IDAHO PYS 2022-2023 (MOD)

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I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

A. WIOA STATE PLAN TYPE

This is a combined plan

COMBINED PLAN PARTNER PROGRAM(S)

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.))

B. PLAN INTRODUCTION OR EXECUTIVE SUMMARY

No narrative included for this optional element.

II. STRATEGIC ELEMENTS

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

1. ECONOMIC AND WORKFORCE ANALYSIS

The state plans on addressing several technical assistance items identified by the federal review team after the plan's submission.

(i) EXISTING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

This section analyzes Idaho's high-demand industries and provides an overview of Idaho's Target Sectors. It also covers Idaho's high-demand occupations, including an analysis of Idaho's "Hot Jobs" list, which are those jobs that generally require some training, pay a better wage and are predicted to be in high demand.

High-Demand Industries

High demand industries can be defined in several ways. Most commonly they are industries with the largest number of workers. However, for the purpose of analyzing Idaho's industrial make-up to determine what industries might be the best to target, that industry's employment as a percentage of nonfarm employment and its rate of job growth over a period of time will also be part of the equation, employment in the government sectors, excepting education, will not be included in the discussion of job growth and target industries. Government employment is important, but its jobs are not actively created and most often support efforts in private industry. There are industries that cross multiple sectors and are not considered formal industries in the North American Industrial Classification System, commonly known as NAICS. Two of these often referred to are tourism and high tech. These hybrid industries do have an impact on Idaho's economy but are a combination of several industrial sectors. Just as these two industries are made up of smaller industrial classifications, specific occupations can be found in many industries. That is why it is important that the analysis of demand industries is not limited just to those with the highest number of workers.

Idaho Department of Labor 2020 data shows Idaho had a monthly average of 755,100 nonfarm payroll jobs. Total nonfarm employment is further classified in seven industry supersectors. Table 1 for detailed Nonfarm Jobs shows the seven highest-demand super-sectors, based on the number of jobs. The top three – education and health services, trade, transportation and

utilities, and construction – accounted for more than 50 percent of growth between 2010 and 2020. These other four high-demand supersectors are professional and business services; leisure and hospitality; manufacturing; and financial activities. The number of jobs in these seven supersectors range from 111,500 to 37,500.

Employment growth and trends since 2010 illustrate the recovery from the 2007 recession. Since 2010, each of the supersectors has shown significant growth. The recession caused a dramatic loss of 51,500 jobs between 2007 and 2010. After that, Idaho's economy created 151,900 new jobs. Education and health services added the most jobs—28,400, while the information supersector decreased by 2,200 jobs. Construction, like manufacturing, experienced devastating job losses during the recession but grew significantly after 2010. However, construction has relatively increased the most between 2010 and 2020, by 79 percent, in part due to the rapid growth in Idaho.

Table 1: Employment in Idaho Private Supersectors Adding the Most Jobs, 2010-2020

Supersectors	**2007**	**2010**	**2020**	**2010-20, Difference**
Education and health services	73,600	83,100	111,500	28,400
Trade, transportation, and utilities	131,400	119,900	146,400	26,500
Construction	52,000	31,200	55,800	24,600
Professional and business services	84,200	75,700	99,000	23,300
Leisure and hospitality	63,300	58,000	75,800	17,800
Manufacturing	66,400	53,300	68,200	14,900
Financial activities	32,400	29,200	37,500	8,300
Idaho Nonfarm Payroll Jobs	**654,700**	**603,200**	**755,100**	**151,900**

Another way to determine demand is by the percent change in the number of jobs over time. Following the recession, jobs in four supersectors grew more than 30 percent, while total nonfarm jobs grew 25.2 percent between 2010 and 2020. They were construction (79 percent); education and health services (34 percent); professional, scientific and technical services (31 percent); leisure and hospitality (31 percent). Jobs in professional and business services more than tripled between 2007 and 2020. Table 2 provides information on both the numeric and percentage growth of those supersectors.

Table 2: Employment in Idaho's Seven Fastest-Growing Private Supersectors, 2010-2020

Supersectors	2007	2010	2020	2007-19, Numeric Change	2010-20, Numeric Change	2007-20, Percent Change	2010-20, Percent Change
Construction	52,000	31,200	55,800	3,800	24,600	7%	79%
Education and health services	73,600	83,100	111,500	37,900	28,400	51%	34%

Supersectors	2007	2010	2020	2007-19, Numeric Change	2010-20, Numeric Change	2007-20, Percent Change	2010-20, Percent Change
Professional and business services	31,800	75,700	99,000	67,200	23,300	211%	31%
Leisure and hospitality	63,300	58,000	75,800	12,500	17,800	20%	31%
Financial activities	32,400	29,200	37,500	5,100	8,300	16%	28%
Manufacturing	66,400	53,300	68,200	1,800	14,900	3%	28%
Trade, transportation, and utilities	131,400	119,900	146,400	15,000	26,500	11%	22%
Idaho Nonfarm Payroll Jobs	**654,700**	**603,200**	**755,100**	**100,400**	**151,900**	**15.3%**	**25.2%**

Idaho Target Sectors

In recent years, the Idaho Department of Labor staff along with the Workforce Development Council leadership began discussing potential target industries for the state. The group analyzed the number of current jobs and gross domestic product (GDP) in each supersector. Table 3 ranks the supersectors by employment and gross domestic product. While education and health care, retail trade and professional and business services ranked highest in employment; the share of GDP for finance/insurance/real estate tops all supersectors leaving manufacturing and professional and business services the next top contributors. In the industry makeup of the state retail trade is a large supersector and while many of its jobs are entry-level and low skill this super-sector is prime as a springboard for workforce development and skill enhancement.

Jobs in education are primarily found in the government sector and as such are typically low in both employment and contributions to GDP but are vital for the state since they provide educational opportunities and skill development for current and future work force.

Table 3: Ranking of Private Supersectors by Employment and GDP: 2020

Industry Supersector	Employment	Employment Rank	GDP	GDP Rank
Private industries	630,800		$65,183	
Educational services, health care, and social assistance	111,500	1	$6,546	4
Professional and business services	99,000	2	$8,050	3
Retail trade	88,300	3	$5,998	5
Arts, entertainment, recreation, accommodation, and	75,800	4	$2,155	8

Industry Supersector	Employment	Employment Rank	GDP	GDP Rank
food services				
Manufacturing	68,200	5	$8,846	2
Construction	55,800	6	$4,327	7
Finance, insurance, real estate, rental, and leasing	37,500	7	$12,646	1
Wholesale trade	31,200	8	$4,680	6
Transportation and warehousing	26,900	9	$1,762	9
Information	7,400	10	$1,735	10
Mining	3,700	11	$225	12
Utilities	3,000	12	$1,310	11

*2020 Nonfarm Annual Average

Employment projections, wages paid, and the multiplier impact of supersectors on Idaho's economy are also important areas to look at. Staffing patterns of the potential supersectors were analyzed by high demand, hot jobs, and wages. On a quarterly basis, the department's Research and Analysis Bureau presents the Workforce Development Council with economic updates regarding Idaho's target super-sectors. These updates and data are discussed at the Council level to monitor the continued relevance of these clusters in real time and measure their impact on Idaho's economy and workforce.

Table 4 shows the top five supersectors projected to grow significantly during the next 10 years. Growth also will occur in other supersectors including public administration, educational services, wholesale trade as well as transportation and warehousing.

Table 4: Private Supersector Ranked by Projected Employment Growth, 2020-2030

Supersector	2020 Jobs	2030 Jobs	Growth in Numbers	% Change	% Rank
Total Employment	**806,943**	**933,563**	**126,620**	**15.7%**	
Health Care and Social Assistance	109,395	132,551	23,156	21.2%	4
Construction	54,337	75,469	21,132	38.9%	1
Leisure and Hospitality	76,748	91,946	15,198	19.8%	5
Professional and Business Services	97,874	110,711	12,837	13.1%	12
Manufacturing	67,681	80,328	12,647	18.7%	7

Together, these five supersectors provide more than 50 percent of Idaho jobs. The largest is health care and social assistance, which currently provide 13 percent of all jobs and projected to increase to 14 percent over ten years. The smallest is manufacturing at just over 8 percent.

Table 4 shows that each of the target supersectors will continue to grow and provide job opportunities for Idaho's work force.

- **Health Care and Social Services** comprises ambulatory medical care, hospitals, nursing, residential care, childcare, vocational rehabilitation services and mental health services. Many of the services provided by this sector are delivered by trained professionals. All establishments have labor inputs of health practitioners or social workers with the necessary expertise. This supersector, which includes public and private employment, provides 13.5 percent of Idaho's jobs. Although this sector includes only four major industry categories, it includes more than 150 occupations.
- **Construction** comprises nine industries, ranging from residential and highway construction to special trade contractors such as electricians and plumbers. As a result of the recession, construction employment as a percent fell to a low of 4.8 percent in 2011-2012 but has since increased in the percent of jobs each year, reaching 6.7 percent by 2020.
- **Leisure and Hospitality** comprises five industries – including accommodation, amusement, performing arts, sports and food services. This industry comprises nearly 10 percent of Idaho's non-farm jobs.
- **Professional, Scientific and Technical Services** comprises nine industries including: legal services; accounting and tax preparation; architectural and engineering; computer systems design; consulting; scientific research; and advertising. There are nearly 200 occupations in this supersector, which provides slightly more than 12 percent of Idaho's nonfarm jobs and some of the highest paid occupations.
- **Manufacturing** includes a wide range of activities—from food processing and wood processing to making computer and electronic products and transportation equipment. Food processing and transportation equipment are the fastest growing manufacturing sectors. Many of Idaho's high-tech jobs are in the manufacturing supersector. The amount of nonfarm jobs in manufacturing contributed to 8.4 percent of Idaho's jobs.

