with the process established under 20 CFR 678.750, 34 CFR 361.750, and 34 463.750.

2. STATEWIDE ACTIVITIES

A. PROVIDE STATE POLICIES 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 here: <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.

During the current fiscal year, the Governor dedicated set-aside funding to modernize the case management and data collection system for Title I and III programs. Investment in this infrastructure is critical to continued operation of Montana's workforce programs, while improving the state's IT systems is a priority of the Gianforte Administration. This system will allow for the development of better data collection, improving WIOA reporting outcomes and leading to higher-quality evaluations of the WIOA programs. Montana intends to use the improved data from this system to provide better feedback to WIOA providers on client outcomes, allowing for better understanding of performance metrics and the ability for providers to adjust and improve outcomes. WIOA program evaluation is conducted by MTDLI's high-quality economist unit.

After the IT system is fully developed, the set-aside funding will be used to fund other initiatives of the Governor, including the funding of pilot programs and local initiatives in the workforce space, designed for the long-term improvement of workforce training systems.

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 those 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. 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).

Montana is in the process of developing a new client and business MIS. The continuing eligibility and renewal process will be defined based on the business processes and functionality in the new system, which has an anticipated launch date of August 2024.

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.

The following types of training providers can apply to receive WIOA Title funds to provide training:

- a) Institutions of higher education that provide a program of training that leads to recognized postsecondary credential;
- b) Entities that carry out programs registered under the National Apprenticeship Act;
- c) Public or private training providers, including community-based organizations, joint labor management organizations, pre-apprenticeship programs, and occupational or technical training; and
- d) Providers of adult education and literacy activities provided in combination with occupational skills training.

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. The public and service providers can view the application for initial eligibility at <https://montanaworks.gov/training>. The instructions for returning the application direct the service provider to return it to MTDLI. An accompanying W-9 also must be submitted to MTDLI. Applications will be reviewed by the agency to determine eligibility.

Approved training providers applying for continued program eligibility must provide the following verifiable, program-specific annual performance information.

- a) The total number of participants who received training services through a WIOA title I core program;
- b) The total number of participants who exited from training services;
- c) The average cost per participant for the participants who received training services; and
- d) The number of participants with barriers to employment served by the WIOA Title I core programs; and

1. The levels of performance achieved for all individuals engaging in the program of study (or the equivalent), specifically:

- a) The percentage of individuals who are in unsubsidized employment during the second quarter after exit from the program;
- b) The percentage of individuals who are in unsubsidized employment during the fourth quarter after exit from the program;
- c) The median earnings of individuals who are in unsubsidized employment during the second quarter after exit from the program;
- d) The percentage of individuals who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent during participation in or within 1 year after exit from the program.

2. The total number of individuals exiting from the program of study (or the equivalent).

MTDLI's ETPL Policy provides all WIOA requirements, including TEGL 8-19 and Change 1. It includes initial eligibility and continued eligibility policy and processes. The policy can be found at <https://wsd.dli.mt.gov/wsd-policy>. In addition, MTDLI contacts and sends a letter to Registered Apprenticeship sponsors, informing them of the opportunity to opt in on the WIOA ETPL.

Montana is currently undergoing a transition to make all applications available and submittable via a digital format across all state agencies. In the interim, a copy of the ETPL application is available at <https://montanaworks.gov/training> along with the email submission location. Once the digitized submission version is available, it will be available in the same location here: <https://montanaworks.gov/training>.

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>. Adult Priority of Service for individualized career services and training services is outlined below:

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.
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 or 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 AWARDED 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 RFP 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 RFP 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:

- a) attending secondary school by paying tuition for dual-credit courses that aren't covered by the One-Two-Free dual enrollment program; and
- b) 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. 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.

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.

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).)

1. MTDLI received no public comment.

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.

7. 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 2024 and 2025. 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. To maximize resources available for direct service delivery, 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.

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 17 JSM offices serve as the state's American Job Centers offering the full range of workforce development services.

The SWIB was in place prior to the inception of WIOA and its current membership aligns with WIOA's statutorily prescribed composition. This includes a majority representing private business and others representing workforce and education, core partners, labor, and elected officials. Additionally, Montana's education policy is aligned with state and workforce development goals. This single statewide planning area structure allows Montana to continue successful policies and operations that maximize cooperation, engagement, and service delivery.

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. Additionally, it allows the state to continue to serve at least the same number of customers of all types, despite reduced and/or level funding over recent years.

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

The current board membership does include local elected officials from opposite ends of Montana (Beaverhead County and Valley County). These two counties are nearly 500 miles and eight hours apart with different employment and industry needs. 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 served on the SWIB and continue to serve.

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 2024 and 2025. 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 15 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.

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 17 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, despite reduced and/or level funding over recent years.

A 30-day public comment period was provided by including this waiver as part of Montana's WIOA Combined State Plan that was posted for public comment and noticed to interested parties such as all SWIB members, the SWIB Interested Persons list, the Montana Association of Counties, the Montana League of Cities and Towns, local elected officials, service providers, organized labor, and other partners of the workforce system. 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 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 2024 and 2025.

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.

Montana's Governor has reinvigorated a focus to repairing the disconnect between employers and educators, creating sustainable public-private partnerships to create direct to industry workforce pipelines where workers are needed the most. The Governor's Build Montana initiative recognizes that career and technical education (CTE) personalized to each student provides not only the technical skills for occupational advancement but also a vision for the student(s) of what a successful career in industry can mean for the student. Local school boards of trustees in Montana have broad powers to declare flexible course equivalencies and free student seat time in favor of work-based learning opportunities leading to industry credentialed learning.

The above waiver request will result in increased partnership and collaboration between WIOA core partners, the MUS, and the SWIB.

The State of Montana is committed to alleviating barriers to employment. Under the Build Montana initiative, we are designing a public workforce and talent development system which is programmatically and physically accessible to all Montanans.

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 2024 and 2025. The coordination of these two waivers will expand Montana's ability to serve more of Montana's ISY.

According to the U.S. Department of Labor FY 2022-2026 Strategic Plan, the above waiver request will help fulfill the mission of USDOL: "To foster, promote, and develop the welfare of the wage earners, job seekers, and retirees, of the United States; improve working conditions; advance opportunities for profitable employment; and assure work-related benefits and rights." The waiver request specifically relates to Goal 1; Build Opportunity and Equity for All.

Montana has under-performed with youth performance indicators, for multiple quarters, due in part to the rural nature of the state and the inability of youth providers to enroll more ISY in our geographically isolated communities. 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.

Currently, the State tracks WIOA youth expenditures and performance quarterly through MWorks. Our new workforce client management system, to be launched in fall of 2024 will replace this current system, and will expand our performance analytics capabilities). Should

any area or provider be identified as underperforming following a quarterly review, technical assistance will be immediately provided.

Goal: Provide more support to an increased number of in-School Youth

The flexibility of the ISY Waiver would allow WIOA Youth providers to enroll more ISY clients without considering the 25% limitations on funding that is in place now. Enrolling more clients who are attending high school gives the ISY improved chances of planning or reaching their career or educational goals. Often, ISY are choosing to not establish an educational or employment goal due to the lack of financial support available to them.

Funding flexibility will also allow for continued support to clients' post-high school or for those currently attending post-secondary education or skills trainings. This includes costs that may be incurred beyond what PELL or other educational grants/scholarships may provide. Approval of this waiver will allow WIOA youth providers:

- To provide additional services such as Work Experiences, Supportive Services and Skills Training that would better prepare clients for entering the workforce upon completion of secondary school;
- To provide support for clients already enrolled in post-secondary schooling or skills training by helping with training costs, tuition, books etc., and supportive services to aide in completion of their planned training;
- Allow for support in assisting clients with transitioning to post-secondary training and or skills training while still attending high school to get a running start on their educational plan or to assist with employment opportunities upon completion of high school;
- To provide more assistance with job training, skills training and supportive services that will benefit clients that are in need and have no other resources available.

Montana is experiencing an increased demand for assistance from potential clients who are struggling with finding a job and need assistance with basic needs such as: rent, gas money, clothing for school/work or educational costs.

Goal: Improved flexibility of state, local and statewide activities funding to best meet the needs of our citizens and businesses.

Expected Outcome: Approval of this waiver will allow the opportunity to provide more in-school youth with innovative strategies to address barriers, student retention, engagement, transition, and successful outcomes.

Provide greater opportunity for more youth to complete high school and continue toward multiple career and educational opportunities, including apprenticeship programs, short-term certificates, associate or bachelor's degrees, and sustainable employment.

WIOA encourages strong partnerships to leverage resources and increase opportunities for youth. In the past year, Montana has appointed a Director of Strategic Engagement for WIOA titles I and III and a Montana Ready Coordinator for title II to better align education and workforce and encourage employer-specific workforce pipelines. Additionally, input and implementation will be in coordination with the state's education system, including MUS. The focus is to 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.

If the waiver is approved, anticipated beneficiaries include Montana's low-income, at-risk youth, young adult population, and subcontracted WIOA youth service provider staff, workforce development partners, American Job Centers (AJC), parents, teachers, and school counselors and Montana employers/business/industry.

- A formal monitoring will be conducted by the entity designated by the SWIB.
- WSD's Fiscal and Reporting Analysts will collect, analyze, and provide quarterly data and expenditure reports on the status of WIOA youth expenditures. The program manager will examine the effectiveness of this waiver through quarterly desk reviews and provide technical assistance to case managers as needed.
- 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.

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

The State of Montana is requesting a waiver to allow Montana's WIOA youth service providers to use Individual Training Accounts (ITAs) for in-school youth ages 16-21. The waiver impacts WIOA regulation 20 CFR 681.550 which prohibits youth providers from establishing Individual Training Accounts (ITAs) for WIOA in-school youth. According to current WIOA regulations, ITAs are established on behalf of eligible clients to pay for approved training services. Currently, only out-of-school youth (ages 16 – 24) can utilize ITAs. 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 MUS One-Two-Free Program. If a student is interested, they can currently take two free courses through the MUS. Upon successful completion, a student can then take additional courses at 50% the cost two-year resident tuition. This will help meet the Governor's goals of "providing our next generation with high-quality education and empowering our workforce with the skills they need to thrive" for PY24 and PY25.

A lack of coordination with the SWIB, to work collaboratively with core and other agency partners to ensure all state and federal resources are available to Montanans who wish to achieve their educational and career goals, may have been a previous barrier. With a reengaged SWIB, it has been determined through board and committee involvement that a reinvention of youth funds can benefit Montana's in-school youth by braiding funds to allow students the ability to earn an industry recognized credential, through multiple funding sources at the same time as they graduate from high school. This collaboration will also benefit retention, graduation, and credential rates throughout both rural and urban communities.

The Governor's vision for the Build Montana initiative is driving sustainable public-private sector partnerships to create direct-to-industry workforce pipelines where workers are needed the most. The Governor's Build Montana initiative recognizes that career and technical education (CTE) personalized to each student gives them the technical skills for occupational advancement and a vision of what a successful career in industry can provide for the student. 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.

In addition to ongoing efforts to engage partners and provide meaningful training and collaboration opportunities the Montana is focusing on collaborative projects to better serve customers across the state, including:

- Coordinating with industry, education, and workforce partners to understand and map credentials across agencies.
- Coordinating with industry, education, and workforce partners to understand and map credentials across agencies.
- Developing a state-wide work-based learning collaborative to better align opportunities across various state and local entities to streamline data, funding, and programmatic resources to benefit various educational opportunities; including but not limited to, on-the-job training, apprenticeships, stackable credentials, and degree programs.

Currently, the State of Montana provides minimal state-funded, post-secondary assistance directly to students. However, MUS has offered two free college dual enrollment (DE) courses to eligible students since 2018. During the 2021-2022 academic year alone, 6,578 high school students in Montana took college credit. After taking two free courses, high school students are charged half-price tuition, which is \$55/credit hour. MUS estimates that students have had a 93% cost savings compared to the 4-year tuition in Montana. Notable highlights of the program include:

- 60% of students who take dual enrollment credits enroll in an MUS institution within 2 years.
- DE students have on average a .6 higher GPA.
- DE students have a 15% higher retention rate.
- DE students have 8.5% higher graduation rates.

According to WIOA title II, Adult Education, high school graduation rate has been trending at roughly 86% percent for over four years. With this waiver, in-school youth (ages 16-21) can take advantage of adding to the number of subsidized courses, toward the goal of industry recognized certifications. MUS currently has 145 certifications. With these combined programs, a student could earn a full credential or complete many of the courses necessary, through the combined funding streams of One-Two-Free and WIOA Youth.

This waiver request is consistent with the Governor's priority to provide our next generation with a high-quality education and to empower our workforce with the skills they need to thrive. Specific to this broad goal, the Governor is working to align workforce and education programs with goals of student matriculation into careers, college, or credential programs, improving access to education opportunities for Montana students. The Governor also prioritizes trades education to ensure Montana employers have a highly skilled workforce. The above waiver request will result in increased partnership and collaboration among WIOA core partners, the MUS, and the SWIB.

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.

Montana is requesting the following waivers to this statutory and regulatory provision:

1. A waiver of the requirement to expend 75 percent of funding on the OSY population. Montana is requesting that this percentage be lowered to 50 percent.
2. A waiver of the requirement that local funding meets the 75 percent minimum expenditure requirement. Montana requests that this percentage be lowered to 50 percent to align with the statewide target (see #1 above).
3. A waiver of the requirement to expend 75 percent of Statewide Activities funding on the OSY population. It is requested to reduce this percentage to 50 percent to allow flexibility of funding special projects that meet the vision and mission of the state.

The coordination of these two waivers will allow for flexibility to serve Montana students, especially in rural areas.

According to the U.S. Department of Labor FY2022-2026 Strategic Plan, the above waiver request will help fulfill the mission of USDOL: "To foster, promote, and develop the welfare of the wage earners, job seekers, and retirees, of the United States; improve working conditions; advance opportunities for profitable employment; and assure work-related benefits and rights." The waiver request is specifically related to Goal 1; Build Opportunity and Equity for All. This goal focuses on ETA 1.1: "Create customer-focused workforce solutions that serve all workers, including underserved communities." The combination of both waivers requested will help to provide credentialing opportunities to secondary students entering the workforce, especially in more rural communities in Montana. As previously stated, Montana has performed below negotiated youth performance metrics for multiple quarters. The above requested waivers address Montana's identified barriers of reaching more in-school youth, to assist with ensuring timely and successful graduation, retention with employment after 2nd quarter and 4th quarter, the credential attainment rate, and measurable skill gain. Service providers would have the flexibility to expend more funding toward qualifying in-school youth, if applicable, but successful providers may continue to serve clients in-school or out-of-school.

Statewide implementation will begin when the waiver is approved. The State of Montana anticipates having a steady increase of enrollments over the next program years with the approval of this waiver. Through this waiver, in-school youth have the potential to obtain dual credit for both secondary and post-secondary course completion that will help improve Montana's performance by obtaining credentials, measurable skills gains, and ultimately employment and wage gains.

Top solutions from the 2020 Montana Chamber of Commerce Workforce Development survey are as follows:

1. 80% agreed that school districts should be incentivized to put equal emphasis on all career pathways.
2. 80% agreed that school districts should be required to incorporate workforce readiness skills in their curriculum.
3. 77% agreed that career advising in middle and high school needs to be strengthened.
4. 73% agreed that business and economics education should be required in middle and high school.

Other top solutions include:

5. Increased support for education and skill-attainment programs for adults;
6. Require science, technology, engineering, and math (STEM) education in 6-12 grades;
7. Create more registered apprenticeship programs;
8. Increase support for government-funded workforce training centers;
9. Promote policies to lower housing costs;
10. Provide financial aid incentives for students in high-demand fields; and
11. Increase support for government-funded childcare;

Items 1, 2, 3, 5, and 10 are partially addressed with this waiver request, allowing more funding opportunities to students and their career aspirations.

Goal: Increase services to youth in our local schools and communities, despite their educational status to earn industry recognized credentials alongside high school diplomas.

Expected Outcome: Approval of this waiver request will allow the state to balance the focus of funds and services on engaging in-school youth to persist in their educational goals through additional dual enrollment opportunities. Ultimately, the goal is for in-school youth to earn an industry recognized credential alongside their high school diploma. It is much more cost-effective to keep youth enrolled in school and engaged in a career pathway, and in the long run, will support attainment of quality jobs in in-demand careers.

Goal: Supporting students in school through successful graduation and transition into post-secondary education and employment.

Expected Outcome: Approval of this waiver will provide greater opportunity for youth to complete high school and continue on a pathway toward multiple career and educational opportunities, including but not limited to apprenticeship programs, short-term certificates, associate or bachelor's degrees, and sustainable employment.

Goal: Improved flexibility of state, local and statewide activities funding to best meet the needs of our citizens and businesses.

Expected Outcome: Approval of this waiver will allow Montana to implement innovative strategies to address barriers facing at-risk youth on an individualized basis and encourage innovative strategies to address student retention, engagement, transition, and successful outcomes. This waiver will also improve students' ability to align career goals with stackable credentials to meet industry-driven demands for workers.

WIOA encourages strong partnerships to leverage resources and increase opportunities for youth. In the past year, Montana's newly appointed Director of Strategic Engagement for WIOA title I and III and the Montana Ready Coordinator for WIOA title II will better align education and workforce to encourage employer-specific workforce pipelines. Additionally, input and implementation will be in coordination with the state's education system, including MUS. The focus is to connect applicable state and local agency efforts to assist youth, including at-risk youth, in leveraging resources and aligning successful program models that lead to student persistence, retention, completion, career awareness, and employment opportunities.

Montana's low-income, at-risk youth, and adult population, JSM, and subcontracted service provider staff, Montana employers/business/industry, parents, teachers, and school counselors will benefit from the waiver, if approved.

- A formal monitoring will be conducted by the entity designated by the SWIB.

- The WIOA Title I youth program manager(s) will provide technical assistance to case managers.
- Service providers are required 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.

TITLE I-B ASSURANCES

The State Plan must include assurances that:

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

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

ADULT PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

- Credential Attainment Rate

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

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

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

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

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	71.0%	71.0%	71.0%	71.0%
Employment (Fourth Quarter After Exit)	69.0%	69.0%	69.0%	69.0%
Median Earnings (Second Quarter After Exit)	\$6,500	\$7,350	\$6,500	\$7,350
Credential Attainment Rate	53.0%	53.0%	53.0%	53.0%
Measurable Skill Gains	56.0%	56.0%	56.0%	56.0%

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

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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 2024 and 2025.

DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

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

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

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

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

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a

reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

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

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

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

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

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

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

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

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	75.0%	75.0%	75.0%	75.0%
Employment (Fourth Quarter After Exit)	73.0%	73.0%	73.0%	73.0%
Median Earnings (Second Quarter After Exit)	\$9,000	\$10,800	\$9,000	\$10,800
Credential Attainment Rate	57.0%	57.0%	57.0%	57.0%
Measurable Skill Gains	54.0%	50.0%	54.0%	50.0%
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 2024 and 2025.

YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

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

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not

required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

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

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

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	63.0%	63.0%	63.0%	63.0%
Employment (Fourth Quarter After Exit)	57.0%	58.6%	57.0%	58.6%
Median Earnings (Second Quarter After Exit)	\$3,400	\$4,100	\$3,400	\$4,100
Credential Attainment Rate	50.0%	30.0%	50.0%	34.0%
Measurable Skill Gains	50.0%	38.0%	50.0%	42.0%
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 2024 and 2025.

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 a 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.

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 2023 RESEA plan. Seventeen JSM offices located throughout the state, integrated innovative tools, and online platforms enhance the accessibility of RESEA Services. This includes virtual RESEA appointments, workshops, and interactive training modules providing clients with a convenient and efficient way to access MTDLI programs.

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, staff are also able to enroll all RESEA participants in the Wagner-Peyser program and make referrals to more intensive retraining programs such as the WIOA dislocated worker and adult programs or other state-operated programs.

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 results in reduced UI benefit durations.

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, focusing on identification of barriers, career and employment goals and the training needed to achieve long-term career success. The program also includes developing an understanding of the relationship between the local labor market and employment goals. Claimants may also receive comprehensive, specialized assessments and referrals to Adult Education, Job Corps, MRAP, or on-the-job training opportunities.

MTDLI continues to improve workforce and UI program integration. In October of 2023, 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.

Integration strategies include training Employment Services staff to complete UI claims intake and determination processes; additional training for RESEA staff on identifying UI eligibility issues; and strengthening coordination procedures for all JSM staff to ensure that individuals who seek UI claim assistance receive the best possible customer service.

D. DESCRIBE HOW THE STATE WILL USE W-P FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN W-P AND UI, AS APPROPRIATE INCLUDING THE FOLLOWING:

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 a 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 assure 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, assure 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 https://uicclaimant.mt.gov/TUP/Claimant/_/.

In Montana, UI claimants must meet ongoing job search requirements and eligibility guidelines detailed in the claimant handbook:

https://uid.dli.mt.gov/_docs/claims-processing/claimant-handbook.pdf

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 focuses 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 receive 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 farmworkers earn low wages based on various factors. In addition, many farmworker 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 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 farmworkers and /or their dependents under the NFJP grant per year. The total served in training and direct placement is just over 200 individuals. Migrant farmworkers, 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 farmworkers 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) GRANTEES, OTHER MSFW ORGANIZATIONS, EMPLOYER ORGANIZATIONS, AND STATE AND/OR FEDERAL AGENCY DATA SOURCES SUCH AS THE U.S. DEPARTMENT OF AGRICULTURE AND THE U.S. DEPARTMENT OF LABOR (DOL) EMPLOYMENT AND TRAINING ADMINISTRATION

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

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- 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 GRANTEES 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 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 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.

Incorporating information about the Complaint System and process into ABC Clinic events, presented annually to Montana employers, is another upcoming opportunity.

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. In the past two to three years, the JSM Bureau Chief authorized flexibility for JSM managers to allow flexible schedules for outreach staff. Changes in leadership necessitated conversations about whether these flexibilities are currently available. 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 trainings 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 MSFWs 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 requirement within a reasonable amount of time (sec 121(e)(3));	Yes
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	Yes
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers	Yes

The State Plan must include	Include
Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and	
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.

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

adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

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

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

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

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

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

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

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

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

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

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

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

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	67.0%	67.0%	67.0%	67.0%
Employment (Fourth Quarter After Exit)	65.0%	67.0%	65.0%	67.0%
Median Earnings (Second Quarter After Exit)	\$5,900	\$7,400	\$5,900	\$7,400
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹

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 2024 and 2025.

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

B. LOCAL ACTIVITIES

Describe how the 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—
 1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
 2. Is for the purpose of educational and career advancement.

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

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 RFP 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 gain, especially for individuals with low levels of literacy, will need to be provided. Programs will also need to make available data that demonstrate they have provided students 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 AE unit. Professional development activities will include face-to-face and virtual opportunities, so all staff will be able to participate in a variety of delivery modalities.

Providers will ensure that 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.

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

1. Education Partners;

2. One-Stop Partners;
3. Community-Based Organizations;
4. Employers.

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

Providers will ensure that the teaching staff 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 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.

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

Through ongoing labor market analysis, all providers will have an awareness of regional labor market needs to provide teachers with a working knowledge of regional career opportunities. Using current information provided by the MTDLI at <https://lmi.mt.gov/>, providers will ensure relevancy in the transfer of learning toward student career pathway goals. Providers must be able to disclose their methodology for ensuring that employer and labor market needs are helping drive their instructional practice.

Allocations for providers are awarded by a funding formula that recognizes the components of an effective AE program based on the WIOA Statewide Performance Report. Effective programs will be those that deliver instructional activities that support student transition to specific occupations or career clusters. Grant award preference is given to providers that demonstrate that instructional services are delivered cost-effectively to a reasonable number of students and that they can make themselves readily available to core partners for wrap-around services. Consortium applications are encouraged to assist providers in meeting the cost-benefit expectations and core partner collaboration. 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 for adult education and literacy activities and career pathways. Grant funds are awarded to any eligible provider that offers services to incarcerated or institutionalized individuals, 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.

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

The IELCE funds for sections 231 and/or 243 are awarded to eligible providers through a competitive application process outlined 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 access to employment and training services. The state will ensure eligible providers' integration of pathway instruction through a variety of funded activities.

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

Second, the state will support eligible providers' ability to integrate and sustain career pathways in their instructional practice. Funds will be available to support regional meetings with workforce and one-stop partners to help AE programs identify the components of job-driven training that need to be incorporated into their curriculum. Regional professional development will make use of leadership dollars to assist programs in learning how to become responsive to local labor market demands.

Third, the state will use funds to develop templates and identify resources that support a systemic approach to career pathways; technical assistance will be made available for providers on the use of state developed resources that will inform their pathway implementation. State leadership funds will establish high quality professional development to improve instruction in the essential components of reading instruction and research-based approaches related to the specific needs of adult learners. Leadership activities with essential components of reading focus will be used to create the foundation for adults to develop the skills needed to obtain high school equivalency, transition to postsecondary education, or enter the workforce. The state will contract with field and subject experts as needed 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 on promising instructional practices and effective instructional strategies. The state will use this information to disseminate information about models and promising practices related to the needs of adult learners. In programs where students readily make gains in reading, the state will support staff in the development of teacher lessons, resource links, and fund preparation for trainings to assist colleagues in successful reading instruction. The state will carefully monitor student data to see patterns on student transition to postsecondary, employment, and credential attainment. Programs that have data reflecting successful student exit trends 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 student access to education and training services is a priority. Technical assistance is available for programs in the use of technology, including digital technology and technology for system efficiencies.

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

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

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

In summary, the 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 in local provider in their program improvement plan. All AE staff will be required to participate in a minimum number of hours of professional development annually that is provided by the 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 an RFP 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 according to the state performance-based funding formula. Points are awarded for performance outcomes; programs not meeting outcomes will receive reductions in their allocation.

The quality of professional development is assessed with scrutiny similar to assessing the quality of local providers. The state uses a combination of program data and a statewide survey to determine professional development needs. Professional development providers and

activities are selected to meet the identified state needs. 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, 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
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

The State Plan must include	Include
8. The plan is the basis for State operation and administration of the program;	Yes

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM ASSURANCES

The State Plan must include assurances that:

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

AUTHORIZING OR CERTIFYING REPRESENTATIVE

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

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

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

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 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>)
2. Grants.gov - Certification Regarding Lobbying
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
3. SF LLL Form – Disclosure of Lobbying Activities (required, only if applicable)
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)

	Montana State Office of Public Instruction
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	Enter information in this column
First Name	Katie
Last Name	Madsen
Title	Adult Education State Director
Email	Katie.Madsen@mt.gov

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

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 OPI ensures equal access and participation in the SRCL project to all persons regardless of their gender, race, national origin, color, disability, or age. The Office of Public Instruction 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 OPI 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 child needs that result from a disability to enable the child to be involved in and make progress in the general education curriculum at the local level, as needed.

Standard testing accommodations will be made for identified students with disabilities at the local level, as needed.

The OPI Implementation Team will ensure schools 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 OPI Adult Education Unit 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 RFP 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.

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

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

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

- Credential Attainment Rate; and
- Measurable Skill Gains

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

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

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

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

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

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

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

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the

core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

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

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	60.0%	52.0%	60.0%	53.0%
Employment (Fourth Quarter After Exit)	58.0%	56.5%	58.0%	57.0%
Median Earnings (Second Quarter After Exit)	\$4,000	\$4,390	\$4,000	\$4,400
Credential Attainment Rate	40.0%	59.0%	40.0%	60.0%
Measurable Skill Gains	54.0%	54.0%	54.0%	55.0%
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 2024 and 2025.

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:

(A) is an independent State commission

(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.

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.

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 (JS)	10-21-2021
Client Assistance Program	2nd Term (KH)	4-17-2023
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	1st Term (CC)	1-1-2022
Community Rehabilitation Program Service Provider	1st Term (DM)	9-14-2022
Business, Industry, and Labor	1st Term (KJ)	9-14-2022
Business, Industry, and Labor	1st Term (MR)	1-1-2022
Business, Industry, and Labor	1st Term (CM)	9-14-2022
Business, Industry, and Labor	Vacant	NA
Disability Advocacy Groups	1st Term (LK)	1-1-2022
Disability Advocacy Groups	1st Term (MM)	4-01-2024
Section 121 Project Directors in the State (as applicable)	1st Term (JW)	9-14-2022

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
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 (JG)	10-20-2021
State Workforce Development Board	1st Term (JO)	4-1-2024
VR Agency Director (Ex Officio)	1st Term (CH)	04-01-2024
Current or Former Applicants for, or Recipients of, VR services	1st Term (BT)	10-21-2021
Current or Former Applicants for, or Recipients of, VR services	1st Term (BL)	4-17-2023
Current or Former Applicants for, or Recipients of, VR services	1st Term (TR)	4-17-2023
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

The SRC has a membership committee who is actively recruiting for the one Business, Industry, and Labor vacancy. The committee meets quarterly to discuss recruitment efforts and has developed materials on the SRC to disseminate to potential new members. At this time, the previous SWIB Director meets the definition of an appropriate person to fill the Business, Industry, and Labor is being pursued as an SRC member to fill the one vacant position. He has not yet submitted an application.

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.

The SRC continues to meet quarterly.