High-Demand Occupations

Occupations generally cross industries. Some will be more prominent in specific industries but can be found to a lesser degree in others. For example, although most nurses work in health care, some work in manufacturing, retail, education and other supersectors. Similarly, food service workers mostly work at restaurants and related businesses, but some work at school cafeterias, retail stores, hospitals, and nursing homes.

Occupations are considered high-demand if they have at least 100 openings annually. Average annual openings reflect churn in the labor force. Openings include those where individuals left a particular occupation for any reason or transferred out of a particular occupation to another one. Also included are openings that are new due to growth in that particular occupation. Table 5 lists the top ten high-demand occupations, ranked by the number of annual openings –which include transfers, exits and new jobs. Table 6 lists the top ten high-demand occupations, ranked by the number of new jobs.

Table 5: Top 10 High-Demand Occupations Ranked by Annual Openings

Occupation Title	2020 - 2030 Projected Growth	2020 - 2030 Growth Rate	Annual Exits	Annual Transfers	New Jobs	Total Annual Openings	Hourly Median Wage	Education Level
Carpenters	5,460	45%	877	1,309	546	2,733	$18.59	HSDE

Occupation Title	2020 - 2030 Projected Growth	2020 - 2030 Growth Rate	Annual Exits	Annual Transfers	New Jobs	Total Annual Openings	Hourly Median Wage	Education Level
Construction Laborers	3,054	28%	801	1,172	305	2,278	$16.54	LHS
General and Operations Managers	2,179	15%	822	1,132	218	2,172	$33.49	BD
Miscellaneous Assemblers and Fabricators	2,092	26%	582	929	209	1,721	$14.77	HSDE
Registered Nurses	3,050	20%	351	809	305	1,465	$34.27	BD
Farmers, Ranchers, and Other Agricultural Managers	1,143	13%	280	888	114	1,282	$31.17	HSDE
Light Truck or Delivery Services Drivers	1,635	27%	415	700	164	1,279	$15.63	HSDE
Sales Representatives, Wholesale and Manufacturing	1,075	15%	467	695	108	1,270	$27.27	HSDE
Electricians	1,629	31%	421	591	163	1,175	$24.79	HSDE
First-Line Supervisors of Construction Trades	1,755	39%	326	477	176	978	$29.11	HSDE

*Annual Openings include openings due to exits, transfers and projected growth (New Jobs)

Table 6: Top 10 High-Demand Occupations Ranked by Number of New Jobs

Title	2020 - 2030 Projected Growth	2020 - 2030 Projected Growth Rate	Annual Change	Hourly Median Wage	Education Level
Carpenters	5,460	44.70%	546	$18.59	HSDE
Construction Laborers	3,054	27.60%	305	$16.54	LHS
Registered Nurses	3,050	19.90%	305	$34.27	BD
General and Operations	2,179	15.40%	218	$33.49	BD

Title	2020 - 2030 Projected Growth	2020 - 2030 Projected Growth Rate	Annual Change	Hourly Median Wage	Education Level
Managers					
Miscellaneous Assemblers and Fabricators	2,092	25.60%	209	$14.77	HSDE
First-Line Supervisors of Construction Trades	1,755	39.00%	176	$29.11	HSDE
Light Truck or Delivery Services Drivers	1,635	26.70%	164	$15.63	HSDE
Electricians	1,629	31.40%	163	$24.79	HSDE
Farmers, Ranchers, and Other Agricultural Managers	1,143	12.90%	114	$31.17	HSDE
Passenger Vehicle Drivers, Except Bus Drivers, Transit and Intercity	1,086	27.40%	109	$14.32	LHS

The occupations ranked in Tables 5 and 6 share several common occupations. However, occupations ranked by the number of new jobs also include passenger vehicle drivers, except transit and intercity bus drivers. These include common transportation occupations including Lyft and Uber, a passenger transportation trend which has grown in recent years.

The Idaho Department of Labor defines Idaho's hot jobs as those jobs which generally require some training, pay a better wage, and are predicted to be in high demand. Specifically, the criteria used to determine which jobs are included on the hot jobs list include (1) the number of annual openings, (2) median wage, and (3) projected growth. Some hot jobs have fewer than 100 openings a year but make the list due to their high wages and projected growth. For example, the occupation of "environmental engineers" has only 78 annual openings, but the median wage and growth rate are remarkably high. The top 20 hot jobs are listed below.

Table 7: Top 20 Hot Jobs by Ranking

Hot Job Rank	Title	2020 – 2030 Projected Growth	2020 – 2030 Projected Growth Rate	New Jobs	Total Annual Openings*	Hourly Median Wage	Typical Education Level
1	Construction Managers	943	35.4%	94	418	$36.43	BD
2	First-Line Supervisors of	1,755	39.0%	176	978	$29.11	HSDE

Hot Job Rank	Title	2020 – 2030 Projected Growth	2020 – 2030 Projected Growth Rate	New Jobs	Total Annual Openings*	Hourly Median Wage	Typical Education Level
	Construction Trades						
3	Hazardous Materials Removal Workers	327	46.8%	33	191	$34.05	HSDE
4	Dental Hygienists	561	27.4%	56	243	$36.68	AD
5	Cost Estimators	476	34.7%	48	272	$29.73	BD
6	Electricians	1,629	31.4%	163	1,175	$24.79	HSDE
7	Registered Nurses	3,050	19.9%	305	1,465	$34.27	BD
8	Environmental Engineers	174	34.7%	17	78	$51.28	BD
9	Physical Therapists	427	24.1%	43	153	$39.83	DPD
10	Sales Engineers	99	35.5%	10	65	$49.69	BD
11	Plumbers, Pipefitters, and Steamfitters	628	30.3%	63	449	$23.92	HSDE
12	Medical and Health Services Managers	416	17.5%	42	333	$43.99	BD
13	Industrial Engineers	226	21.6%	23	134	$44.67	BD
13	Carpenters	5,460	44.7%	546	2,733	$18.59	HSDE
15	Physician Assistants	195	22.8%	20	104	$53.79	MD
16	Software Developers and Software Quality Assurance Analysts and Testers	669	15.9%	67	559	$44.03	BD
17	Cement Masons and Concrete Finishers	966	36.1%	97	564	$20.60	LHS

Hot Job Rank	Title	2020 – 2030 Projected Growth	2020 – 2030 Projected Growth Rate	New Jobs	Total Annual Openings*	Hourly Median Wage	Typical Education Level
18	Family Medicine Physicians	257	21.3%	26	76	$99.26	DPD
18	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	1,022	30.9%	102	651	$20.73	PDNA
20	Civil Engineers	424	17.3%	42	346	$38.04	BD

*Annual Openings include openings due to exits, transfers and projected growth (New Jobs)

SOURCE: Idaho Department of Labor Occupational Projections, 2020-2030

The list below shows major occupational groups and how many of Idaho's 50 hot jobs are included and the projected annual openings from those occupations.

- **Architecture and Engineering –** Seven occupations requiring an associate's or bachelor's degree, 1029 openings
- **Business and Finance** - One occupation requiring a bachelor's degree, 272 openings
- **Community and Social Service** - One occupation requiring a bachelor's degree, 328 openings
- **Computer and Mathematical** - One occupation requiring a bachelor's degree, 559 openings
- **Construction and Extractions** - Eleven occupations requiring either a high school diploma or equivalent or no formal educational credential, 9,746 openings
- **Education, Training and Library** - Two occupations requiring a bachelor's degree or a master's degree, 245 openings
- **Healthcare Practitioners and Technical** - Ten occupations requiring education ranging from an associate degree to a doctoral or professional degree — 2,442 openings
- **Healthcare Support -** One occupation requiring an associate-s degree, 105 openings
- **Installation, Maintenance and Repair** - Three occupations requiring either a high school diploma or equivalent or postsecondary non-degree award, 933 openings
- **Management** - Seven occupations with one requiring a high school diploma or equivalent and all others requiring a bachelor's degree, 4,892 openings
- **Personal Care and Service** - One occupation requiring high school diploma or equivalent, 708 openings
- **Production** – Two occupations requiring a high school diploma or equivalent, 1,445 openings
- **Sales and Related** - Two occupations—one requiring a high school diploma or equivalent and one requiring a bachelor's degree, 1,335 openings

Of the 50 hot jobs, 33 require some type of training beyond high school, including seven of the top 10. Projected growth of these occupations, coupled with education data and direct input from representatives of Idaho industries, lend strong support to the state's goal to increase educational attainment beyond high school. It is vital that Idaho's labor force seek educational opportunities to qualify for the hot jobs projected over the next 10 years.