In 2023, meeting dates for the SRC were:

- **February 9, 2023 – virtual meeting**
- **May 10 & 11, 2023 - in Helena, MT**
- **August 10 & 11, 2023 - in Anaconda, MT**

- November 8 & 9, 2023 – in Butte, MT

In 2024, meeting dates for the SRC will be:

- February 8 & 9, 2024 – in Red Lodge, MT
- April 17 & 18, 2024 – in Missoula, MT
- August 15 & 16, 2024 - in Dillon, MT
- November 14 & 15, 2024 - in Bozeman, MT

The previous SILC representative on the SRC resigned their position prior to the 3rd quarterly meeting in 2023. A new SILC representative for the SRC has been identified and she has applied for Governor appointment.

The previous SWIB representative on the SRC was Montana's SWIB director. He resigned his position effective November 17, 2023. A new SWIB Director was appointed and started January 8, 2024 and plans to attend the first quarterly SRC meeting of 2024. She will need to complete the application to be formally appointed to the SRC.

The VR Agency Director is currently in the re-application process with the Governor's office for re-appointment.

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 VRBS 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 VRBS 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 VRBS 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 us to pursue further.

Of particular interest to the SRC members over the last couple of years due to extremely low response rates (ex. 4 total responses were collected in 2023), has been the Consumer Satisfaction Survey. Montana's SRC has a sub-committee assigned to overseeing the dissemination of the consumer satisfaction surveys and the data collected from VRBS participants. This sub-committee has worked closely with VRBS staff in recent years to generate and implement ideas to improve response rates. Those ideas have included re-writing and re-formatting the survey, utilizing a data collection platform, emailing the survey as opposed to mailing out paper surveys, and providing QR codes to access the survey instead of links among others. Despite best efforts, this has not proved overly successful. 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 the sub-committee has been actively engaged with VRBS staff to acquire a contractor through Sole Source procurement. It is possible the procurement method could change, but at this time, VRBS has identified a potential contractor that is believed to be uniquely qualified to perform this task.

In the 2023 SRC Annual Report, the following recommendations to VRBS were given:

1. **Maintain VRBS Technician positions within the program to assist with expediting the VRBS process from application to plan.**
2. **Develop advancement opportunities for VRBS Technicians to VRBS Counselor positions through mentorship, state agency support and private partnership opportunities.**
3. **Maximize VRBS Counselor retention by monitoring caseloads, paying attention to feedback, creating a flexible policy model, promoting communication and collaboration, and monitoring job satisfaction ratings and employee engagement.**
4. **Improve communication between VRBS staff, client, parents, case manager, instructors and other key players when case transfers occur to ensure client's engagement in the program is maintained.**
5. **Increase recruitment of qualified candidates to fill vacancies throughout the agency by establishing a recruitment strategy to help identify, hire, and retain employees and expand talent networks.**
6. **Increase referral and transition services among WIOA partners and other community programs to improve client services and program performance outcomes.**
7. **Improve focus on community partnerships to ensure that the diverse needs of the individual clients are met through wraparound coordinated services.**
8. **Consistently provide region/area specific resources to clients throughout all phases of the program from intake through exit.**
9. **Monitor Community Rehabilitation Providers' activities with VRBS clients and provide needed tools to increase the number of client successful closures annually.**

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. Maintain VRBS Technician positions within the program to assist with expediting the VRBS process from application to plan.
 - a. **VRBS Response: The 2023 Montana legislative body appropriated 4 FTE to support maintaining rehabilitation technician positions. VRBS is currently working with the department to fund 6 additional rehabilitation technicians through modified positions.**
2. Develop advancement opportunities for VRBS Technicians to VRBS Counselor positions through mentorship, state agency support and private partnership opportunities.
 - **VRBS Response: VRBS leadership is exploring the possibility of offering graduate level training for rehabilitation technicians to support advancement in the agency if interested. Additionally, a mentorship program for staff is being explored.**
3. Maximize VRBS Counselor retention by monitoring caseloads, paying attention to feedback, creating a flexible policy model, promoting communication and collaboration, and monitoring job satisfaction ratings and employee engagement.
 - a. **VRBS Response: These activities are currently underway within VRBS.**
4. Improve communication between VRBS staff, client, parents, case manager, instructors and other key players when case transfers occur to ensure client's engagement in the program is maintained.
 - a. **VRBS Response: The case transfer procedure is currently being updated. The updated version will be totally paperless and seamless using functionality in VRBS' case management system.**
5. Increase recruitment of qualified candidates to fill vacancies throughout the agency by establishing a recruitment strategy to help identify, hire, and retain employees and expand talent networks.
 - **VRBS Response: VRBS currently uses recruitment tools such as LinkedIn and Handshake to attract candidates from a wider national network in addition to recruitment strategies already in place. The agency is always looking to improve recruitment and retention strategies.**
6. Increase referral and transition services among WIOA partners and other community programs to improve client services and program performance outcomes.
 - a. **VRBS Response: VRBS co-hosted 7 WIOA Convenings across the state of Montana with Adult Education and Department of Labor over the summer of 2023 and talked to over 250 staff members employed by WIOA core**

partners. Additionally, local staff jointly developed stakeholder engagement plans to address improved performance measures across programs. In 2024 VRBS leadership will be monitoring progress on the local plans and hold local teams accountable. VRBS is also actively monitoring co-enrollment data.

7. Improve focus on community partnerships to ensure that the diverse needs of the individual clients are met through wraparound coordinated services.
 - a. **VRBS Response:** VRBS has a long history of community partnerships. This is an area of continuous improvement. For example, VRBS is currently prioritizing partnerships with mental health agencies in the following ways: expanding opportunities for individuals with serious mental illnesses to access Individual Placement and Support (IPS) programs, an evidence-based supported employment model developed for this population and working with the Montana State Hospital to ensure individuals interested in pursuing employment are enrolled in VRBS, assigned a rehabilitation counselor, and have initial appointments scheduled upon discharge.
8. Consistently provide region/area specific resources to clients throughout all phases of the program from intake through exit.
 - a. **VRBS Response:** VRBS has long history of providing regional resources to clients through all phases of the program and is continually seeking to improve and update resources. For example, Job Service staff hold offices hours at VRBS local office in Kalispell and utilize Microsoft Teams platform to co-manage cases that have co-enrolled participants.
9. Monitor Community Rehabilitation Providers' activities with VRBS clients and provide needed tools to increase the number of client successful closures annually.
 - a. **VRBS Response:** VRBS actively monitors CRP services to clients as prescribed by the contract agreements with the providers. Also, VRBS has incentivized high-quality outcomes by paying a higher successful outcome fee to Community Rehabilitation Providers when they assist a client to get employed at a job that pays at or over \$20 per hour, works 25 or more hours per week, and/or is offered employer paid benefits.

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.

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.

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 equity.

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 count of students with disabilities with IEPs declines with age, while the count 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 by 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 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.	<p>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> <p>1.2.2 Provide consistent benefits counseling services to more individuals, including those not yet employed.</p> <p>1.2.3 Explore how to make the Transportation Coordinator position best serve individuals needing transportation services.</p> <p>1.2.4 Explore and promote innovative, collaborative transportation service options, including volunteer programs.</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>

Objectives	Strategies	Basis
	<p>1.2.5 Analyze opportunities to increase access to driver's 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>	
1.3 Increase the percentage of VRBS clients employed, retained, and promoted in competitive, integrated jobs	<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 disabilities engaged in high quality Pre-ETS.	2.1.1 Continue to build relationships with statewide and local education entities to increase awareness and	C. Improve and expand VR services for students with disabilities, including the coordination of services

Objectives	Strategies	Basis
	<p>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>	<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>
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>	<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>

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.	<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>3.1.2 Analyze options to develop a coordinated, streamlined WIOA referral process.</p> <p>3.1.3 Hold regular collaboration meetings with partners, including a focus on partner and VRBS services and trainings.</p> <p>3.1.4 Continue to engage with Job Service Employers' Committees (JSEC) and Community Management Teams (CMTs) local committees.</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>
3.2 Enhance coordination with businesses/employers.	3.2.1 Provide increased training to employers to understand the benefits of hiring people with disabilities.	<p>B. Overcome barriers to accessing VR and supported employment services;</p> <p>D. Improve the performance</p>

Objectives	Strategies	Basis
	<p>3.2.2 Continue to manage collecting employer data in the Madison data system.</p> <p>3.2.3 Identify a solution for the VRBS counseling staff to follow through with business connections made through the business services team</p>	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.	4.1.1 Improve the onboarding and orientation process to integrate new hires into our organizational culture and	B. Overcome barriers to accessing VR and supported

Objectives	Strategies	Basis
	<p>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>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 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</p>

Objectives	Strategies	Basis
		assisting individuals with disabilities to achieve quality employment outcomes.
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>
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>

Objectives	Strategies	Basis
		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 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

The goals/priorities listed below are from the previous strategic plan that VRBS wrapped up at the end of 2023. As mentioned in c(1) above, a new strategic plan was developed in January 2024 and VRBS has just begun working on those updated goals and strategies and will report on them in the Modification report in 2026.

1. Access and Quality: Montanans with disabilities can access high-quality competitive, integrated employment.

Objectives	Strategies	2022 Progress	2023 Progress
1.1 Increase the number of clients served by VRBS.	<p>1.1.1 Reduce the waiting list and order of selection.</p> <p>1.1.2 Improve community outreach and encourage more people to apply for VRBS services.</p>	<p>Bureau Chief working to get a mental health liaison, TBI liaison, refugee liaison and Adult Ed liaison in each local office</p> <p>Each local office tasked with reaching out to 6 different agencies to</p>	<p>Category 2 opened August 10, 2022.</p> <p>Category 3 opened and waitlist cleared January 1, 2023. Moved from 178 applicants on 10/1/22 to 209 applicants on 8/1/23. Moved from 2486 in</p>

Objectives	Strategies	2022 Progress	2023 Progress
		present on VR and recruit referrals	IPEs on 10/1/22 to 2891 in IPEs on 8/1/23.
1.2 Increase the percentage of VRBS clients employed, retained, and promoted in competitive, integrated jobs.	<p>1.2.1 Continue to move people out of shelter and group placements into competitive, integrated employment.</p> <p>1.2.2 Eliminate sub-minimum wage jobs.</p> <p>1.2.3 Increase access to customized employment opportunities.</p> <p>1.2.4 Increase access to self-employment opportunities.</p> <p>1.2.5 Provide higher education, trade school, apprenticeship, and certificate program opportunities to assist with sustaining and/or advancing people with disabilities.</p> <p>1.2.6 Implement mechanisms for VRBS Counselors and Community Rehabilitation Providers (CRPs) to be more aware of the economy and labor market projections.</p> <p>1.2.7 Provide Benefits Counseling to clarify the impact of working on</p>	<p>Staff from UofM presented at All Staff in September on Self Employment modules and will present again in early 2022</p> <p>Business Services Specialist tracking self-employment cases/plans on spreadsheet</p> <p>Business Services Specialist encouraging self-employment team to participate in webinars from National Center on Self-Employment</p> <p>Multiple trainings on CE topics for VRBS staff and providers – 11/1 & 11/2 (MG&A retreat), 11/29, 12/3 and 12/14 (Documents of Discovery trainings)</p> <p>Planning for more Gateway Trainings in 2022OGSM developed for meeting with all individuals working in facilities and on crews to discuss community employment and/or retirement</p>	<p>VRBS continues contracting with CILs to complete CCIR annually. DDP and VRBS leadership working on learning Employment First.</p> <p>Self-Employment procedure was written and published in January 2023.</p> <p>Self-Employment team meets regularly to review, provide TA on, and approve business plans.</p> <p>1099 Self-Employment procedure to be reviewed by P&P team on 9-7-23.</p> <p>VRBS leadership met Healthcare Apprenticeship and Registered Apprenticeship. Registered Apprenticeship had a staff attend the Business Services Conference in Butte.</p> <p>Business Services Specialist working on new model for in-house training for providers in CE.</p>

Objectives	Strategies	2022 Progress	2023 Progress
	state and federal benefits.		<p>VRBS contracted with MSU-B to hire a benefits counselor to work with only VRBS clients. The benefits planner is now fully certified and taking referrals from VRBS using the procedure previously established.</p> <p>Transportation Coordinator just finished WIP-C training and took her certification test last week.</p>
1.3 Improve the quality of VRBS services.	<p>1.3.1 Provide high quality, holistic, long-term, relationship-based counseling services.</p> <p>1.3.2 Integrate counselors with the internal team structure of subject matter experts.</p>	<p>Assistive Technology (AT) Team sends out monthly newsletters to VRBS staff</p> <p>AT Team close to completing an AT assessment form for VRCs</p> <p>MonTECH presented at All Provider Call in August 2021</p> <p>ALL BLV staff are to actively participate in another team</p> <p>Deaf Services Program Manager joined Pre-ETS team and Pre-ETS team members joined Deaf and HOH team to better collaborate</p> <p>All Pre-ETS staff have a subject matter expert</p>	<p>AT Team meetings have vendors attend to discuss the technology they offer, the populations it could work best for, how it works, etc.</p> <p>MonTECH gave presentation at Disability Employment Conference to employers regarding AT that could be beneficial to their employees.</p> <p>Transportation Coordinator approached MonTECH about bringing on an OT that can do modified driving assessments.</p> <p>Leadership encouraging cross training and SMEs in offices that can assist with "specialized"</p>

Objectives	Strategies	2022 Progress	2023 Progress
		for: BLV, Deaf/HOH, Foster care youth, mental health, and addictions Business Services Specialist worked with MG&A in November to develop a fidelity scale for CE services	topics. Shawn now a VRC for Deaf clients. Collaborating with BHDD through ODEP's ASPIRE project to build capacity for IPS service delivery statewide
1.4 Increase the percentage of clients meeting and exceeding WIOA performance indicators.	1.4.1 Use measurable skill gains to increase quality of placements and outcomes. 1.4.2 Train counselors on measurable skill gains and regularly monitor their accuracy.	Published MSG procedure Developing an MSG Report in Madison to track and measure skills gains per counselor Training on MSG reporting occurred during Madison Go-Live Training (6/28-7/2) and refresher training held on 9/2/21	MSG Madison Chapter was re-written, and changes shared with field staff. MSGs - Ops Bureau Chief individually e-mails every counselor every quarter about their MSG rate with a reminder of what the statewide expected goal is for the Program Year (39%). Credential Attainment – Ops Bureau Chief has been steadily working on the credential attainment procedure and clarifying data reporting expectations to field

2. Youth Engagement: Montana youth with disabilities are effectively engaged in vocational exploration and work readiness training.

Objectives	Strategies	2022 Progress	2023 Progress
2.1 Increase the participation of students (14-21) with disabilities engaged in high quality Pre-ETS.	2.1.1 Build capacity in Pre-ETS programs to reach eligible students with disabilities statewide.	Developed outcome surveys for Pre-ETS clients Pre-ETS specialists now developing IPEs and managing cases for	Outreach with Shodair Children's Hospital, Yellowstone Academy, tribal schools, colleges, 121 programs etc. is ongoing. Roles and

Objectives	Strategies	2022 Progress	2023 Progress
	2.1.2 Expand outreach efforts to qualified students, their families, and schools.	student while they are in high school. After graduation, cases transfer to general VRC.	Responsibilities" document has been updated to reflect the opening of Category 2 and then 1.
	2.1.3 Improve application process to enroll students in Pre-ETS services.	Improved, more user-friendly student request forms developed and using DocuSign for ease of form completion	The "Pre-ETS Specialist's Role in IPE Development" has also been updated.
	2.1.4 Enhance collaboration and relationships between VR Counselors, Pre-ETS Specialists and students with disabilities.	Pre-ETS Specialists recently tasked with reaching out to all Home School Groups in their areas to improve participation of home-schooled youth	VR & Pre-ETS Bureau Chiefs meet regularly to discuss relationships and collaboration between VRCs and Pre-ETS Specialists and problem solve issues as they arise.
	2.1.5 Improve outcomes for students with disabilities as they transition out of Pre-ETS.	Pre-ETS has presented to OPI Special Education staff, Deaf/Blind Project, MT Empowerment Center, Hands and Voices, and 2021 MYT Conference	Student request forms were amended to add space for student to indicate if in foster care. DocuSign continues to be used for student request forms and applications.
		Pre-ETS received interest in new contracts this year from 5 schools that have not previously contracted	More Pre-ETS camps added in 2023 including: Starbase and Bloom. MYLF and Movin' On have continued.
		Ongoing - MYLF and Movin' On	Targeted attempts to establish vendors in Choteau.
		Hired a Pre-ETS Specialist in Havre	Pre-ETS Specialists provide services directly in areas where providers are not available.
			Efforts continually made to recruit new schools and tribal schools into Pre-ETS School Contracts. Mountain Home Missoula and Family Reunification Solutions

Objectives	Strategies	2022 Progress	2023 Progress
			(both new CRPs) are also interested in contracting for Pre-ETS

3. Equity: All people with disabilities are engaged and valued for their abilities and contributions to our workforce, with extra emphasis on reaching underserved and unserved populations.

Objectives	Strategies	2022 Progress	2023 Progress
3.1 Increase resources for people who are deaf or hearing impaired.	<p>3.1.1 Contract with additional qualified interpreters.</p> <p>3.1.2 Work to collaboratively start training programs for sign language interpreters.</p> <p>3.1.3 Enhance access to assistive technology.</p>	<p>Deaf Services Program Manager coordinating with MSDB Superintendent on options for sign-language interpreter education programs in MontanaDeaf Services Program Manager is testing non-physical interpreter options for VRBS clients</p>	<p>Options to use Sorenson interpreters via Zoom explored and implemented.</p> <p>AT Team meetings have vendors attend to discuss the technology they offer, the populations it could work best for, how it works, etc.Deaf Program Manager and MTAP director meeting quarterly to coordinate services</p>
3.2 Increase blind and low vision supports.	<p>3.2.1 Partner with doctors across the state to share resources and improve information access for the newly blind.</p> <p>3.2.2 Enhance access to assistive technology.</p>	<p>BLV Bureau Chief and BLV staff coordinating with Diabetic Retinopathy Project to identify people at earlier stages of vision loss for VR services and get training from them for staff</p> <p>Outreach to Northern Montana Vision Center in MarchBozeman Low Vision Center working more closely with Butte BLV staff</p>	<p>Ongoing outreach targeting vision clinics happeningAT Team meetings have vendors attend to discuss the technology they offer, the populations it could work best for, how it works, etc</p>
3.3 Increase resources and access to rural and migrant communities as well	3.3.1 Analyze and modify staffing to ensure highly trained, specialized staff are effectively supporting	REO presented on the Disability, Inclusion, and Equity panel for VRBS All Staff in May 2021	<p>Missoula coordinating with Soft Landings</p> <p>CSNA contractors held focus group with Soft</p>

Objectives	Strategies	2022 Progress	2023 Progress
as language minorities.	<p>rural, migrant, and language minorities.</p> <p>3.3.2 Conduct outreach to organizations working with people in language minorities in Montana.</p> <p>3.3.3 Improve outreach to rural communities.</p> <p>3.3.4 Enhance strategic partnerships to increase awareness of VRBS as an option for migrant and refugee workers.</p>	<p>4 VRBS staff attended National AgrAbility Conference 2021 held in Billings, MT</p> <p>Spanish versions of Pre-ETS student request form, application materials, and Great Falls referral list created</p> <p>New Pre-ETS contracts with rural (and reservation) schools</p>	<p>Landings</p> <p>VR Bureau Chief working with CSAVR folks to facilitate DIE presentation for VRBS staff.</p> <p>New Pre-ETS contracts with St Ignatius, Winifred and Grass Range among others.</p> <p>2 Pre-ETS camps for students in rural communities established in 2023 in Miles City and Lewistown.</p> <p>VR Bureau Chief recently reviewed Language Link procedure at supervisor meeting</p>
3.4 Increase collaboration with 121 programs and resources to American Indians on reservations and in urban settings.	<p>3.4.1 Increase outreach and communication with tribal partners, including 121 programs, health and human services providers, and high schools.</p> <p>3.4.2 Partner with tribal colleges.</p> <p>3.4.3 Build relationships with tribal businesses.</p>	<p>Tribal Liaison working intensively with CSKT 121 Program in transition to new program manager</p> <p>Quality Assurance Specialist assisted CSKT with developing a “training assignment” hiring agreement for new program manager</p> <p>Tribal Liaison planning to recruit new program manager of CSKT 121 to apply for SRC</p> <p>Tribal Liaison updated Cooperative Agreements with all 121 programs in</p>	<p>Program Supervisor continues to meet regularly with Carmelita from CSKT.</p> <p>BLV Bureau Chief regularly attends meetings with the Office of American Indian Health.</p> <p>Stephanie Iron Shooter presented at 2022 Annual All Staff in Havre.</p> <p>Data being gathered through CSNA process to determine how to improve partnerships with American Indians.</p>

Objectives	Strategies	2022 Progress	2023 Progress
		<p>Montana. They are pending approval with a goal of getting signatures by the end of the year.</p> <p>New Pre-ETS Specialist on the hi-line who will work to contract with more reservation schools</p> <p>Great Falls supervisors presented for Disability Awareness Day to the Blackfeet Manpower in Browning in October. OGSM regarding Little Shell that VR Leadership and staff are working on</p>	
3.5 Increase support for people with disabilities in institutional settings.	3.5.1 Enhance outreach and communication with institutions to increase awareness of and engagement with VRBS services.	<p>OGSM to engage in concerted effort to deliver transition services to youth in psychiatric residential facilities and therapeutic group homes</p> <p>OGSM to collaborate with Child and Family Services to identify and engage with youth who could benefit from VRBS</p>	<p>VRBS leadership met with Warm Springs leadership in spring 2023. Working to increase/coordinate referrals with goal to have eligibility and IPEs written prior to discharge.</p> <p>VRBS involved in DPHHS Olmstead Plan development</p> <p>Ongoing - Field offices tasked with identifying their local CHAFFE coordinator and CFS office and invite to staff meetings.</p>

Objectives	Strategies	2022 Progress	2023 Progress
3.6 Increase support for youth in foster placements.	<p>3.6.1 Actively work with Child and Family Services to identify and engage with youth who could benefit from VRBS.</p> <p>3.6.2 Enhance partnerships with schools, programs, and professionals serving homeless and at-risk youth.</p>	OGSM to collaborate with Child and Family Services to identify and engage with youth who could benefit from VRBS	Ongoing - Field offices tasked with identifying their local CHAFFE coordinator and CFS office and invite to staff meetings

4. Coordination: Montana's workforce system is coordinated to effectively support people with disabilities and their employers.

Objectives	Strategies	2022 Progress	2023 Progress
4.1 Increase coordination with partner organizations.	<p>4.1.1 Increase community awareness and understanding of VRBS.</p> <p>4.1.2 Develop and implement a partner engagement plan, inclusive of Job Services, SRC, tribal vocational rehabilitation programs, CRPs, Developmental Disabilities Program, Adult Education, community block grant programs, Temporary Assistance for Needy Families (TANF), and others.</p> <p>4.1.3 Increase coordination with Local Transportation Advisory Committees, Montana Transit</p>	<p>New transportation coordinator hired</p> <p>DDP/VRBS Joint Referral procedure published and monthly meetings with VRBS and DDP leadership</p> <p>Collaboration with Children's Mental Health and Foster Care/Homeless Youth and Diabetic Retinopathy</p> <p>Intensive collaboration with CSKT 121 program Bureau Chief and Program Manager working with IPS to facilitate a conference and expand IPS offerings</p>	<p>VRBS and DDP have good, well-established working relationship and are in process of implementing MOU.</p> <p>VRBS leadership as well as Medicaid and Mental Health leadership continue to work on expanding IPS.</p> <p>VRBS liaisons in each of the 9 local field offices for attendance at local TAC meetings.</p> <p>Transportation Coordinator participates in CARs committee annually, maintains relationships with MDT, and attends fall and spring MDT conferences.VRBS,</p>

Objectives	Strategies	2022 Progress	2023 Progress
	<p>Association, and other transportation stakeholders.</p> <p>4.1.4 Develop a community performance appraisal tool and baseline measures for co-enrolled participants.</p>		<p>Adult Education, and Workforce Services are holding local WIOA convenings in each area of the state to provide education and allow for local goal setting and planning</p>
4.2 Enhance coordination with businesses/employers.	<p>4.2.1 Increase awareness of VRBS with businesses and analyze options for improved information sharing.</p> <p>4.2.2 Coordinate business relationship management with partner organizations.</p> <p>4.2.3 Provide increased Windmills training to employers.</p> <p>4.2.4 Increase business representation on the SRC.</p>	<p>SRC working hard to recruit business representatives to the council</p> <p>Windmills Delivery procedure published February 2021</p> <p>VRBS facilitated Hearts of Glass viewing and panel discussion in October for National Disability Employment Awareness Month</p>	<p>First Annual VRBS hosted Disability Employment Awareness Conference held in May 2023.</p> <p>All business services team members are trained in Windmills and Windmills offerings are happening 1-2x per quarter. As of February 2023, all business seats on the SRC are filled</p>
4.3 Enhance eligibility and navigation processes for clients.	<p>4.3.1 Analyze options for a common intake process.</p> <p>4.3.2 Analyze options for tools and methods to share client information.</p>	<p>VRBS Leadership working on technical specifications for SARA to interface with Wellsky</p> <p>State Verification Exchange System (SVES) is approved for Montana VRBS. Long-term goal is to integrate SVES with</p>	<p>VRBS leadership working with DLI, Adult Ed, and SWIB to implement accountability measures on co-enrollment. Working on sharing co-enrollment data.</p> <p>VRBS, Adult Education, and Workforce Services are holding</p>

Objectives	Strategies	2022 Progress	2023 Progress
		<p>Wellsky</p> <p>Chaz Compton of TAC presented to all VRBS staff on eligibility and IPE developing with emphasis on rapid engagement</p>	<p>local WIOA convenings in each area of the state to provide education and allow for local goal setting and planning SVES implementation into Madison ongoing but getting closer.</p> <p>Local offices learning about CONNECT at WIOA Convenings</p>

5. Organizational Stability: VRBS is a stable, sustainable organization.

Objectives	Strategies	2022 Progress	2023 Progress
5.1 Increase fiscal stability.	<p>5.1.1 Improve Ticket to Work milestone payments collection process.</p> <p>5.1.2 Put internal controls in place for financial monitoring.</p>	<p>Three TTW procedures and internal controls published</p> <p>All Staff participated in financial audit training by Legislative Audit Division</p> <p>Open communication and responsive relationship with BFSD</p> <p>Mentoring relationship established with Public Health (Program 7) with budget analysts</p> <p>Operations Bureau Chief working with BFSD to write RSA-17 Procedures and Internal Controls</p> <p>All Staff participated in interactive training on Internal Controls</p> <p>Utilize fiscal liaison at RSA as needed</p>	<p>TTW processes continue per procedure.</p> <p>August 2022 to August 2023: \$1,645,504.83 in reimbursements.</p> <p>Procedure and Internal Control development, implementation, and monitoring are ongoing and continuous.</p> <p>Relationship between DETD Fiscal Unit and BFSD continues to be very good.</p>

Objectives	Strategies	2022 Progress	2023 Progress
		Ongoing work writing procedures and internal controls on various fiscal (OGSM) and program tasks	<p>DETD Fiscal Unit continues to utilize RSA fiscal liaison and VRTAC QM TA as needed.</p> <p>2019 Corrective Action Plan has been cleared!</p> <p>Procedures and Internal Controls accepted by RSA to date:</p> <ul style="list-style-type: none"> • Internal Control for General Cost Allocation and Personnel Cost Allocation • Rate Setting Methodology procedure • Procedure SF-425 for Supported Employment SE • Procedure SF-425 for Older Individuals Who Are Blind (OIB) • Procedure RSA-17 Reporting • Procedure General Cost Allocation and Personnel Cost Allocation Requirements

Objectives	Strategies	2022 Progress	2023 Progress
			<ul style="list-style-type: none"> • Procedure Period of Performance • Internal Control for Period of Performance • Pre-ETS Time Tracking Procedure • Internal Control on SF-425s for SE-A and SE-B
5.2 Increase staff professional development.	<p>5.2.1 Provide earlier Foundations training.</p> <p>5.2.2 Develop and implement approaches to keep up to date on changes.</p> <p>5.2.3 Provide ongoing, continuing education for staff.</p> <p>5.2.4 Develop system to track staff professional development.</p> <p>5.2.5 Conduct performance-based evaluations to support high quality work.</p> <p>5.2.6 Enhance CRP training.</p>	<p>Foundations facilitated in July and multiple times per year as needed</p> <p>All Staff participated in interactive training on Eligibility and IPE Development</p> <p>VRBS Leadership attended Change Management interactive training provided by consultant</p> <p>VRBS Leadership participated in Leadership Training provided by Dr. Fred MacFarland</p> <p>Providing mini-trainings to CRPs during monthly All Provider Calls on: DRM, labor market, MonTECH, and IPS</p> <p>Group case review held in Helena in September</p> <p>Counselor Supervisors do monthly targeted case reviews</p>	<p>Collaborative Safety implemented division wide.</p> <p>Talent platform for staff performance monitoring implemented statewide.</p> <p>Turnover in field offices has resulted in leadership overseeing cases and staff in the local offices.</p> <p>Case Management expectations procedures published.</p> <p>VRBS leadership and staff completed case reviews last week.</p> <p>Deputy Administrator and Pre-ETS Bureau Chief currently participating in NRLI. VR Bureau Chief, BLV Bureau Chief, Ops Bureau Chief, and DET Administrator have already completed NRLI.</p> <p>Transportation</p>