The Research and Analysis Bureau in the Idaho Department of Labor publishes a monthly job listing report. The report provides current data on the number of job openings in Idaho for each month and the average number of new openings. The jobs are ranked by the monthly average listings. "New listings" are those listed for the first time that month. The number of listings open 90 days or more are considered hard-to-fill. The wages are presented as the median annual wage rather than the median hourly rate because that is what is published monthly. Many of the top 20 job listings are also on the high demand occupations based on occupational employment projections. Most of those occupations show up at the top of the job listings every month due to high demand. The top 20 job listings for 2020 are listed below.

Table 8: Average Monthly Job Listings, 2020

Rank	Occupational Title	2020 Average Job Listings	2020 Average New Job Listings	Median Annual Wage (OES)	Education Level
	Total, All Occupations	**15,832**	**5,993**	**$35,360**	
1	Registered Nurses	652	253	$69,320	BD
2	Customer Service Representatives	496	197	$32,020	HSDE
3	Retail Salespersons	448	175	$25,220	LHS
4	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	445	168	$54,950	HSDE
5	Heavy and Tractor-Trailer Truck Drivers	372	133	$41,780	PNDA
6	First-Line Supervisors of Retail Sales Workers	320	124	$39,720	HSDE
7	Laborers and Freight, Stock, and Material Movers, Hand	288	113	$28,950	HSDE
8	Managers, All Other	255	97	*	HSDE
9	Combined Food Preparation and Serving Workers, Including Fast Food	236	93	*	HSDE

Rank	Occupational Title	2020 Average Job Listings	2020 Average New Job Listings	Median Annual Wage (OES)	Education Level
10	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	228	89	$24,930	LHS
11	Computer Occupations, All Other	227	84	*	BD
12	Software Developers, Applications	225	80	*	BD
13	Maintenance and Repair Workers, General	207	78	$35,320	HSDE
14	Nursing Assistants	189	70	*	PNDA
15	Medical and Health Services Managers	185	71	$88,160	BD
16	Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	167	66	$33,520	HSDE
17	Personal Care Aides	165	65	*	HSDE
18	Cooks, Restaurant	160	56	$24,830	LHS
19	Driver/Sales Workers	152	57	$24,480	HSDE
20	Maids and Housekeeping Cleaners	147	58	$22,440	LHS

NOTE: Median Annual Wage is from the 2020 Occupational Employment & Wage Survey released in May 2020

SOURCE: Idaho Department of Labor - Communications & Research Division & The Conference Board's Help Wanted OnLine

(ii) Emerging Demand Industry Sectors and Occupations & (iii) Employers' Employment Needs

This section analyzes emerging demand industry sectors and occupations by way of examining high growth industries and occupations. In several cases, industries and occupations that have previously been discussed as high demand are also high growth. For example: construction is a high growth industrial sector and many construction occupations are in current high demand.

However, there are some occupations that are not currently high demand but are growing—such as electronics engineers or nuclear technicians. Additionally, subsectors within a high-growth industry may be emerging. For example, more than one-half of the growth in the health care field is projected to occur in ambulatory health care services, which include doctor's offices, outpatient care centers, home health care and laboratories. These and other trends are discussed in greater depth under "Growth Industries" and "Growth Occupations."

Growth Industries

This section examines Idaho's industries in terms of projected employment growth. The industrial supersectors projected to have the largest net job growth between 2020 and 2030 are:

- Health Care and Social Assistance – 23,156
- Construction – 21,132
- Manufacturing – 12,647
- Accommodation and Food Services – 11,364
- Educational Services (include private and government jobs) – 9,947
- Wholesale Trade – 5,250

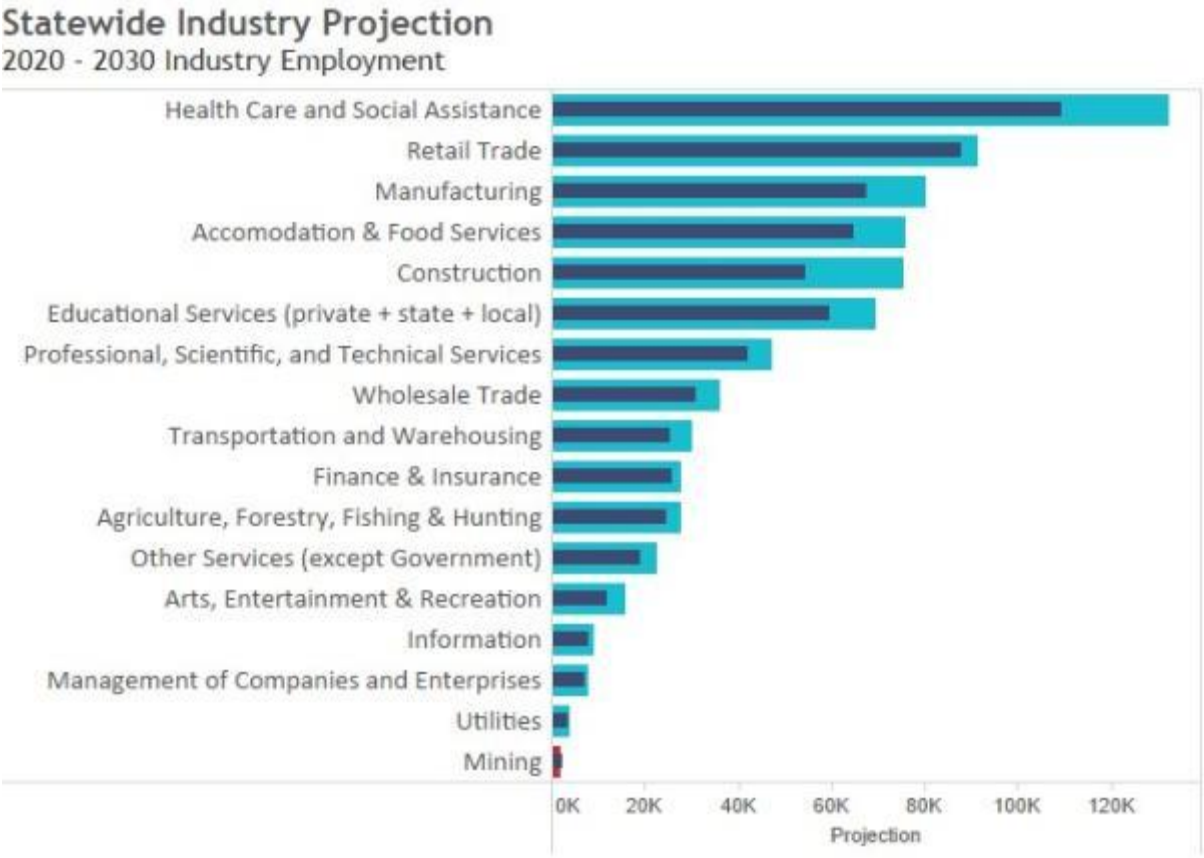


Figure 1. Statewide industry employment projections from 2020 base employment (dark blue) through 2030 projections (light blue).

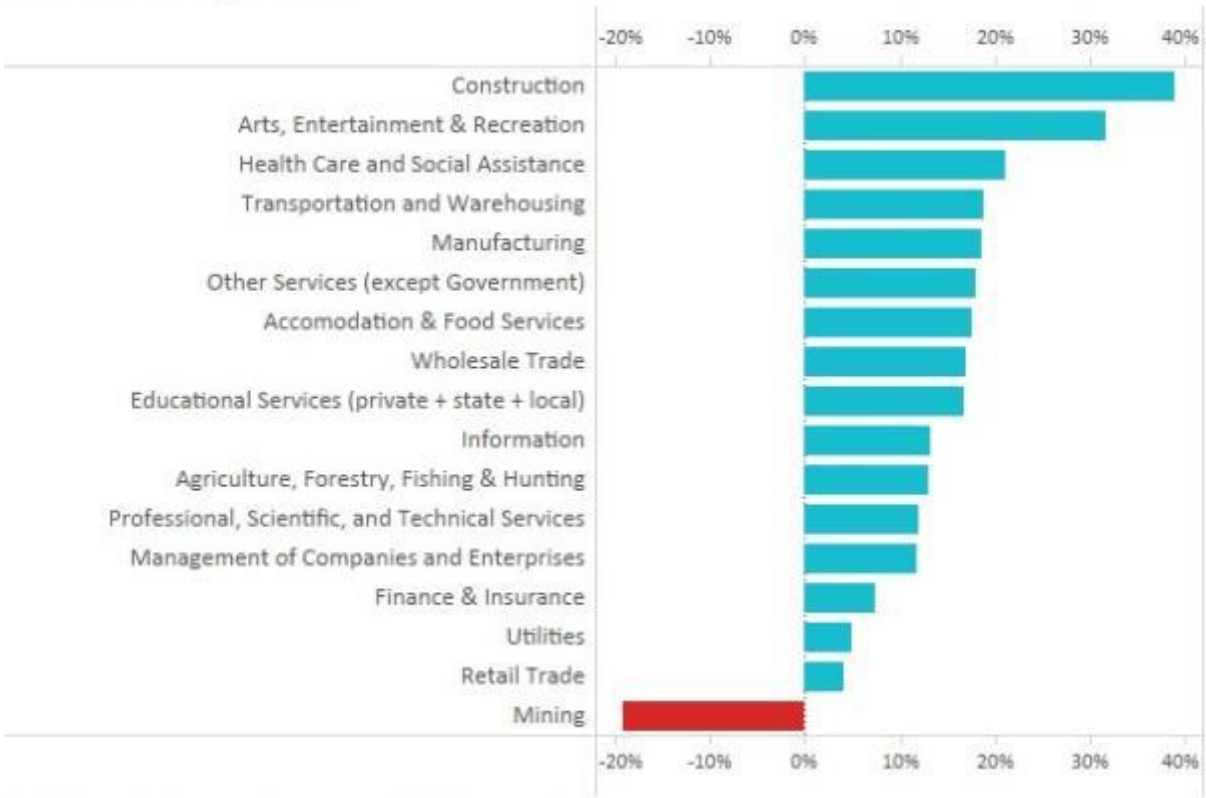


Figure 2. Idaho's industries growth projections from 2020 - 2030.