Objectives	Strategies	2022 Progress	2023 Progress
		<p>Performance Appraisals due the end of the year</p> <p>Started doing APIs on client benefit purchases</p>	<p>Coordinator just finished WIP-C training and took her certification test last week.</p> <p>Ongoing procedure development happening as well as follow-up coffee chats to review procedures and answer questions following publication.</p> <p>Training on SS Benefits provided at 2023 All Staff.</p> <p>RSA Dashboards regularly reviewed with staff. VRBS has contracted with Yang Tan Institute at Cornell University to provide training for CRPs. First training was provided in-person in September 2022 in Billings and Missoula. Monthly training sessions for providers have also been provided by Yang Tan since November 2022 and will continue through December 2023 per the current contract. VRBS added training requirements to CRP contracts and plans to move to requiring asynchronous training for all new CRP employees starting in the 2024 CRP contracts</p>

Objectives	Strategies	2022 Progress	2023 Progress
5.3 Increase staff engagement and satisfaction.	<p>5.3.1 Celebrate staff and team successes.</p> <p>5.3.2 Monitor workloads and determine need for work redistribution.</p> <p>5.3.3 Ensure staff have updated, adequate tools.</p> <p>5.3.4 Continually evaluate staff training needs and desires and develop training and career paths to support staff.</p> <p>5.3.5 Continually evaluate employee engagement and make management decisions based on evaluations.</p>	<p>VRBS Director working on OGSM on employee engagement with Director's Office</p> <p>Plan to again implement employee engagement survey previously used by VRBS</p> <p>Moved a VRC position from Butte to Bozeman</p> <p>Anticipate repurposing a position to a Bozeman Pre-ETS position when a vacancy becomes available</p> <p>Bozeman office is growing so they got a new office space</p> <p>Pre-ETS specialists have taken on more responsibilities by writing IPEs in each of the offices</p> <p>Approved to hire temp VR tech workers</p> <p>Miles City staff have been assisting with a lot of overflow work from the other offices including support staff duties and VRC case work</p> <p>Staff celebrations: Billings and Missoula VR success stories shared in leadership meetings, Wellsky Testers awarded Amazon gift cards and prizes, team selection of VRBS</p>	<p>All 10 VRT positions will remain filled for the time being</p> <p>Created Program Supervisor position in Ops Bureau & Deputy Division Administrator position.</p> <p>New staff spend 1 week in Missoula after hired for training in foundational areas of the job.</p> <p>Optional leadership book club held monthly.</p> <p>Leadership attended CSAVR in Bethesda, MD.</p> <p>3 VRCs attended national symposium for VRCs in Madison, WI.</p> <p>VRBS leadership worked closely with HR and Union to secure raises for VR professional staff. Additionally, DOA provided "bonuses" in May 2023 and 4% raises to all staff July 2023.</p> <p>Staff awards are given at Annual All Staff Training. In 2023, new award for "The Flash" given out. Plans for 2024 awards include 6 common performance measures and best E&E report for support staff.</p> <p>Team building exercise</p>

Objectives	Strategies	2022 Progress	2023 Progress
		mission/vision/values, emails to counselors and staff regarding TTW reimbursements, and case of the year will be showcased in December	<p>on Four Lenses held with Billings and Miles City staff.</p> <p>Celebrate VRT, administrative assistant, and VRC days annually.</p> <p>In process of writing JD and posting new Business Services Specialist position.</p> <p>VR Counselor position posted to work out of Polson, position will be double-filled until there is attrition in the Kalispell Office.</p> <p>VR Supervisor retreat scheduled for Aug 21 & 22</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 PY2022	Negotiated Level PY2022	Actual Level PY2022	Explanation for Discrepancies
Employment (second Quarter After Exit)	63.3%	54.6%	VRBS' negotiated level of 63.3% was an ambitious goal, given the legacy data system that it was calculated from was less reliable than the current data system and that the PY2021 Actual Levels of this measure was 23.7%. VRBS moved case management systems on 7-1-21, and with the new

Performance Indicator PY2022	Negotiated Level PY2022	Actual Level PY2022	Explanation for Discrepancies
			case management system, has greater visibility and reliability into the data calculations in this measure. Concentrated efforts are being made within VRBS to both 1) ensure the post-exit data remains accurate and 2) focus on high-quality and lasting employment outcomes when exiting our participants
Employment (Fourth Quarter After Exit)	45.5%	44.3%	VRBS was very close to meeting this performance measure in PY2022, only 1.2 points away. Additionally, the PY2021 Actual Level of this measure was 14.6%, so there has been tremendous improvement in PY2022. Concentrated efforts are being made within VRBS to both 1) ensure the post-exit data remains accurate and 2) focus on high-quality and lasting employment outcomes when exiting our participants
Median Earning (Second Quarter After Exit)	\$3775	\$3456	VRBS has analyzed this decline in median earnings and will continue to work on high quality employment outcomes in PY2024-2027 to reflect this work

Performance Indicator PY2022	Negotiated Level PY2022	Actual Level PY2022	Explanation for Discrepancies
Credential Attainment Rate	38.9%	26.4%	VRBS' analysis of this rate has revealed that staff were not properly inputting some of the data elements that go into this measure in PY2022, so VRBS does not believe this rate is a true reflection of the performance in Montana. In PYs 2024-2027, the data elements that comprise this calculation will be accurate.
Measurable Skill Gains	37.5%	55.3%	Met Negotiated Level
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 2022, a total of \$29,355 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.

Vocational Rehabilitation and Blind Services (VRBS) will continue to encumber Title VI, Part B funds on a fee-for service basis. When supported employment services exhaust Title VI, Part B funds, then Title I funds will be utilized to provide needed supported employment services. At this time and in recent years, this procedure has made it possible to provide all planned supported employment services for individuals receiving VRBS services. If in the future VRBS determines that there are inadequate funds to provide all needed supported employment services for individuals on the VRBS caseload then supported employment will be funded with Title I dollars.

In addition, VRBS prioritizes the use of supported employment models that maximize integration of persons with the most significant disabilities in real work sites, doing meaningful work. Most recently, VRBS 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 VRBS participants. Title VI funds will be used to purchase IPS services for these individuals.

VRBS has implemented and continues to refine the Customized Employment (CE) program to enhance competitive integrated employment opportunities for individuals with the most significant disabilities in Montana. At this time, VRBS continues to issue CE-specific contracts to providers in Montana who have employees with Discovery and/or Customized Job Development certifications from Marc Gold & Associates.

In the coming years, VRBS will implement a new, in-house Customized Employment training system based on the system implemented by the State of Minnesota, who has agreed to train Montana and assist with ACRE certification. Title VI funds may be used to purchase Customized Employment services for VRBS 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.

VRBS 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.

VRBS 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.

VRBS 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 VRBS 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 90 days 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 90 days 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) Waiver,
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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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)
Priority Category 1	2362	2362	\$4,429,000	0
Priority Category 2	1363	1363	\$2,556,000	0
Priority Category 3	262	262	\$429,000	0

B. SUPPORTED EMPLOYMENT PROGRAM.

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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	190	190	\$602,000	0
Priority Category 2	Not Served with Supported Employment	Not Served with Supported Employment	Not Served with Supported Employment	0
Priority Category 3	Not Served with Supported Employment	Not Served with Supported Employment	Not Served with Supported Employment	0

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 not implementing an order of selection and all eligible individuals will be served.

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—

A. THE JUSTIFICATION FOR THE ORDER

Montana's Vocational Rehabilitation and Blind Services program (VRBS) does not know if it will be able to serve all eligible individuals with the available resources; therefore, we have implemented an order of selection.

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

Priority Category One - Most Significantly Disabled (MSD): Eligible individuals with serious functional limitations in three or more functional capacities, and who will require multiple services over an extended period of time.

Priority Category Two- Significantly Disability (SD): Eligible individual(s) with serious functional limitations in one or more functional capacities, and who will require multiple services over an extended period of time. - OR - The individual is a recipient of Social Security Disability Benefits (SSDI) or Supplemental Security Income (SSI) as a result of disability or blindness.

Priority Category Three-Not Significantly Disabled (NSD): All other eligible individuals with disabilities.

Those individuals in Priority Category One will have the highest priority and will be served first, followed by individuals in Priority Category Two, and finally by those individuals in Priority Category Three. All individuals within a higher priority category will be served before any individual in the next lowest priority category. Regardless of which category closure scenario is in effect, eligible individuals will be released from the statewide waiting list first by priority category, most significant to least significant; and then by order of application date, oldest to newest.

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.

The VRBS administration, in consultation with the State Rehab Council, will determine when OOS what priority categories may be served. VRBS will continue to provide services to

individuals currently receiving services in an IPE in all open priority categories until it is projected resources are not sufficient to support more participants.

When OOS is in effect, counselors will continue to take applications and make eligibility determinations. If a priority category closes VRBS will provide all eligible individuals who are assigned a closed priority category 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. The information and referral information is provided to these individuals via a packet developed specifically for their local community.

VRBS will notify each individual determined eligible, in writing of:

- The priority categories
- The individual's assignment to a particular priority category classification
- Any reclassification of priority category assignment due to changes in the individual's circumstances, or due to any misclassifications
- The individual's right to appeal the category assignment; and
- 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.

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?

No.

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 statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness 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 statewideness, 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.

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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)	4	4	4
Program Managers (Independent Living, Deaf, Social Security, Transportation, Business Services)	6	6	6
Central Office Admin Support Staff	1.5	1.5	1.5
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	7	8	9
Rehabilitation Technicians	8	8	8
Orientation and Mobility Specialists	3	4	4
Vision Rehabilitation Therapists	4	5	5
Field Administrative Support	19	20	20
Technical Support (Budget Analyst, Business Analyst, Technology Assistant, Contract Specialist)	5	5	5

D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

As of January 1, 2024 VRBS served a total of 3537 clients with 31 Counselors and 13 Counselor Supervisors across the agency. The average caseload per Counselor is 88 and the average per Counselor Supervisor is 60.

E. PROJECTED NUMBER OF INDIVIDUALS TO BE SERVED IN 5 YEARS:

4,000

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.

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Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
Western Michigan University	Vision Rehabilitation Therapy	2	0
Western Michigan University	Orientation and Mobility Specialist	1	0
Utah State University	Rehabilitation Counseling	1	0
St Cloud University	Rehabilitation Counseling	4	0
George Washington University	Rehabilitation Counseling	4	1
Montana State University Billings	Rehabilitation Counseling	3	1
UMass Boston	Rehabilitation Counseling	1	1
Virginia Commonwealth University	Rehabilitation Counseling	3	0
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 VRBS 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. VRBS 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 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 VRBS 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 VRBS 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. Staff also have access to virtual training that has been customized to Montana through collaboration with the Interwork Institute at San Diego State and emphasize points of staff development important to VRBS including informed choice, ethical decision making and comprehensive assessment.

Additional staff training opportunities include access to continuing education through the VR-TACs, YesLMS courses and other training opportunities. VRBS 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. Yearly, VRBS 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 PARAPROFESSIONAL PERSONNEL ARE
ADEQUATELY TRAINED AND PREPARED, INCLUDING—

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

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 VRBS requires professional counseling and supervisory staff to have a master's degree in Rehabilitation Counseling. The Certified Rehabilitation Counselor credential is preferred. VRBS 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, VRBS 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. VRBS 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.

VRBS 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. VRBS applies for and has been granted continuing education credits for training and provides these continuing education credits to any qualified staff who attend. VRBS has also applied to 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 VRBS 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. VRBS 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. VRBS 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 VRBS 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.

VRBS 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 VRBS 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.

VRBS 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), VRBS and other agencies are currently planning joint transition panel presentations at the OPI Summer Institute and Montana Council for Exceptional Children Conference.

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.

VRBS 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 VRBS Vocational Rehabilitation Counselor assigned to each high school in Montana to ensure a smooth transition into adult services.

Each year, VRBS 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 VRBS 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 VRBS with the documentation of Pre-ETS services they are

providing to students with disabilities. VRBS offers this opportunity to all schools including those located in institutional settings, the juvenile justice system and the Department of Military Affairs.

Montana has been participating in a national grant with several other states and Utah State University to develop a Transition Readiness Toolkit (TRT). The TRT survey instruments will provide a way to measure the effectiveness of Pre-ETS services. Montana is piloting the TRT this year and will roll it out to schools and providers in the future.

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. Additionally, the Pre-ETS Bureau Chief has been asked to present at the Special Education Director's meetings during their Spring meeting for the past few years.

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. In a recent meeting with the new State Special Education Director, we discussed how to work together to provide cross training to our respective staff members to ensure that they were aware of the content of the MOU and available transition resources.

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 in the Office of Public Instruction (OPI) was vacant for an extended period of time so VRBS was unable to move forward in updating the formal interagency agreement with the state educational agency. The position was recently filled, and VRBS has already met with the new Director and OPI staff to work collaboratively on updating the Memorandum of Understanding (MOU) which expired in 2022.

The following is from the most recent MOU with OPI that details the technical assistance responsibilities of each agency. It includes suggested revisions for the current MOU that is in development.

- VRBS will provide consultation and technical assistance to assist LEAs in planning for the transition of students with disabilities from school to post-school activities including Pre-ETS.
- 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.
- VRBS 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 VRBS staff will be encouraged to collaborate through their Regional Youth Transition Committees and Comprehensive System of Personnel Development (CSPD) Meetings in planning and implementing efforts that are focused on the transition of students with disabilities.

- 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.
- VRBS will disseminate information about transition services, Pre-ETS, processes for outreach, VR eligibility, scope of VR services, effective practices, training opportunities, funding strategies, assistive technology, and other relevant topics.
- LEA and VRBS staff will inform each other about policies or procedural changes that may impact transition services.

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

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

1. VRBS and the units of the MUS maintain different requirements for determination of eligibility, documentation of disability, and the provision of services or accommodations. This MOU does not require either VRBS or MUS to alter its policies for providing services or supports, and this MOU is not to be used as a basis for determining eligibility for VRBS or MUS services.
2. The units of the MUS through the guidance of the OCHE are required to provide services and accommodations to VRBS' clients to the same extent as they are provided to other students with disabilities, in accordance with Montana state law, the Americans with Disabilities Act of 1990 (PL 101-336) and Section 504 of the Rehabilitation Act (PL 93-112, as amended).
3. VRBS is not prohibited in this agreement from contracting with units of the MUS to provide services or support for VRBS' clients beyond those required to assure equal access to equal educational opportunities.
4. The MOU will provide both parties with the opportunity to enhance communication and the exchange of information regarding services offered by VRBS and the various campuses of the MUS.
5. VRBS and the units of the MUS will work together to enhance cross-referrals of individuals with disabilities, as appropriate to each individual's needs. Personal information about the individual will not be shared without an appropriate release of information.
6. The MUS will not require students who have a disability to apply for VRBS before providing services or support. For students who have applied for VRBS, the MUS will not deny or delay the provision of services or support while VRBS is in the process of determining eligibility for services.
7. VRBS are provided pursuant to an individualized plan for employment (IPE) which is developed jointly by the rehabilitation counselor and the eligible individual. In those

situations where referral has been made to campus disability support services, the appropriate disability services staff may also be involved in helping to develop the IPE.