Most of these industries are already among Idaho's largest. However, the new emerging and revitalized industries could be identified as: arts, entertainment and recreation, and transportation and warehousing. Each of these emerging industries are projected to add more than 3,000 jobs to its work force by 2030. An analysis of the growth in each industry sector follows.

Construction: Construction employment is projected to have the largest percentage growth at 39 percent, resulting in the addition of 21,132 new jobs. More than half of the new jobs will be in specialty trades including painting, electrician, and plumbing businesses. Heavy and civil engineering construction will have the smallest uptick at 1,050 jobs. With the high demand for new homes and rapid growth in the state, jobs in both nonresidential and residential building construction are predicted to increase by over 8,450. Construction employment in 2030 is projected to be 75,468. Sixteen construction occupations are in the top 100 high demand. First-line supervisors of construction trades and extraction workers is the top 2nd in-demand occupation. Carpenters and electricians are in the top 50. Another five construction occupations are in the top 20. In 2021, the Research and Labor Bureau conducted a survey for a major nuclear construction project in eastern Idaho, working in conjunction with the Idaho Workforce Development Council to coordinate efforts for training the thousands of construction workers projected to be needed for this project over the next 10 years.

Arts, Entertainment & Recreation: Employment in the Arts, Entertainment & Recreation industry ranked as having the second highest projected percent growth by 2030 at 32 percent. Employment in this industry is projected to add 3,834 new jobs over the next nine years from sub-sectors including amusement, gambling, recreation, performing arts, spectator sports, and museums/historical sites. More than two-thirds of the growth is projected to occur within occupations including amusement parks, fitness trainers, bartending, and waiters/waitresses. Performing arts and spectator sports are projected to add another 778 new jobs by 2030.

Health Care and Social Assistance: Over the long-term, the health care and social assistance sector is projected to add the most jobs at 23,156. However, it ranks third in percentage growth at 21 percent. The aging workforce and in-migration of retirees will continue to drive significant growth in this sector. Ambulatory health care services, which include doctor's offices, outpatient care centers, home health care and laboratories is projected to grow by nearly 27 percent, adding more than 12,000 jobs over the next 10 years. Hospitals – including general, surgical, psychiatric and substance abuse facilities – are projected to grow by 20 percent. Nursing homes and residential care facilities will add 1,400 jobs by 2030. Social assistance is projected to add nearly 2,600 jobs, growing 16 percent, as more individuals and families are seeking counseling services for the elderly and disabled, assistance with retraining, emergency food and shelter, and day care services. The growth and aging of Idaho's population will foster this industry's growth. Idaho's health care will grow about 21 percent between 2020 and 2030. This rapid growth in population has led to shortages in many health care occupations. Over 20 percent of the high demand jobs are in the health care industry with the education ranging from an associate degree to a professional degree.

Transportation and Warehousing: Transportation and warehousing— a component of the trade, transportation and utilities sector—makes up about 17 percent of the sector's employment. Transportation and warehousing ranks fourth in percentage growth at 19 percent but ninth in numeric growth, projected to add just under 4,800 jobs. Most of the growth will come from the transit and ground passenger transport. Passenger vehicle drivers is ranked as the 80th top in-demand job.

Manufacturing: Manufacturing struggled the first few years following the 2007 recession but rebounded after 2011. By 2030 employment is projected to reach over 80,000, an increase of over 12,000 jobs, ranking it fifth in percentage growth. Food processing will account for 18 percent of the growth, while the computer industry's employment is projected to increase by 21 percent.

Accommodation and Food Services: Accommodation and food services industries, the largest part of the leisure and hospitality sector, is projected to add more than 11,000 jobs between 2020 and 2030. Jobs in the food services industry will account for 80 percent of this growth. Job openings will include servers, food preparation and serving workers, counter attendants, dishwashers and cooks. Only restaurant cooks require more than short-term training. Most of these jobs require interaction with the public, so good people skills are of relevant importance. Growth in Idaho's population and increased tourism activity will contribute to the employment increase.

Wholesale Trade: Jobs in wholesale trade will expand by more than 5,000 over the next 10 years, a projected increase of 17 percent by 2030. New jobs in merchant wholesalers – which include motor vehicle parts and suppliers, professional equipment, and machinery – are projected to bring 5,800 new jobs by 2030. Wholesale electronic markets and merchant wholesalers of non-durable goods are both projected to experience a decline in projected jobs.

Education Services: By 2030, education services are forecast to add nearly 10,000 jobs, a 17 percent increase in both public and private schools from kindergarten through postsecondary. Education accounts for more than half of government jobs. As Idaho's population continues to grow, student populations will also rise. Although Idaho's economy is growing, schools continue to experience budget constraints. Some school districts have passed bond and levy elections to help ease local budgets and upgrade facilities and equipment, however, local school districts in many rural areas of Idaho continue to struggle with their budgets. For example, inadequate public-school facilities and equipment, along with overcrowding can be expensive to address, all of which may be a disincentive to new residents wanting to relocate to the area. The current budget pressures on public education will have a direct effect on the structure of Idaho's economy.

Growth Occupations

This section examines Idaho's occupations both in terms of net growth and relative growth. An occupation with large relative growth may not necessarily add a large number of jobs. Sixty-five of Idaho's top 100 in-demand occupations are projected to experience very high relative growth between 2020 and 2030, defined as an increase of 20 percent or more in total number of jobs. However, the majority of these high-growth occupations have less than 500 annual openings. Openings do not just come from the addition of new jobs but also from the need to replace workers that are exiting the occupation or leaving the labor force. Of the sixty-five fastest growing in-demand occupations with a projected growth of 20 percent or more, only five have at least 1,000 annual openings. Of the 20 fastest growing in-demand occupations, four have more than 100 new job openings and ten require more than a high school education. The four occupations with more than 100 new job openings include: carpenters, first-line supervisors of construction trades, electricians and HVAC and refrigeration mechanic and installers.

The state plans on addressing several technical assistance items identified by the federal review team after the plan's submission.

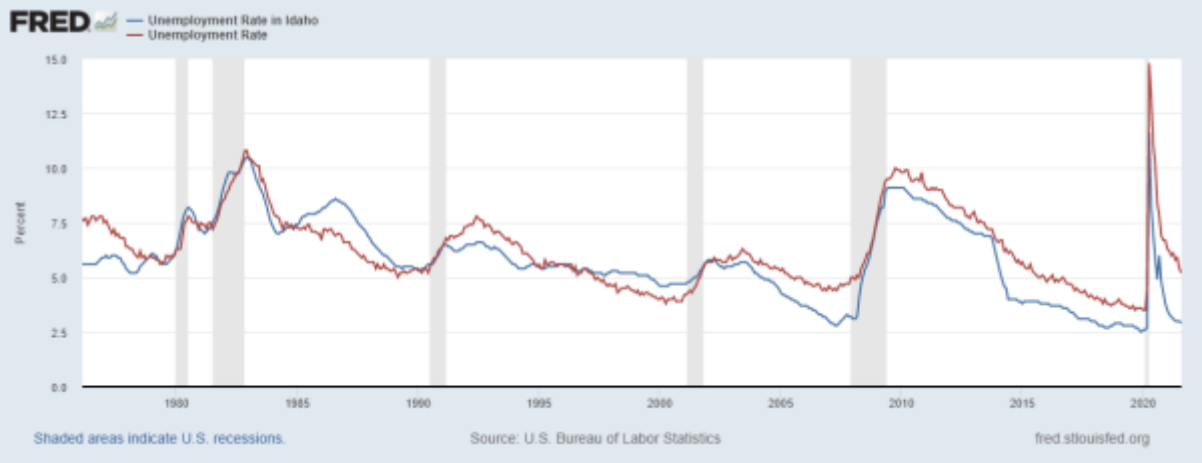
(i) EMPLOYMENT AND UNEMPLOYMENT TRENDS

General Employment Trends

In Idaho, jobs grew at a healthy pace from 2003 through 2006. By mid-2007, the growth began to slow and ended in August when the number of people employed began to decline and continued to decrease through mid-2009. The seasonally adjusted unemployment rate increased from a low of 2.9 percent in March 2007 to 9.6 percent in June 2009. However, following this sharp increase in the unemployment rate, Idaho's economy began to recover, and the unemployment rate steadily declined over the next several years to a record low of 2.5 percent in late-2019.

Following the emergence in COVID-19 in early 2020 and the Idaho Governor's Stay-at-Home order in response, Idaho experienced a sharp spike in unemployment, reaching a record high of 11.6 percent unemployment in April 2020. By the end of 2020, Idaho's economy showed signs of recovery, with unemployment rates declining to 3.8 percent by December. Idaho's unemployment rate has continued to remain below the national average since 2001. Figure 3 (below) shows the comparison of Idaho's seasonally adjusted unemployment rate to the national average.