8. The VRBS' rehabilitation counselor and the MUS campus disability support services staff will respect the individual's right and responsibility to fully participate in all decisions regarding his or her vocational future. The IPE shall be developed and implemented in a manner that allows the individual an opportunity to exercise informed choice in selecting an employment outcome, the specific vocational rehabilitation services that are to be provided, the entity that will provide those services, and the methods that will be used to procure the vocational rehabilitation services.

The following is from the most recent MOU with OPI that details the transition planning responsibilities of each agency. It includes suggested revisions for the current MOU that is in development.

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

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

The following is from the most recent MOU with OPI that details the roles and responsibilities of each agency. It includes suggested revisions for the current MOU that is in development.

Joint Responsibilities of OPI and VRBS:

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

Responsibilities of OPI:

- OPI will facilitate and coordinate the smooth transition of students with disabilities from school to post-school employment-related activities, including working with VRBS to ensure the receipt of appropriate Pre-ETS, transition services, and competitive, integrated employment.
- OPI will host an Annual Joint Stakeholders meeting to network, collaborate, communicate and discuss issues regarding services for students and youth with disabilities.
- OPI will encourage LEAs to participate in local multi-agency Transition Team meetings.
- OPI will request that LEAs identify points of contact to work with the VRBS liaison assigned to each school.
- OPI will disseminate information regarding relevant training and workshops to VRBS including courses available through the Teacher Learning Hub.
- OPI will encourage LEAs to reach out to parents and students to make them aware of coordinated transition services and opportunities. Examples include the Montana Youth Leadership Forum (MYLF), MSUB Movin' On campus program, Rural On the Right Track

Pre-ETS Camps, Montana Youth Transitions Conference, and STARBASE STEM Careers Camps.

- OPI will encourage LEAs to provide relevant resource materials to stakeholders, parents, families, guardians and students relating to the provision of Pre-ETS and other transition services.
- The OPI Data Accountability Specialist will provide the most recent Special Education State Child Count data upon request. A data driven estimate of the number of students receiving 504 accommodations in the state will also be provided upon request. The OPI Annual Performance Report which includes exit data information for students with disabilities will be shared with VRBS.
- OPI will require LEAs who work with students with disabilities seeking subminimum wage employment to send documentation of transition services/Pre-ETS provided to VRBS within 30 days of service delivery.
- For students with disabilities seeking subminimum wage employment, OPI will require the LEA to provide documentation to VRBS of transition and Pre-ETS services they provided. Documentation will be provided to VRBS within 30 days of service delivery.
- For students with disabilities seeking subminimum wage employment, OPI will require the LEA to provide documentation to VRBS of the student's refusal to participate in transition services when this situation occurs.
- LEAs will be offered the opportunity to enter into a contract with VRBS to provide Pre-ETS to students with disabilities. LEAs will be provided funding based on the classification size of the school and the number of Pre-ETS Services provided each quarter according to the contract fee schedule. LEAs providing Pre-ETS through a VRBS contract will be responsible for securing parent/guardian signatures on student Pre-ETS requests granting permission for VRBS and LEAs to exchange information.
- OPI will teach LEAs to inform VRBS of students with disabilities who may be in need of transition or pre-employment services through VRBS. OPI will encourage LEAs to inform VRBS as soon as students with disabilities are identified as having a disability regardless of whether the student intends to apply for VRBS services.
- OPI shall encourage LEAs to inform VRBS of students with disabilities who are disconnected or in danger of dropping out.
- OPI shall encourage LEA staff to share transcripts or report cards and verification of high school graduation with VRBS when requested. (This information will only be requested for students who are receiving services under an IPE through VRBS).
- OPI shall provide technical assistance to LEAs concerning the provision of FAPE including the responsibility to provide assistive technology to assist with the education of students approaching transition to independent living and employment as appropriate.
- OPI shall assist LEAs with coordination of vocationally related services with VRBS for eligible students. Coordination should commence in the early stages of transition.

Vocationally related service coordination and corresponding agency responsibilities should be identified in the IEP and included on the student's IPE when appropriate.

- OPI shall encourage LEAs to inform VRBS of IEP meetings in advance to allow sufficient time for VRBS to participate, subject to parental approval. Development of vocational goals and objectives shall occur in collaboration with the IEP Team.
- OPI will identify needed Pre-ETS and transition services, to include as appropriate, a statement of interagency responsibilities or linkages with other entities (e.g. mental health agencies, Social Security Administration) beginning at age 14. OPI will encourage LEAs to work closely with VRBS to ensure that interested students with disabilities are identified and referred for Pre-ETS at an early age.
- LEAs are responsible for providing and paying for any transition service that is considered special education or related services necessary for ensuring a FAPE as required under IDEA. Special Education and related services similar to VR Services may include:
 - Interpreting services;
 - Psychological services;
 - Physical and occupational therapy;
 - Early identification and assessment of disabilities in children;
 - Counseling services, including rehabilitation counseling;
 - Orientation and mobility services;
 - Medical services for diagnostic or evaluation purposes;
 - Work experiences; and
 - Job coaching and support services.

Responsibilities of VRBS:

- VRBS Counselors and Pre-ETS Specialists will participate in the evaluation process of students who have applied for VRBS and subject to parental consent, in the development of IEPs for students with disabilities
- VRBS shall encourage former students who are still eligible for IDEA services to enroll again in school for further study and training to enhance their opportunities for employment. Such former students shall also be eligible for vocational rehabilitation services customarily provided by VRBS to adults over the age of 21.
- VRBS will provide assistive technology services relevant to functions outside those assistive technology services required to access the educational program.
- After the eligible individual exits the LEA, VRBS will continue to provide vocational services, i.e., vocational assessment, career exploration, job shadowing, vocational guidance and counseling, and other required services outlined in the IPE.

- VRBS will accept referral of students with disabilities during the transition planning process for the provision of Pre-ETS. Students are not required to apply for VRBS services to receive Pre-ETS.
- VRBS will provide consultation with LEA district staff on transition planning to prepare a student to move from school to work or post-secondary education in accordance with the student's unique needs as determined through the IEP process and provision of Pre-ETS.
- An IPE which is consistent with and which takes into consideration the eligible student's IEP, their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice will be developed within 90 days of the VRBS eligibility determination.
- Students with disabilities who apply for VRBS, are determined eligible and complete an IPE may receive services such as evaluation, career guidance and counseling, medical or psychological services, training, job development and placement services, rehabilitation technology or other services to help them enter and maintain employment.
- VRBS will provide or arrange for the provision of services required by the IPE goal, when the student has been determined eligible for VR and the services are specific to his/her employment outcome and are not services customarily provided to the student by the LEA under the IDEA.
- VRBS Staff will provide consultation to assist in the identification of eligible and potentially eligible students with disabilities and assessment of their individual needs for Pre-ETS.
- VRBS is responsible for providing information to parents and/or guardians, students and teachers regarding VR eligibility, vocational assessment for employment and postsecondary planning and the CAP.
- VRBS will offer students who wish to apply for VRBS the opportunity to complete and sign a VRBS application form. The student will provide access to available information necessary to determine eligibility and priority for services. Eligibility for VRBS will be determined within 60 days. Students who are only interested in Pre-ETS and do not wish to apply for VRBS services will be given the opportunity to complete and sign the Student Request Form. Verification of disability and student status will be included on the Student Request Form or provided by the student. For students under 18 years of age, the application and Request Form will be signed by a parent or guardian.
- VRBS will obtain written consent for the release of confidential information, pursuant to VRBS policy and procedures, federal and state laws and regulations regarding confidentiality.
- VRBS will share information regarding policies, procedures, guidelines, programs and services for the purpose of improving the access to, and availability of, transition services.
- VRBS will provide brochures and materials about the VR process and services to the LEAs for distribution to students, parents, legal guardians, teachers and others. VRBS

staff will also be available to provide information on changes in the law or VRBS policy regarding transition services.

- VRBS will promote employer participation in providing opportunities for work-based learning for students with disabilities.

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

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

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. It includes suggested revisions for the current MOU that is in development.

- VRBS 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 VRBS.
- 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 VRBS, eligibility requirements, application procedures and scope of services that may be provided to eligible and potentially eligible individuals.
- Students who wish to apply for VRBS services will be offered the opportunity to complete and sign a VRBS application form. The student will provide access to available information necessary to determine eligibility and priority for services. Eligibility for VRBS will be determined within 60 days. Students who are only interested in Pre-ETS

and do not wish to apply for VRBS services will complete and sign the Student Request Form. Verification of disability and student status will be included on the Student Request Form or provided by the student. For students under 18 years of age, the application and Request Form will be signed by a parent or guardian.

- OPI shall assist the LEAs with methods and procedures for outreach and identification of students and families who may benefit from VRBS. Assistance with the methods and procedures should include actions needed to engage those who are not aware of VRBS, including how the LEAs identify and work with transition aged students who may be in alternative high schools, residential facilities, or are incarcerated.
- VRBS will reach out to eligible and potentially eligible students with disabilities who are in need of transition services and Pre-ETS as early as possible through outreach activities such as information sharing at IEP's, transition planning meetings, career fairs, orientations, back to school nights, work with parent support groups, and other activities.
- VRBS Counselors 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. VRBS will also reach out to youth with disabilities who have dropped out of an education program or students who are at risk of dropping out of high school.
- VRBS will inform students with disabilities about the availability of and opportunities to exercise informed choice; including the availability of support services for individuals with the most significant disabilities who require assistance in exercising informed choice throughout the vocational rehabilitation process;
- The designated Pre-ETS Specialist will work closely with each LEA to coordinate, identify students and implement Pre-ETS. VRBS will provide the necessary forms and templates for required documentation including Student Request Forms for Pre-ETS.
- VRBS will work with the LEA to ensure collaboration between transition services provided under IDEA and the Pre-ETS provided by VRBS through direct provision of services or through contracts with LEAs and other providers.
- OPI will provide written guidance to LEAs that Pre-ETS funds can only be used to provide the required Pre-ETS to students with disabilities and that Pre-ETS funds are for additional services to students with disabilities, not to pay for the services required under the IDEA. OPI will continue to work with LEAs to ensure that they follow this guidance.
- Not all eligible or potentially eligible students with disabilities will require all five 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. It includes suggested revisions for the current MOU that is in development.

Coordination and Documentation for Subminimum Wage Employment (Section 511(d) of the Rehabilitation Act of 1973):

Under section 511 of Rehabilitation Act of 1973, no entity, including businesses which 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 participation in Transition or Pre-ETS, application for VRBS 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 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 VRBS 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 VRBS 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 VRBS; and (viii) Date and method (e.g., hand-delivered, faxed, mailed, e-mailed, etc.) by which document was transmitted to VRBS. The LEA Personnel must provide the documentation to VRBS 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(b)(2)(i). Extenuating circumstances should be interpreted narrowly to include unexpected lengthy absence 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(b)(2)(i)(B). When the LEA personnel transmits the final determination or activity completed to VRBS, 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 VRBS regarding that student.
- When a student refuses to participate in transition services, the LEA will provide VRBS with documentation of the refusal to participate. Pursuant to 34 CFR§397.30(b)(2) such documentation must at a minimum contain at a minimum 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 VRBS. The LEA must provide this documentation to VRBS within 5 calendar days of the youth's refusal to participate. 34 CFR § 397.30(b)(2)(ii).

- The LEA must retain a copy of all documentation provided to VRBS.
- The transmittal of all documentation from the LEA to VRBS 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 VRBS 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 VRBS 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 VRBS personnel necessary for the production of the documentation due to illness, family emergency or natural disaster. 34 CFR § 397.10(c)(2)(B).
 - The individual has received transition services under (IDEA) or Pre-ETS through VRBS or the LEA.
 - The individual has applied for VR services and been found ineligible; or applied and was found eligible for VR services and;
1. Had an IPE developed
 2. 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
 3. The individual's case is closed; and
 4. Has been provided career counseling, and 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)(i).
- 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.

VRBS contracts with LEAs to provide Pre-ETS to students with disabilities. The coordination and documentation requirements for students and youth with disabilities who are seeking subminimum wage employment is included in the current Pre-ETS School Contract as outlined below:

- The Contractor must provide additional documentation for students with disabilities who are known to be seeking subminimum wage employment. The documentation must at a minimum, contain the: (i) Youth's name; (ii) Description of the transition services under the Individuals with Disabilities Education Act (IDEA) and Pre-Employment Transition Services completed; (iii) Name of the provider of the required service or activity; (iv) Date required service or activity completed; v) Signature of school personnel documenting completion of the required service or activity; (vi) Date of signature described in paragraph and (vii) Signature of school personnel transmitting documentation to Vocational Rehabilitation and Blind Services (VRBS); and (viii) Date and method (e.g., hand-delivered, faxed, mailed, e-mailed, etc.) by which document was transmitted to the designated State unit. The school personnel must transmit the documentation required of this section to VRBS as soon as possible upon the completion of the required services, but no later than 30 calendar days after the completion of the service; or 60 calendar days, if additional time is necessary due to extenuating circumstances
- In the event a student with a disability or, as applicable, the youth's parent or guardian, refuses to participate in the Pre-Employment Transition Services, 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 school personnel documenting the youth's refusal; (v) Date of signatures; (vi) Signature of school personnel transmitting documentation of the refusal to the designated State unit; and (vii) Date and method (e.g., hand-delivered, faxed, mailed, e-mailed, etc.) by which documentation was was transmitted to VRBS. Documentation required when a youth has refused to participate in Pre-Employment Transition Services must be provided to VRBS within 5 calendar days of the youth's refusal to participate.
- When the school personnel transmit the last documentation to VRBS regarding the services provided to the student, the school personnel must provide a cover sheet that itemizes the documentation that has been provided to VRBS regarding that student. The educational agency must retain a copy of all documentation provided to VRBS.

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.

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.

VRBS 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.

VRBS provides multiple services to businesses across Montana. These services include Recruitment, Training, Retention, and Incentives.

Recruitment/Acquisition Services include accommodation services for employees, ADA Training, consultation and evaluation for employees; identify potential employees using multiple methods (eSkill that is employer specific, etc.); assisting with basic skill preparation for candidates through the use of WIOA partners (Adult Education, Job Service, etc.); Customized Training- train clients to meet industry standards through a variety of training situations; On-The-Job training; On-The-Job Evaluations; Apprenticeship; job description/essential functions of job; employee recruitment; Disability related policies/ handbook; Disability awareness/sensitivity training/ consultation. Other acquisition services include Work Opportunity Tax Credits, Federal bonding program, and Section 503 letters.