Figure 3. Comparison of Idaho's Seasonally Adjusted Unemployment rate to the U.S. Average



Prior to COVID-19, Idaho's economy had been exhibiting strong healthy growth. The year-over-year number of employed workers increased, and the year-over-year number of unemployed

workers decreased each month since the recession ended in July 2009, with a few minor upticks early on in the recovery.

When Idaho's Governor enacted a Stay-at-Home order at the end of March 2020, Idaho's initial unemployment claims spiked from a typical level of 1,031 to nearly 33,000 within two weeks. Idaho's continued claims reached a peak of 71,794 claimants filing in early May of 2020. The industries most affected include accommodation and food service, health care and social assistance, and retail trade, together accounting for more than half of initial claims at the peak. One year later – in March of 2021 – initial claims in those three industries returned to near pre-pandemic levels, each having more than an 80 percent reduction.

Retail trade and health care account for the top two industries by projected employment in 2030. Since 2010, employment in health care and social assistance has increased 37 percent from 72,800 to 99,800; retail trade was reported at 93,200 in January of 2021, up more than 24 percent from 75,000 in 2010. While retail trade is projected to account for the second-most employment in the state, relative growth is projected to slow down to under 10 percent, less than half the relative growth from 2010 – 2020.

Top occupations held by unemployment claimants in December of 2020 include construction and extraction – accounting for 15 percent – building cleaning and maintenance, and transportation and material moving. Compared to December of 2019, the number of claimants in those occupations have increased by more than 10 percent.

Some characteristics of the unemployed are: 62 percent are male, 16 percent are Hispanic (by ethnicity), 53 percent are white and 59 percent are between the ages of 25 and 54. Most of these metrics are close to the demographic figures for the entire civilian labor force (employed and unemployed) with the exception of race. Idaho's civilian labor force is comprised of 90 percent workers who are white, a significantly higher proportion than the 53 percent of unemployed workers of the same race.

Overall Labor Force Participation

The labor force consists of individuals who are in the workforce employed or looking for work. Idaho's civilian labor force participation rate—percentage of civilians 16 years and over who are employed or looking or work—in 2019 was 63.2 percent, down from Idaho's highest participation rate of 70.0 percent in 2005. Idaho's labor force participation rates have consistently been above the national rates since 2010. In 2005 the state's participation rate was 70.0 percent compared to the national rate of 66.0 percent. Idaho's participation rate has been around 64.0 since 2013 except for 2014 when it was 63.1percent. The national rate has hovered around 62.9 during the same period.

The labor force participation rate varies by age group and gender. In the 1-Year American Community Survey 2019 estimates (2020 data was not released due to COVID-19), ages 25-54 had the highest labor participation rate at 81.3 percent. The next highest was ages 16-24 at 67.4 percent. Men had a participation rate of 68.2 percent and women 58.5 percent. Table 9 shows the labor participation rate by age and gender.

Table 9: 2019 Labor Force Participation Rates by Age and Gender (Population in Thousands)

	2019 Civilian Population	2019 Civilian Population Labor Force	2019 Labor Force Participation Rate
Population 16 and Over	1,386	877	63.2%

	2019 Civilian Population	2019 Civilian Population Labor Force	2019 Labor Force Participation Rate
16-24	215	145	67.4%
25-54	664	540	81.3%
55-64	219	141	64.3%
65 and older	288	51	17.7%
Population 20 to 64 Years	1,002	778	77.6%
Men	692	472	68.2%
Women	694	406	58.5%

Source: Census.gov, American Community Survey

Employment Trends by Population

The table below provides employment information for Idaho's labor force by age, race, and gender, taken from the U.S. Census Bureau's American Community Survey (ACS) five-year estimates for 2015-2019. This information provides insight into whether specific groups may face barriers to employment. Specific trends are discussed following Table 10.

This American Community Survey data is the only source for detailed information on unemployment rate by age, race and ethnicity.

Table 10: Idaho Labor Force by Age, Race and Gender

Population Subgroups	Total Population	Civilian Labor Force	Employed	Unemployed	Unemployment Rate
Total Population, aged 16 Yrs. & Older	1,327,132	828,116	792,237	35,879	4.50%
Age	Total Population	Civilian Labor Force	Employed	Unemployed	Unemployment Rate
16 to 19 years	96,966	45,373	38,548	6,825	17.70%
20 to 24 years	114,610	89,499	82,685	6,814	8.20%
25 to 29 years	114,370	89,932	85,322	4,610	5.40%
30 to 34 years	110,604	86,876	84,043	2,833	3.40%
35 to 44 years	214,214	174,713	169,469	5,244	3.10%
45 to 54 years	200,024	162,304	157,956	4,348	2.80%
55 to 59 years	107,070	77,870	75,672	2,198	2.90%
60 to 64 years	104,385	56,992	55,271	1,721	3.10%
65 to 74 years	160,197	38,057	37,048	1,009	2.70%

Population Subgroups	Total Population	Civilian Labor Force	Employed	Unemployed	Unemployment Rate
75 years and over	104,692	6,500	6,223	277	4.50%
Race and Hispanic or Latino Origin	Total Population	Civilian Labor Force	Employed	Unemployed	Unemployment Rate
White Alone	1,205,357	747,756	716,611	31,145	4.20%
Black Alone	8,317	5,252	4,804	448	8.50%
American Indian & Alaska Native Alone	17,859	10,435	9,475	960	9.20%
Asian Alone	20,022	12,421	12,042	379	3.10%
Native Hawaiian & Other Pacific Islander Alone	2,114	1,331	1,178	153	11.50%
Some Other Race Alone	43,399	31,271	29,979	1,292	4.10%
Two or More Races	30,064	19,650	18,148	1,502	7.60%
Hispanic or Latino Origin of any race	143,364	100,856	95,712	5,144	5.10%
White Alone, not Hispanic or Latino	1,115,497	684,818	657,137	27,681	4.00%
Gender (Civilian Labor Force)	Total Population	Civilian Labor Force	Employed	Unemployed	Unemployment Rate
Male	660,777	448,460	428,611	19,849	4.40%
Female	666,355	379,656	363,626	16,030	0.00%

Source: Census.gov, American Community Survey

As Table 10 shows, the largest age cohort for Idaho workers is those 35 to 44 years old. The age group experiencing the highest unemployment rate is teens 16 to 19 years old, while the group with the lowest unemployment rate are 45 to 54 years old.

It is important to note that the youth listed in this table are those who are part of the workforce and actively looking for work. The state is implementing several strategies designed to increase employment, education and skill attainment opportunities for this youth demographic.

During the five-year period (2015-2019) more than 90 percent of Idaho's labor force is White alone, and this group has an unemployment rate of 4.2 percent—the third lowest among racial and ethnic groups. The lowest unemployment rate was among Asian alone at 3.1 percent. Native Hawaiian and Other Pacific Islander alone make up the smallest portion of Idaho's labor force at 0.1 percent and yet have an 11.5 percent unemployment rate – the highest of all racial groups. American Indian and Alaska Native alone as well as Black experienced the next highest unemployment rates, at 9.2 and 8.5 percent, respectively.

People of Hispanic or Latino origin—a designation which crosses multiple racial groups—represent 12 percent of Idaho's workforce and had an unemployment rate of 5.1 percent.

Men in the workforce were unemployed at a rate of 4.4 percent compared to 4.2 percent for women.

Military veterans, another important demographic group in Idaho, totaled 116,157 according to the American Community Survey 2015-2019 data. Nearly 95 percent of Idaho's veterans are White, and males account for 92 percent while 36 percent are between the ages of 35 and 64. This group is well educated with nearly 30 percent having a bachelor's degree or higher. The unemployment rate for veterans was 4.4 percent, more than 50 percent higher than the state's average unemployment rate in 2019.

Idaho is home to five Indian reservations - the Coeur d'Alene and the Kootenai (both in northern Idaho), the Nez Perce (north central Idaho), the Shoshone-Paiute (Duck Valley on the Idaho-Nevada border) and the Shoshone-Bannock (Fort Hall in southeastern Idaho). Total reservation population for Idaho is 33,377 and includes a variety of races outside of Native American. The largest race is White at 21,950, or 66 percent of the total reservation population. The American Indian and Alaska Native population is second with 8,933, or 27 percent. Most of the workers are in management, business, science and arts occupations. Education services, health care and social assistance provide the largest number of jobs at 2,758. Arts, entertainment and recreation, and accommodations and food services have the second largest number of jobs with over 1,661. Four other industry groups—agriculture, forestry, fishing, hunting and mining; manufacturing; retail trade; and public administration (government) employ more than 1,000 workers. One-third of the reservations' population 25 years and over has a high school diploma or equivalency. Over 68 percent have some college or more.

Employment by Poverty Status

In 2021, the federal poverty guideline is $12,880 for a 1-person household and increases by $4,540 for each additional household member. In Idaho, the 5-year ACS estimates reveal that 141,903 — or 10.4 percent of Idahoans —were living in poverty. Of those individuals, 56 percent were female. Slightly less than half (45 percent) of persons living below the poverty threshold were in the labor force — 89 percent of whom were actively employed and the remaining 11 percent unemployed but looking for work. The remaining 55 percent of persons in poverty were not in the labor force. This contrasts with the 90 percent of Idahoans with income at or above poverty level. For those above the poverty level, more than 65 percent of persons were considered in the labor force, with 97 percent of those actively employed. The unemployment rate of persons living below the poverty threshold was more than 4 times higher than those not living in poverty. Table 12 outlines the labor force participation of persons by poverty status.

Table 11: Labor Force by Poverty Status

	Total	Percent	Labor Force Participation Rate	Employed	Unemployed	Unemployment Rate

	Total	Percent	Labor Force Participation Rate	Employed	Unemployed	Unemployment Rate
Below Poverty Level	141,903	10.4%	45.9%	57,967	7,099	10.9%
Above Poverty Level	1,214,936	89.6%	66.5%	787,133	21,331	2.6%

SOURCE: American Community Survey 5-Year Estimates: 2019

Idahoans with Disabilities

The Workforce Innovation and Opportunity Act calls for enhanced services and opportunities for individuals with disabilities in the workforce system. The information below provides a deeper look at Idaho's population of people with disabilities and the employment trends therein. Data is sourced from the American Community Survey estimates unless otherwise noted.

The number of people with disabilities in Idaho is growing. The American Community Survey one-year estimates of individuals with disabilities in Idaho increased from 204,780 in 2014 to 241,391 in 2019, representing an increase of 17 percent over five years, which is a faster rate of increase than the general population growth. An increase in disability awareness may also be contributing to the rise in numbers.

According to data from the 2019 American Community Survey, 12.7 percent of Idaho civilians living in the community report having a disability, including 10.5 percent of residents of working age (18-64). The prevalence of disability in Idaho roughly corresponds to that of the United States, with estimates all within one-percentage point each of the past eight-years, with the exception of 2015.

Table 12: Civilians Living in the Community by Age and Disability Status

Civilian Population	Total	Population With Disability	Percent	Population Without Disability	Percent
US Population	323,120,678	41,089,958	12.7%	282,030,720	87.3%
Idaho Population	1,764,911	241,391	13.7%	1,523,520	86.3%
Under 5 Years	115,837	1,063	0.9%	114,774	99.1%
5 to 17 Years	332,592	20,065	6.0%	312,527	94.0%
18 to 34 Years	393,026	35,011	8.9%	358,015	91.1%
35 to 64 Years	639,586	86,897	13.6%	552,689	86.4%
65 to 74 Years	172,552	42,440	24.6%	130,112	75.4%
75 Years and Over	111,318	55,915	50.2%	55,403	49.8%

SOURCE: American Community Survey 1-Year Estimates: 2019

The table above demonstrates that the percentage of Idahoans who experience disability varies significantly by age. While this variance can be attributed to a number of factors, in general this rate increases over time with substantial increases both early in life as congenital disabilities are initially identified, and later in life as disabilities are acquired through events or emerge due to the natural aging process. This trend is illustrated in Table 12 above, with only 6.0 percent of individuals aged 5 to17 experiencing disability compared to 13.6 percent for those aged 35 to 64 and 34.6 percent for those aged 65 or older. Because the 35 to 64 age group is quite large, the variance within that group is large as well: around half as many individuals age 18 to 34 experienced a disability.

When conducting its research, the American Community Survey includes questions related to six disability categories. Residents are asked if they have difficulty in any of the following areas:

- Hearing: deaf or having serious difficulty hearing.
- Vision: blind or having serious difficulty seeing, even when wearing glasses.
- Cognitive: difficulty remembering, concentrating, or making decisions due to physical, mental, or emotional problem.
- Ambulatory: serious difficulty walking or climbing stairs.
- Self-care: difficulty bathing or dressing.
- Independent living: difficulty doing errands alone such as visiting a doctor's office or shopping due to physical, mental, or emotional problem.

Table 13 provides information about the prevalence of these various disability types in Idaho. Self-report of disability category can include responses in multiple categories and therefore exceed 100 percent. The presence of co-occurring disabilities has a negative relationship with competitive, integrated employment.

Table 13: Civilians Aged 18 to 64, Living in the Community by Disability Type

Disability Category	Number of Idahoans Reporting a Disability	Percent of Idaho's Total Population (18-64)	Percent with a Disability Reporting a Disability within a Category
Hearing	27,334	2.6%	2.4%
Vision	22,142	2.1%	18.2%
Cognitive	56,065	5.4%	45.9%
Ambulatory	51,911	5.0%	42.5%
Self-Care	16,493	1.6%	13.5%
Independent Living	38,429	3.7%	31.5%

SOURCE: American Community Survey 1-Year Estimates: 2018 (Table B18120)

Table 14: Employment Status by Disability Type

Disability Type	Total Population	Number Employed	Number Unemployed	Unemployment Rate for those in Labor Force	Number Not in Labor Force	Percent Not in Labor Force

Disability Type	Total Population	Number Employed	Number Unemployed	Unemployment Rate for those in Labor Force	Number Not in Labor Force	Percent Not in Labor Force
Cognitive	56,065	19,977	2,066	10.3%	34,022	60.6%
Hearing	27,334	16,445	822	4.9%	10,067	36.8%
Self-care	16,493	2,783	218	7.8%	13,492	81.8%
Vision	22,142	11,302	218	1.9%	10,622	48.0%
Ambulatory	51,911	16,026	1,455	9.1%	34,430	66.3%
Independent living	38,429	9,189	1,069	11.6%	28,171	73.3%
All Disabilities	121,908	54,417	4,007	7.3%	63,484	52.1%
No disability	910,704	727,649	22,429	3.1%	160,626	17.6%

SOURCE: American Community Survey 1-Year Estimates: 2019

Table 14 shows the employment status of Idahoans by self-reported disability type. Variation in employment between disability categories is substantial. For example, those individuals with hearing impairments participate in the labor force at a rate of 63 percent, and of those only 4.9 percent are unemployed. Whereas those with a cognitive disability participate in the labor force at a rate of 39 percent, and 10.3 percent of this collection are unemployed. When taken as a total group, Idahoans with disabilities participated in the labor force at a rate of 48 percent, compared to 82 percent for people without disabilities, and the unemployment rate for Idahoans with disabilities was 7.3 percent, on average, compared to 3.1 percent for those without disabilities.

Disability is also strongly associated with poverty: 24.7 percent of Idahoans below age 65 having a disability fall below the poverty threshold (ACS, 2019 1-year estimates).

Finally, it is worth noting that a significant percent of Idaho's growth can be attributed to people moving to the state. Further analysis of population trends by age across time suggest a significant portion of Idaho's population growth can be attributed to people age 65 and over moving to the state to enjoy a comparatively cheaper cost of living during retirement. These individuals, due to their age, are more likely to report experiencing a disability, and are less likely to be seeking employment than Idaho's population on average. This trend is illustrated by a significantly reduced poverty rate for Idahoans with disabilities in retirement age, (8.8 percent for ages 65-74 and 8.3 percent for ages 75 years and over). Compared to the 2014 1-Year ACS estimates, both age groups have seen reductions in poverty rate from 13.8 and 9.9 percent, respectively. Those Idahoans with disabilities between 18-65 experience far higher rates of poverty, with all working age cohorts' poverty rates ranging between 23 and 32 percent.

(ii) LABOR MARKET TRENDS

This part of Section (II)(a)(1)(B) discusses general trends regarding Idaho's population and workforce, a discussion of in-migration to our state, as well as trends and changes in Idaho's population demographics. It also examines wage and income information, and finally, trends relating to Idaho's job market.

General Population Trends

Idaho's economy and workforce have historically been, and continue to be, impacted by the state's geography and population distribution. Idaho is a large, sparsely populated state with a 2020 census population of 1.839 million spread across more than 82,000 square miles. Idaho's average population density is 21.9 persons per square mile, though the population tends to cluster within the six urban counties, Ada, Canyon, Kootenai, Bonneville, Bannock and Twin Falls. The density in these counties is over 140 persons per square mile while density in the rest of the state is only 7.9 people per square mile. Ada County has the highest density at 424 persons per square mile. Camas County, one of Idaho's smaller counties, has the smallest density at 6 persons per 10 square miles. The rural areas, often separated by large distances, mountain ranges and rivers from the nearest urban hubs, pose a challenge for service access and require special consideration in creating any statewide system.

The steady shift of Idaho's population from rural counties to urban counties continues. From 1920 until 1972, the population in rural Idaho exceeded that of urban counties. However, from the 1970s on a new demographic era began as people increasingly moved from more rural to less rural areas resulting in increased concentrations in what today are Idaho's six most populous counties. The population of those six counties account for nearly two-thirds of the state's total population while one third is distributed among the other 38 counties.

The six urban counties had a combined population of 1,198,462 in 2020, accounting for more than 75 percent of the growth in the state's population since 2019 and 65 percent of overall population. Idaho's largest county, Ada, is located in Southwest Idaho. It is the only county with a population over 400,000.

Idaho had four counties with a population of 10,000 or more that ranked nationally in the top 100 counties for percentage growth between years 2010 – 2020. These include Madison (41 percent), Ada (26 percent), Kootenai (23 percent) and Canyon (22 percent).