Disability Management Services involve providing accommodation/ergonomic training/consultation and referrals, ADA training/consultation and referral, ADA Accessibility guideline referral, Disability Awareness/Sensitivity Training, Job/Task Analysis, and Windmills.

Retention Services involve providing accommodation services for retention, ADA Training, Consultation, Job coaching for Retention, Other Retention Services, Vocational Counseling for Retention, and EOP (Emergency Operating Plan) for Retention.

All of these services are available to employers regardless of whether they are hiring VRBS clients or Pre-ETS students. Employer are an additional client of VRBS to help meet their workforce needs.

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;

Montana has attended the Agribility Conferences. Montana is actively involved in discussions with partners and stakeholders on the possibility of creating an Agribility program in Montana.

3. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH;

VRBS continually seeks opportunities for interagency cooperation with non-educational agencies serving out-of-school youth. While VRBS works closely with statewide workforce development system agencies to serve out-of-school youth, there are non-WIOA agency partnerships as well. The monthly VRBS Youth Services Team meetings routinely include presentations from different agencies that provide services to youth including out-of-school youth. VRBS is also partnering with Child Protective Services (CPS) and Chafee providers to reach foster care youth with disabilities. Together, VRBS and CFS are striving to achieve the goal of a 50% increase in the number of foster youths aged 14 and older participating in vocational rehabilitation services.

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 VRBS, 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 the following MOU between VRBS, Mental Health Block Grant (Prevention Bureau), and Medicaid (Treatment Bureau):

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 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 **VRBS** 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 VRBS 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, 2024.
- Create a VRBS IPS Leadership team.

- Meet quarterly to review this document and report on progress on the following dates:
 - November 24, 2023
 - February 23, 2024
 - May 24, 2024
 - August 23, 2024
- Participate in fidelity reviews.
- Collect data on number served and employment outcomes of those served by VRBS through an IPS program.

2.1.b VRBS contacts:

- Chanda Hermanson, DETD Administrator, 406-444-4179, Chanda.Hermanson@mt.gov
- Brook Hodge, Bureau Chief of Field Services, 406-214-4848, bhodge@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.
- As existing programs enhance their funding abilities through other means (VRBS & Medicaid & other grant opportunities), issue Request For Proposal (RFP) for unused block grant funds to create further IPS program implementation in Montana.
- Support 100% the cost of the IPS trainer starting FFY24 (10/1/2024-9/30/2025) and moving forward.
- Collect and process monthly invoices from MHBG-funded IPS Programs within 30 days of receipt.
- Collect and analyze quarterly data and outcomes for MHBG-funded IPS Programs.
- Use outcome data to improve best-practices for MHBG-funded IPS Programs.
- Utilize MHBG to garner one or two additional IPS Supported Employment sites in Montana.
- Conduct an annual site review at each of the MHBG-funded IPS Programs.

- Assist MHBG-funded IPS Programs to monitor their budget to successfully complete the fiscal year reasonably within their allocated funding/budget.
- Participate in fidelity reviews.

2.2.b BHDD-Prevention contacts:

- Rebecca De Camara, BHDD Administrator, rdecamara@mt.gov, 406-444-6951
- Jami Hansen, Prevention Bureau Chief, Jami.Hansen@mt.gov, 406-444-3055

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.

2.3.b BHDD-Treatment contacts:

- Rebecca De Camara, BHDD Administrator, rdecamara@mt.gov, 406-444-6951
- Isaac Coy, Treatment Bureau Chief, icoy@mt.gov, 406-444-7922

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.
- Join the International Learning Community for IPS and create a specialized and Montana-specific steering committee through Behavioral Health Advisory Committee (BHAC).
- 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:

- November 24, 2023
- February 23, 2024
- May 24, 2024
- August 23, 2024
- 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 VRBS' 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 one full-time or two part-time trainer positions staffed and sustainably funded.
- 3.3 Create clear funding tools for IPS Programs to navigate billing.
- 3.4 Collect and analyze baseline data of successful competitive integrated employment outcomes to monitor progress in 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 VRBS, BHDD-Prevention and BHDD-Treatment.

Section 4. Resolution of Conflict:

- 4.1 In the event that VRBS, 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, October 1, 2023 and shall terminate automatically, without notice to the other party, on September 30, 2025.
- 5.2 Any party may terminate this MOU with 30 days written notice to the other party.

Section 6. Modification:

- 6.1 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 and 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;

VRBS 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 VRBS and DDP to make available the required supported employment services continues to be ongoing.

Over the last few years, VRBS leadership has maintained a close working relationship with DDP leadership through monthly meetings. During those meetings, both agencies worked extensively to create a current, updated memorandum of understanding (MOU). Due to significant turnover and staffing difficulties within DPHHS Legal, this MOU has not yet been approved, despite our best efforts, and signed by the appropriate parties. However, VRBS and DDP are committed to fully executing this MOU in 2024.

The current draft of the MOU, which has not been updated since spring 2023 and now needs additional revisions, reads as follows:

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), Developmental Disabilities Program ("DDP").

1.2. The purpose of this MOU is to establish procedures to assure continued coordination between DDP and VRBS. This agreement is implemented in response to the vision of collaboration and innovation articulated in the 2014 Workforce Innovation and Opportunity Act (WIOA). DDP and VRBS enter into this agreement for the purpose of increasing competitive integrated employment outcomes, including supported and customized employment, for people with disabilities, including those with the most significant disabilities served by both DDP and VRBS. This agreement strives to clarify and facilitate the coordination of services and resources to support competitive integrated employment outcomes in a seamless and non-duplicative manner. The increased focus on competitive integrated employment outlined in this document is not intended to disallow other levels of employment related entitlements provided to eligible individuals through DDP.

Section 2. General Duties and Responsibilities:

2.1 **VRBS** 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.

- VRBS agrees to:
 - Consider recommendations of the DDP case manager, contracted case manager, and/or PSP team regarding the needs of individuals that they refer.
 - Presume every eligible individual referred to VRBS by DDP will benefit from VRBS in terms of achieving a competitive integrated employment outcome.
 - Coordinate with the PSP team and long-term service providers regarding mutual client Individualized Plan for Employment (IPE).
 - Provide existing documentation and referral recommendations to DDP to assist in the DDP eligibility process with appropriate signed release of information.
 - Collaborate through regularly scheduled meetings between VRBS and DDP leadership:
 - to ensure maximization of shared provider network to ensure seamless supports for individuals jointly served by communicating regarding provider changes and issues.
 - to promote and support Employment First initiatives and the Customized Employment model to increase competitive integrated employment outcomes for mutual clients.

2.2 **DDP** works with people who are eligible for the State of Montana Developmental Disabilities Program and administers the 0208 DDP Waiver through contracted service providers to provide Home and Community Based Services (HCBS) across Montana.

- DDP agrees to:
 - Promote competitive integrated employment as a valuable and viable option to all individuals
 - Refer individuals to VRBS that want to pursue, competitive integrated employment.
 - Provide existing documentation and referral recommendations to VRBS to assist in the VRBS eligibility process.
 - Support the competitive integrated employment goal in the PSP by having Supported Employment written into the cost plan for long-term follow-along services.

- Collaborate through regularly scheduled meetings between VRBS and DDP leadership:
 - to ensure maximization of shared provider network to ensure seamless supports for individuals jointly served by communicating regarding provider changes and issues.
 - to promote and support Employment First initiatives and the Customized Employment model to increase competitive integrated employment outcomes for mutual clients.

Section 3. Term and Effective Date

3.1 This MOU is effective on the date signed, February 1, 2023, and shall terminate automatically, without notice to the other party, on January 31, 2025.

Section 4. Modification

4.1 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 both parties to the agreement.

DDP and VRBS have a joint procedure that outlines the steps to efficiently and effectively refer a client to the Developmental Disabilities Program (DDP) from Vocational Rehabilitation and Blind Services (VRBS) as well as the steps to correctly refer a client to VRBS from DDP. This procedure also outlines proper procedure for securing long-term funding for supported employment, steps for procuring signed Cooperative Agreements, and assigns responsibility to specific employees throughout both programs to ensure the process is completed as outlined. DDP and VRBS administration and management as well as mutual contracted providers worked collaboratively to develop this procedure and agree upon the common rules.

Additionally, DDP and VRBS are working on a project to transition several clients currently receiving supported employment services through Montana's Extended Employment program (EE) to receiving supported employment services funded through their Medicaid funded cost plans to make room in EE for VRBS clients without Medicaid funded cost plans who are stable in competitive integrated employment and ready to exit VRBS.

7. STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES; AND

For at last five years, VRBS leadership met regularly with Montana's Mental Health Block Grant (Prevention Bureau) leadership in an attempt to formalize collaborative processes between VRBS and Mental Health Block Grant to improve existing IPS programs and implement new IPS programs across the state. While working together to advance our initiatives in this realm, VRBS and Mental Health Block Grant often included individuals from IPS Works into discussions. It was the IPS Works staff who encouraged Montana to apply for the ODEP's ASPIRE project. As explained in section I (5), Montana was one of seven states selected into the ASPIRE project and through that project VRBS and Mental Health Block Grant were able to deepen their collaboration through developing systems of braided funding for IPS.

See section I (5) above for the full, collaboratively developed MOU between VRBS, Mental Health Block Grant (Prevention Bureau), and Medicaid (Treatment Bureau) executed on October 31, 2023.

Lastly, Montana's VRBS Director, Chanda Hermanson, is an ex-officio member of the Behavioral Health Advisory Council (BHAC).

8. OTHER FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS OUTSIDE THE WORKFORCE DEVELOPMENT SYSTEM.

- VRBS 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. This past year VRBS began contracting with the WIPA project to create a Community Work Incentives Coordinator to work specifically with VRBS clients.
- VRBS presently has cooperative agreements with all of the five Section 121 projects (Flathead Reservation, Fort Belknap Reservation, Fort Peck Reservation, Rocky Boy's Reservation, and the Blackfeet Reservation) located in Montana. The purpose of these agreements is to establish procedures to assure continued coordination between the 121 projects and VRBS. These agreements are implemented for the sole purpose of enhancing, to the greatest extent possible, the delivery of rehabilitation services to persons with disabilities living in the state of Montana and residing on or near the five reservations that currently have a tribal vocational rehabilitation project.
- VRBS has contracted with San Diego State University Interwork Institute to develop and maintain a VRBS Staff training series, which is a series of electronic training modules that are being used to onboard new staff and provide continuing education to current staff.
- The local VRBS offices and the local Small Business Development Centers (SBDC) all have well established and productive working relationships with each other. SBDCs share information on classes and upcoming offerings to the VRBS offices and VRBS regularly refers clients interested in self-employment to participate in various SBDC trainings and services. VRBS will explore enhancing our current relationship with SBDCs by exploring a contract to provide technical assistance to our participants who are pursuing self-employment.
- VRBS 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.
- VRBS 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.
- VRBS 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. VRBS 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.

- VRBS has MOUs with various public transportation programs in counties across the state. The MOUs commit to procedures to assist VRBS's clients to obtain documentation necessary to receive transportation services at reduced fares.
- VRBS works with the Social Security Administration to collaborate on employment incentives and supports and to maximize Social Security Administration/Vocational Rehabilitation (SSA/VR) reimbursement activity through the Ticket to Work Program.
- VRBS routinely collaborates with other organizations to provide training opportunities for VRBS' staff. The following is a list of collaborating organizations: University of Montana-Rural Institute on Disabilities, Montana State University Billings-Montana Center for Inclusive Education, Centers 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.

VRBS 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.

VRBS 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.
3.g. statewideness and waivers of statewideness 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.

The State Plan must include
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
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.

The State Plan must include
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):
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:

The State Plan must include
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.

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

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	55.2%	55.2%	55.7%	55.7%
Employment (Fourth Quarter After Exit)	45.5%	45.5%	45.7%	45.7%
Median Earnings (Second Quarter After Exit)	\$3550	\$3550	\$3560	\$3600

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Credential Attainment Rate	28.6%	30.0%	29.3%	31.0%
Measurable Skill Gains	49.4%	56.3%	50.0%	57.0%
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 2024 and 2025.

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - VOCATIONAL REHABILITATION

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

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.

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.

Please refer to GEPA 427 - Form Instructions for 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.

GEPA 427 - Form Instructions for 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.

VRBS ensures equal access and participation to all persons regardless of their gender, race, color, national origin, age, or disability in its education programs, services, and/or activities. VRBS will enforce all federal and state laws/regulations designed to ensure equitable access to all program beneficiaries and to overcome barriers to equitable participation.

VRBS's commitment to equitable access is reflected in the program's Core Values:

- We value informed choice; our staff guide, and the people we serve decide.
- We presume all people with disabilities, including those with the most significant disabilities, can work in competitive integrated settings with advancement opportunities.
- We believe work provides a sense of purpose.

- Our services promote the civil rights of each participant.
- We respect and value diversity.
- We value our ethical foundations of autonomy, beneficence, fidelity, justice, non-maleficence, and veracity.
- We promote healthy interdependence, independent living, and community integration.
- Collaborating with partners makes us stronger and more effective.
- We continually innovate and provide state of the art services.

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.

GEPA 427 - Form Instructions for 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?

Gender, Race, Color, and Disability

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.

GEPA 427 - Form Instructions for 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?

Steps taken to ensure equitable access and to eliminate access barriers based on gender, race, national origin, color, disability, and age include but are not limited to:

- Providing accessible materials
- Providing materials to blind persons or other persons with print disabilities in a timely manner, including specialized formats such as Braille, Audio, enlarged print, and Electronic Text
- Providing professional development opportunities with the goal of empowering staff in culturally responsive practices
- Offering interpretation services for language and communication needs, including translation, transliteration, and cued speech
- Utilizing a broad range of assistive technology which includes a variety of tools that range from no- to low- to high-tech options;
- Providing reasonable accommodations based on disability
- Utilizing technologies to convey content of program and curricular materials
- Providing professional development activities in accordance with the Americans with Disabilities Act (ADA), the Rehabilitation Act of 1973 Section 504, and the Individuals with Disabilities Education Act (IDEA) to staff and contractors
- Providing individualized resources designed to support diverse students to be college, career, and community ready, including integrated employment experiences, access to STEM-related curricula, and enrollment in Career and Technical Centers
- Hiring, recruiting, and involving individuals from diverse social and ethnic minority groups to the greatest extent possible

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.

GEPA 427 - Form Instructions for 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?

This State Plan cycle.

**GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - SUPPORTED EMPLOYMENT
EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES**

OMB Control Number 1894-0005 Expiration 02/28/2026

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.

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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.

Please refer to GEPA 427 - Form Instructions for 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.