Idaho's population and economy are expected to see continued growth. The forces that drove Idaho's expansion prior to the recession still exist as they did in the 1990s. Population has grown primarily through in-migration of people attracted by Idaho's quality of life—despite wage and income levels that rank near the bottom of the states. Many of those coming to Idaho are retirees over the age of 65. Increasing population—and an aging population—create more demand for goods and services, which has led to the predominance of the service sector. Our aging population has also increased demand for occupations in the health care industry.

Idaho's population has grown 44 percent since the turn of the century. The 2020 decennial census, showed the continuation of Idaho's strong growth with a 2.9 percent increase, making it one of the fastest-growing states in the US. Its growth was much faster than the national growth rate of 1.0 percentage points. It was similar to the state's peak growth rate in the 2000-2010 decade, occurring in 2006 just before the recession, and more than four times the growth rate in the recession decade of the 1980s. Idaho's population increased by 52,041 in 2020 to 1,839,106. Idaho ranks 38th among the states in overall population, up two compared to the 40th most populous ranking in 2010.

In-Migration

Idaho's net migration during 2020 was 30,961 or 82 percent of the population growth while the rest of the population growth was due to the difference between births and deaths. This much growth through in-migration sets the state as one of the fastest recipients of population growth, primarily from the surrounding states and California.

In 2020 more people moved into 40 of Idaho counties than moved out. The increase from net migration ranged from 12,519 in Ada County to just 7 in Power County. Four counties—Caribou, Custer, Lemhi, Lewis — experienced negative migration, where 70 more total people left than moved in. The 14 counties that make up Idaho's metropolitan areas accounted for 87 percent of the state's net migration.

As the state attracts new businesses and local companies expand, in-migration is expected to increase as Idaho's economy continues its growth. With the creation of additional jobs, more local job seekers stay in Idaho, reducing out-migration. At present, there is a shortage of workers and a need for an influx of a skilled workforce into the state.

The table below shows in-migration between 2010 and 2020. The recession caused the drop in net migration from 2009 to 2010. Domestic in-migration and out-migration consist of moves where both the origin and destination are within the United States. International migration accounts for any change of residence across the borders of the United States and Puerto Rico. Net international migration is estimated in four parts:

- Foreign born
- Between the United States and Puerto Rico
- Natives to and from the United States
- Movement of the Armed Forces population between the United States and overseas

The largest component, net international migration of the foreign born, includes lawful permanent residents (immigrants), temporary migrants (such as students), humanitarian migrants (such as refugees) and people illegally present in the United States. After 2011 net migration increased primarily due to the international portion. However, since 2012 net migration increases are largely due to the domestic portion; international migration has since declined significantly following 2017.

Table 15: Idaho Net Migration, July 2010 through Jun 2020

Time Period	Net Migration	Domestic	International
July 2010	-194	-381	187
July 2011	2337	524	1813
July 2012	1035	-721	1756
July 2013	5574	3535	2039
July 2014	10059	8470	1589
July 2015	10065	6771	3294
July 2016	22168	18550	3618
July 2017	26857	25035	1822
July 2018	24864	24401	463
July 2019	29224	28466	758
July 2020	30961	30283	678

SOURCE: Annual Population Estimates, U.S. Census Bureau

International migration could be the reason that 10.8 percent of the population over the age of 5 speaks a language other than English – with the predominant language being Spanish. Of those who speak a language other than English, nearly 45 percent were foreign-born, 17 percent have incomes below the poverty level and 30 percent have less than a high school education.

Demographic Trends

According to Economic Modeling Specialists International (EMSI) – a labor market analytics and economics firm – Idaho's population is expected to grow by 18 percent from 2020 to 2030 (Table16a). In the same period, Hispanics, the state's largest minority, will grow much faster at 33 percent (Table 16b).

Over the next decade however, the major demographic impact in Idaho will come from the aged. Although Idaho has a higher percentage of workers aged 24 and younger than the rest of the country, the state will not be immune from an aging labor force as workers age 55 and older leave the workplace. This will encourage employers to provide a work environment that entices experienced and highly skilled workers to remain on the job and in the state.

The overall composition of the population is also changing. Projections indicate that Idahoans aged 60 to 64 years will decrease by 1 percent while age groups 65 and older will all increase by 15 percent or more. The age group 55 to 59 will have the smallest growth at only 2 percent. The second and third smallest growth rates will be in the 10 to 14-year-old at 3 percent, and 15 to 19-year-old at 8 percent. Over time, this may mean fewer workers aging into the labor force to replace those aging out. While this trend was somewhat evident between 2000 and 2010, it will become much more pronounced as the youngest in the baby boomer generation pass the threshold of 65 in the present decade. Even with an expanding cadre of older workers, Idaho has a relatively large number of young people entering or soon to enter the labor force.

Table 16: Projected Population by Age for Idaho, 2020-2030

	2020	2030	Percent Change
Total Population	**1,826,913**	**2,148,168**	**18%**
Age			
Under 5 years	113,848	137,818	21%
5 to 9 years	125,055	139,107	11%
10 to 14 years	132,772	136,595	3%
15 to 19 years	127,139	137,227	8%
20 to 24 years	119,974	134,146	12%
25 to 29 years	122,723	135,302	10%
30 to 34 years	118,855	137,615	16%
35 to 39 years	120,252	144,479	20%
40 to 44 years	113,978	139,533	22%
45 to 49 years	104,222	134,175	29%
50 to 54 years	101,277	121,866	20%
55 to 59 years	109,050	111,586	2%
60 to 64 years	111,774	110,442	(1%)
65 to 69 years	102,392	117,943	15%
70 to 74 years	83,550	112,655	35%
75 to 79 years	55,797	90,659	62%

	2020	2030	Percent Change
80 to 84 years	33,841	61,806	83%
85 years and over	30,414	45,214	49%

SOURCE: Economic Modeling Specialist, Inc. (EMSI)

Table 16(b): Projected Population by Age for Idaho, 2020-2030

	2020	2030	Percent Change
Total	**1,826,913**	**2,148,168**	**18%**
White, Non-Hispanic	1,487,564	1,692,466	14%
White, Hispanic	209,735	279,053	33%
Two or More Races, Non-Hispanic	38,476	53,161	38%
Asian, Non-Hispanic	27,095	38,617	43%
American Indian or Alaskan Native, Non-Hispanic	19,438	22,246	14%
Black, Non-Hispanic	13,793	19,841	44%
American Indian or Alaskan Native, Hispanic	12,398	14,366	16%
Two or More Races, Hispanic	9,137	13,345	46%
Native Hawaiian or Pacific Islander, Non-Hispanic	3,275	5,213	59%
Black, Hispanic	2,978	4,618	55%
Asian, Hispanic	2,187	3,579	64%
Native Hawaiian or Pacific Islander, Hispanic	837	1,662	99%

SOURCE: Economic Modeling Specialist, Inc. (EMSI)

GDP and Personal Income

Another major economic factor in Idaho is wages and income. Although Idaho has a low unemployment rate, the state also tends to have lower average wages compared to the rest of the nation. Low wages may be attractive from the perspective of operating a business, but they also make it difficult to attract highly skilled workers. Idaho's low average wages can be attributed in large part to the relatively high share of jobs in the food service and retail sectors, where pay is typically low.

Personal income and gross product are indicators for measuring the business activity in a state and a broad measure of the state's economic wealth. The U.S. Bureau of Economic Analysis

(BEA) defines personal income as "the income that people get from wages and salaries, social security and other government benefits, dividends and interest, business ownership, and other sources." As indicated in Table 17, personal income and gross state product rebounded in 2010 with consistent annual increases. In 2020, Idaho's gross domestic product experienced the smallest increase since 2010, at 1.7 percent. However, total personal income for 2020 increased by 9.2 percent, the highest year-over-year change in the past decade. The BEA notes that this sharp increase in personal income from 2019 to 2020 reflects the additional income received through CARES Act pandemic relief payments.

Table 17: Idaho Gross Product and Personal Income 2008-2020 (in thousands)

Year	Gross Domestic Product	Percent Change from Previous Year	Total Personal Income	Percent Change from Previous Year
2008	$55,546		$50,205	
2009	$53,775	-3.2%	$48,477	-3.4%
2010	$55,171	2.6%	$50,197	3.5%
2011	$56,488	2.4%	$53,083	5.7%
2012	$57,764	2.3%	$56,140	5.8%
2013	$61,018	5.6%	$58,338	3.9%
2014	$63,522	4.1%	$61,827	6.0%
2015	$66,004	3.9%	$65,825	6.5%
2016	$69,029	4.6%	$68,445	4.0%
2017	$72,723	5.4%	$72,355	5.7%
2018	$77,052	6.0%	$77,012	6.4%
2019	$82,420	6.9%	$81,565	5.9%
2020	$83,822	1.7%	$89,078	9.2%

SOURCE: Bureau of Economic Analysis

Job Market Trends

Idaho's industrial make-up shifted since the 2007 recession. The jobs losses between 2007 and 2010 primarily came from construction and manufacturing, while many of the jobs gains between 2010 and 2020 came from health services and social services (25,200). This was followed by a rebound in construction (24,400) and manufacturing (14,800). Other industry sectors that have recorded job growth in excess of 10,000 are accommodation and food services (14,800), retail trade (13,500), and professional and technical services (13,200).