GEPA 427 - Form Instructions for Application Package

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Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

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VRBS's commitment to equitable access is reflected in the program's Core Values:

- We value informed choice; our staff guide, and the people we serve decide.
- We presume all people with disabilities, including those with the most significant disabilities, can work in competitive integrated settings with advancement opportunities.
- We believe work provides a sense of purpose.
- Our services promote the civil rights of each participant.
- We respect and value diversity.
- We value our ethical foundations of autonomy, beneficence, fidelity, justice, non-maleficence, and veracity.
- We promote healthy interdependence, independent living, and community integration.
- Collaborating with partners makes us stronger and more effective.
- We continually innovate and provide state of the art services

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.

GEPA 427 - Form Instructions for 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?

Gender, Race, Color, and Disability.

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.

GEPA 427 - Form Instructions for 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?

Steps taken to ensure equitable access and to eliminate access barriers based on gender, race, national origin, color, disability, and age include but are not limited to:

- Providing accessible materials
- Providing materials to blind persons or other persons with print disabilities in a timely manner, including specialized formats such as Braille, Audio, enlarged print, and Electronic Text
- Providing professional development opportunities with the goal of empowering staff in culturally responsive practices
- Offering interpretation services for language and communication needs, including translation, transliteration, and cued speech
- Utilizing a broad range of assistive technology which includes a variety of tools that range from no- to low- to high-tech options;
- Providing reasonable accommodations based on disability
- Utilizing technologies to convey content of program and curricular materials
- Providing professional development activities in accordance with the Americans with Disabilities Act (ADA), the Rehabilitation Act of 1973 Section 504, and the Individuals with Disabilities Education Act (IDEA) to staff and contractors

- Providing individualized resources designed to support diverse students to be college, career, and community ready, including integrated employment experiences, access to STEM-related curricula, and enrollment in Career and Technical Centers
- Hiring, recruiting, and involving individuals from diverse social and ethnic minority groups to the greatest extent possible

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.

GEPA 427 - Form Instructions for 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?

This State Plan cycle.

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), who receive priority of service, are required to complete a Veteran Triage form prior to referral to Disabled Veterans' Outreach Program (DVOP) staff in a JSM office. The triage form is located at the front counter at all JSM offices. Staff have been trained to request completion of the Triage form to determine eligibility prior to referral to the DVOP. Veterans and eligible spouses (or covered persons) will receive priority of service over non-veterans when it comes to receiving employment, training, and job placement services.

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 SBE Veterans to include VR&E enrolled Veterans. This includes a comprehensive assessment and individual employment plan based upon the employment plan provided by the VA for the VR&E Veterans. 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 02-21 and GO Memo 03-21 as the third component of case management.

LVER staff will promote the advantages of hiring veterans to employers, employer associations, and business groups. LVER staff will advocate for all veterans served by the JSM with business, industry, and other community-based organizations by participating in appropriate activities such as:

- Planning and participating in job or career fairs;
- Conducting employer outreach;
- In conjunction with employers, conducting job searches and workshops, and establishing job search groups;
- Coordinating with unions, apprenticeship programs and businesses or business organizations to promote and secure employment and training programs for veterans;
- Informing Federal contractors of the process to recruit qualified veterans;
- Promoting credentialing and licensing opportunities for veterans; and
- Coordinating and participating with other business outreach efforts.

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.

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.

Veterans are an important part of the Montana workforce, with over 50,000 veterans employed. Montana has the 2nd highest rate of veterans among states, but the labor force participation rate of Montana veterans is lower than the national average. Roughly 30% of Montanan's veterans have a disability, which contributes to lower-than-average labor force participation rates.

DVOPs are charged with providing case management and individualized careers services to eligible veterans, spouses, and veterans with Significant Barriers to Employment (SBEs) as outlined in Veterans Program Letters (VPLs) 3-14, VPL 3-14 Change 1, and VPL 3-14 Change 2, 03-19.

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.

Below are the criteria used to determine eligibility for DVOP services:

- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C § 4211(1) and (3); special disabled and disabled veterans are those who:
 - are entitled to compensation (or who, but for the receipt of military retired pay, would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs.
 - were discharged or released from active duty because of a service-connected disability.
- A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. I 1302(a) and (b)), as amended.
- A recently separated service member, as defined in 38 U.S.C § 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months.

- An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration.
- A veteran lacking a high school diploma or equivalent certificate.
- A low-income individual (as defined by WIOA Section 3 (36)).
- Veterans aged 18-24.
- Vietnam-era veterans.
- Eligible Transitioning Service Members, Spouses, and Caregivers.

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 SBE in a priority category and perform case management duties.
- Referral of veterans to employment opportunities.

LVER staff advocate for all veterans, served by JSM, with business, industry and other community-based organizations by participating in appropriate activities such as career services. These services include but are not limited to:

- Planning and participation in job and career fairs meeting with employers;
- Conducting employer outreach;
- Collaborating with employers, conducting job searches and workshops, and establishing search groups;

- Coordinating with unions, apprenticeship programs, and business organizations to promote and secure employment and training programs for veterans;
- Informing Federal contractors and sub-contractors of the process to recruit qualified veterans;
- Promoting credentialing and licensing opportunities for veterans; and
- Coordinating and participating with other business outreach efforts.

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.

JVSG programs, are administered by MTDLI and are co-located with, integrated into, and managed by JSM, these positions include:

- Disabled Veterans Outreach Specialists (DVOP).
- A Veteran Intensive Service Coordinator who also serves as the program manager and Local Veterans Employment Representative (LVER).

Customers entering JSM offices are screened for eligibility and referred to JVSG staff as appropriate. In most cases, JVSG clients are co-enrolled in Title I-B programs.

DVOP staff work closely with JSM staff to ensure Veteran clients receive priority of service and are referred to the appropriate staff. This is accomplished through training at JSM weekly staff meetings.

LVER staff work closely with JSM Business Services teams to promote the hiring of veterans by private and public employers. During these outreach visits, the LVER and the Business Services teams inform their audiences about MTDLI services, including LVER and DVOP services. Business Services teams collaborate with the LVER to raise employer awareness of the JVSG program, and the services provided by a DVOP specialist and LVER. All JSM partners receive frequent training on DVOP and LVER services.

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;
- Local Veterans' Employment Representative (LVER) staff;
- 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 cash amount for individual and office awards will be 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 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 2024	PY 2025
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. Participant's 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-skill sets 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:
 1. Easterseals Goodwill (ESGW)
 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

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 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 49 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 the older worker;
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 job
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 on-line 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 who may offer technical assistance in areas needing improvement.

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'22 State Grantee AP	PY'22 National Grantee AP	PY'23 State Grantee AP	PY'23 National Grantee AP
<i>Beaverhead</i>	Dillon	0	2	0	2
Big Horn	Pryor, Harden, Lodge Grass	2	0	2	1
<i>Blaine</i>	Chinook	0	2	0	2
<i>Broadwater</i>	Townsend	0	2	0	2
<i>Carbon</i>	Red Lodge	0	3	0	3
Carter		0	0	0	0
Cascade	Great Falls, Cascade, Belt	5	13	5	13

County	Cities	PY'22 State Grantee AP	PY'22 National Grantee AP	PY'23 State Grantee AP	PY'23 National Grantee AP
<i>Chouteau</i>	Fort Benton	0	2	0	2
Custer	Miles City, Lame Deer, Ashland	1	2	1	2
Daniels		0	1	0	1
<i>Dawson</i>	Glendive	0	1	0	1
<i>Deer Lodge</i>	Anaconda	0	4	0	4
Fallon		0	1	0	1
Fergus	Lewistown	0	3	0	3
Flathead	Kalispell, Whitefish, West Glacier, Big Fork, Coram	8	14	8	14
Gallatin	Bozeman, Belgrade	4	8	4	8
Garfield		0	0	0	0
<i>Glacier</i>	Cut Bank, Browning	0	6	0	6
Golden Valley		0	0	0	0
Granite		0	1	0	1
<i>Hill</i>	Havre	0	3	0	3
<i>Jefferson</i>	Boulder	0	2	0	2
Judith Basin		0	1	0	1
Lake	Polson, Elmo, Ronan, Pablo	5	4	5	4
Lewis and Clark	Helena, East Helena, Augusta, Lincoln	6	6	6	8
Liberty		0	0	0	0
<i>Lincoln</i>	Libby	0	10	0	10
<i>Madison</i>	Virginia City	0	3	0	3

County	Cities	PY'22 State Grantee AP	PY'22 National Grantee AP	PY'23 State Grantee AP	PY'23 National Grantee AP
McCone		0	1	0	1
Meagher	White Sulphur Springs	0	1	0	1
Mineral	Superior	0	2	0	2
Missoula	Missoula, East Missoula, Frenchtown	7	14	7	14
Musselshell	Roundup	0	2	0	2
Park	Livingston	0	5	0	5
Petroleum		0	0	0	0
Phillips	Malta	0	2	0	2
Pondera	Conrad	0	2	0	2
Powder River	Broadus	0	1	0	1
Powell	Deer Lodge	0	1	0	1
Prairie	Terry	0	0	0	0
Ravalli	Hamilton, Stevensville, Corvallis, Darby	5	11	5	11
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	11
Stillwater	Columbus	0	2	0	2
Sweet Grass	Big Timber	0	1	0	1
Teton	Chouteau	0	2	0	2
Toole	Shelby	0	2	0	2

County	Cities	PY'22 State Grantee AP	PY'22 National Grantee AP	PY'23 State Grantee AP	PY'23 National Grantee AP
Treasure		0	0	0	0
<i>Valley</i>	Glasgow	0	3	0	3
<i>Wheatland</i>	Harlowton	0	1	0	1
<i>Wibaux</i>	Wibaux	0	0	0	0
Yellowstone	Billings, Park City, Ballantine, Laurel	9	24	9	24
TOTAL AP		52	200	52	201
	<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'22 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 forty-nine counties out of the total fifty-six counties in Montana. Ten of these counties also have state-designated positions. Even with population shifts each year that cause some counties to be over-served and some to be under-served, the authorized numbers meet the Census figures.

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 12% of Montana SCSEP participants served in the 2nd quarter of PY'23 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 11% 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'22 4th quarter end performance report: American Indian 11%, Asian/Native Hawaiian/Pacific Islander 0%, Black or African American 6% Hispanic, Latino or Spanish Origin 6%. 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'22 2nd quarter report 14% 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'22 2nd quarter show that 32% of enrolled participants had some form of disability with 6% of those individuals having a severe disability.

F. FORMERLY INCARCERATED INDIVIDUALS, AS DEFINED IN TEGL 17-20

Most in Need Characteristics **PY**
'23 3rd Quarter

Category	Total Participants	% of Participants
65 years of age or older	5	13.51
Has a disability	13	35.14
Has limited English proficiency	4	10.81
Resides in a rural area	13	35.14
Veteran or eligible spouse of veteran	8	21.62
Has low employment prospects	36	97.30
Failed to find employment after utilizing Title WIOA service opportunities	0	0.00
Homeless or at risk for homelessness	28	75.68
Formerly incarcerated	5	13.51

Six participants were enrolled in the first quarter of PY'23 using the formerly incarcerated most in need characteristic. At the end of the 3rd quarter, the total number of participants decreased to five with the overall percentage at 13.51. Overall, the year-to-date total of participants enrolled using the most in need criteria was six enrollments with the year to date percentage of 11.11.

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.

PERFORMANCE INDICATOR APPENDIX

ALL WIOA CORE PROGRAMS

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

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - ADULT PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

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

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

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

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

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

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	71.0%	71.0%	71.0%	71.0%
Employment (Fourth Quarter After Exit)	69.0%	69.0%	69.0%	69.0%
Median Earnings (Second Quarter After Exit)	\$6,500	\$7,350	\$6,500	\$7,350

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Credential Attainment Rate	53.0%	53.0%	53.0%	53.0%
Measurable Skill Gains	56.0%	56.0%	56.0%	56.0%
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 2024 and 2025.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

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

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

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

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

- Credential Attainment Rate; and
- Measurable Skill Gains

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

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

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

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

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

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

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

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the

core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

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

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	75.0%	75.0%	75.0%	75.0%
Employment (Fourth Quarter After Exit)	73.0%	73.0%	73.0%	73.0%
Median Earnings (Second Quarter After Exit)	\$9,000	\$10,800	\$9,000	\$10,800
Credential Attainment Rate	57.0%	57.0%	57.0%	57.0%
Measurable Skill Gains	54.0%	50.0%	54.0%	50.0%
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 2024 and 2025.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

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

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment

Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

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

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

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

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

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

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

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

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

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

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

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

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	63.0%	63.0%	63.0%	63.0%
Employment (Fourth Quarter After Exit)	57.0%	58.6%	57.0%	58.6%
Median Earnings (Second Quarter After Exit)	\$3,400	\$4,100	\$3,400	\$4,100
Credential Attainment Rate	50.0%	30.0%	50.0%	34.0%
Measurable Skill Gains	50.0%	38.0%	50.0%	42.0%
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 2024 and 2025.

WAGNER-PEYSER ACT - WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

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

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

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

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

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

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

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

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

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

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

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

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

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

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	67.0%	67.0%	67.0%	67.0%

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Fourth Quarter After Exit)	65.0%	67.0%	65.0%	67.0%
Median Earnings (Second Quarter After Exit)	\$5,900	\$7,400	\$5,900	\$7,400
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

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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 2024 and 2025.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM - ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

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

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

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available

to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

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

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

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

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

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

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

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

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

indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

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

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

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	60.0%	52.0%	60.0%	53.0%
Employment (Fourth Quarter After Exit)	58.0%	56.5%	58.0%	57.0%
Median Earnings (Second Quarter After Exit)	\$4,000	\$4,390	\$4,000	\$4,400
Credential Attainment Rate	40.0%	59.0%	40.0%	60.0%
Measurable Skill Gains	54.0%	54.0%	54.0%	55.0%
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 2024 and 2025.

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).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)	55.2%	55.2%	55.7%	55.7%
Employment (Fourth Quarter After Exit)	45.5%	45.5%	45.7%	45.7%
Median Earnings (Second Quarter After Exit)	\$3550	\$3550	\$3560	\$3600
Credential Attainment Rate	28.6%	30.0%	29.3%	31.0%
Measurable Skill Gains	49.4%	56.3%	50.0%	57.0%

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
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 2024 and 2025.

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

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2024 Expected Level	PY 2024 Negotiated Level	PY 2025 Expected Level	PY 2025 Negotiated Level
Employment (Second Quarter After Exit)				
Employment (Fourth Quarter After Exit)				
Median Earnings (Second Quarter After Exit)				
Credential Attainment Rate				
Measurable Skill Gains				
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 2024 and 2025.

ADDITIONAL INDICATORS OF PERFORMANCE

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

Additional Indicators of Performance
Effectiveness in Serving Employers is still be piloted and data will not be entered.

OTHER APPENDICES

No other appendices will be submitted.