In comparison to all 2020 job openings, the demand for registered nurses topped the list, which was significantly impacted by the COVID-19 pandemic and exacerbated by the need for healthcare workers overall. Following this were low-wage low-skill jobs in the customer-service and retail industry. However, although current economic projections rank healthcare and social assistance and retail trade as holding the bulk of jobs in 2030, retail trade is projected to have the slowest growth of all industries from 2020 – 2030 at just under 5 percent . This is a significant shift from earlier years that projected large growth in retail trade, with the model conceivably now factoring in the current retail shift to online sales.

Despite the retail closures, a review of Idaho's real-time labor market information from Help Wanted Online for 2020 shows continued demand for retail workers. There was an average of 640 job openings for first-line supervisors of retail sales workers and 896 openings for retail salespersons, with an average time of fill of 36 and 33 days, respectively.

Although manufacturing jobs have increased, the types of jobs available within the industry are projected to grow at different rates. Between 2020 and 2030, computer and electronic manufacturing is projected to grow by more than 20 percent. While food manufacturing represents the largest share of job in the industry, it is projected to grow by 12 percent.

Health care has continued to grow irrespective of economic conditions. There has been a continuous need for occupations at all skill levels, from certified nursing assistants to primary care physicians. According to Help Wanted Online, registered nurse is the hardest job to fill in Idaho - with an average of 1,784 openings in 2020 with an average time to fill of 39 days. After registered nurses, customer service representatives had an average of 993 openings, about 25 percent less than registered nurses. However, they ranked fifth in hard to fill with an average of 327 monthly openings.

Retail salesperson were high on both the monthly listings and hard-to-fill lists. Additionally, truck drivers are consistently in the top ten jobs listing.

Unlike health care, the construction industry is highly affected by the economy. The recession had a devastating effect on this sector - dropping from nine percent of all jobs in 2006 to five percent in 2010. Although construction jobs account for only seven percent of total nonfarm jobs in 2020, the number of jobs has increased 78 percent since 2010, including 24 percent in the past three years alone.

(iii) EDUCATION AND SKILL LEVELS OF THE WORKFORCE

This part of Section (II)(a)(1)(B) outlines trends in Educational Attainment for Idaho's general population, as well as for specific populations with barriers, where data is available. All data is obtained from the American Community Survey 5-year 2015-2019 data.

Educational Attainment - General Population

In Idaho, a sizable portion of the population completes their high school education. About 87 percent of the 18-24 age group and 91 percent of 25 and older have at least a high school diploma. However, as discussed further in the following sections, the trend towards high school graduation does not necessarily apply to specific populations with barriers to employment.

While high school participation is generally high, participation drops off at the post-secondary level. About 44 percent of the 18-24 age group have some college or an associate degree, and 6.9 percent have a bachelor's degree or higher. For those age 25 and over, 26 percent have some college but no degree, 9.8 percent have an associate degree, and 27.6 percent have a bachelors or higher. In other words, the majority of Idaho's youth graduate from high school, while just over half (51 percent) of young adults age 18-24 participate in post-secondary education. And a little more than one third (39 percent) of Idaho's adults have an associate degree or higher.

Educational Attainment - By Race

The American Community Survey Data provides educational attainment by race for the groups listed below. While races other than white, in combination, make up only 8 percent of the state's population over the age of 25, these groups do have significant variances in Educational Attainment that are worth noting. For example, among Asians, 43 percent hold a bachelor's degree, compared to the next highest group at 28 percent (White alone). Among those who self-identify as "Some other race," 44 percent have less than a high school diploma.

For Hispanics, which includes all races, the educational attainment data shows about 35 percent have less than a high school education

Table 18: Educational Attainment by Race

Racial Group	Race Population	% of State Population	% of Race with Less than High School Diploma	% of Race with High School Diploma or Higher	% of Race with Bachelor's or higher
Total State Population 25 and Over	1,115,556	100%	9%	91%	27%
White alone	1,023,717	92%	8%	92%	28%
Black or African American alone	5,476	1%	9%	91%	26%
American Indian and Alaska Native alone	14,686	1%	15%	85%	13%
Asian alone	16,561	2%	12%	88%	43%
Native Hawaiian and Other Pacific Islander alone	1,663	0.1%	7%	93%	23%
Some other race alone	32,365	3%	44%	56%	6%
Two or more races:	21,088	2%	11%	89%	28%
Hispanic or Latino (All Races)	106,974	10%	35%	65%	10%

SOURCE: American Community Survey 1-Year Estimates - 2019

Educational Attainment - Individuals Age 55 and Over

According to data from the American Community Survey 2019 1-year estimates, individuals at ages 55-64 participate in Idaho's workforce at a rate of 64 percent, making up nearly 16 percent of Idaho's total workforce. Individuals aged 65 and older participate in the workforce at a much lower rate of 17 percent, but they make up 5 percent of the overall labor force in the state. When combined, these two groups make up nearly 21 percent of Idaho's total workforce; depicting an aging labor force.

While older individuals participate in the workforce at a lower rate than their younger counterparts, they have a relatively comparable mix of educational attainment. The education levels of older individuals in Idaho are generally comparable with those of other age groups. The primary difference is that individuals over the age of 65 are less likely to have an associate degree at 9 percent; the lowest of the age groups (25+) from Table 19a.

Younger age groups have a higher proportion of bachelor's degree achievement, as more than 20 percent of the 25 – 44 age group obtained this certification. This is an increase of more than 5 percentage points compared to those 65 and older. The higher educational attainment is possibly a reflection of the greater educational demands of modern times.

Table 19a: Educational Attainment by Age Group by Percent of Total

	18 to 24 Years	25 to 34 Years	35 to 44 Years	45 to 64 Years	65+
Total	**166,713**	**234,800**	**225,804**	**421,776**	**288,617**
Less than 9th grade	2%	2%	3%	3%	3%
9th to 12th grade, no diploma	10%	5%	5%	6%	6%
High school graduate (includes equivalency)	38%	29%	23%	25%	28%
Some college, no degree	37%	26%	24%	26%	27%
Associate's degree	6%	10%	11%	12%	9%
Bachelor's degree	7%	21%	22%	17%	16%
Graduate or professional degree	1%	6%	11%	10%	12%

SOURCE: American Community Survey 1-Year Estimates - 2019

Educational attainment by gender actually varies by age group - while younger males exhibit higher rates of high school graduation; females have higher levels of educational attainment. The same holds true for the 25 to the 64 age groups. The 65 and older cohort shows a different kind of educational attainment trend where males hold larger educational accomplishments (Table 19b).

Table 19a: Educational Attainment by Gender/Age Group by Percent of Total

	Male, 18-24	Female, 18-24	Male, 25-34	Female, 25-34	Male, 35-44	Female, 35-44	Male, 45-64	Female, 45-64	Male, 65 +	Female, 65 +
Less than 9th grade	1%	2%	2%	3%	3%	3%	4%	3%	3%	3%
9th to 12th grade, no diploma	12%	9%	6%	4%	7%	4%	7%	5%	5%	7%
High school graduate (including equivalency)	41%	34%	32%	25%	27%	19%	27%	23%	27%	29%
Some college, no degree	36%	37%	25%	28%	23%	25%	25%	28%	25%	28%

	Male, 18-24	Female, 18-24	Male, 25-34	Female, 25-34	Male, 35-44	Female, 35-44	Male, 45-64	Female, 45-64	Male, 65 +	Female, 65 +
Associate's degree	5%	8%	9%	11%	10%	13%	11%	12%	9%	9%
Bachelor's degree	5%	9%	19%	24%	20%	23%	16%	19%	18%	15%
Graduate or professional degree	0%	1%	6%	6%	11%	12%	11%	10%	15%	9%

SOURCE: American Community Survey 1-Year Estimates - 2019

Educational Attainment - Low-Income Individuals

About nine percent of the population age 25 and older have income levels below poverty, with 21 percent of those attaining less than a high school diploma falling into this category. This is more than five times the rate of those holding bachelor's degrees. This data (Table 20), reinforces this belief that obtaining a high school credential is an important first step towards escaping poverty, and that continuing towards post-secondary education provides important additional opportunities to improve quality of life and well-being. More than 90 percent of people holding a high school credential or higher remain out of poverty status.

Table 20: Educational Attainment by Poverty Status

Income Level	Less than High School	High School Graduate	Some College or Associate	Bachelor's or Higher
Number Below Poverty	20,090	30,577	35,925	12,594
Percent Below Poverty	21%	10%	8%	4%
Number at or Above Poverty	77,621	266,981	388,604	322,797
Percent at or Above Poverty	79%	90%	92%	96%

SOURCE: American Community Survey 1-Year Estimates - 2019

Educational Attainment - English Language Barriers

Approximately 12 percent of Idaho's workforce speak a language other than English at home. Of this group, those with limited English proficiency participate in the workforce in a larger proportion than their English-only speaking counterparts.

The most significant difference between these two populations is their education level, specifically the attainment of a high school education. For those in the workforce who speak only English in the home, only 4 percent have less than a high school diploma compared to those in the workforce who speak another language at home, 30 percent have less than a high school diploma.

When the data is broken down further by specific languages (including Asian/Pacific Island, Indo-European, Spanish, and Other), an even greater discrepancy emerges. For those in the workforce who speak primarily Spanish in the home, 36 percent have less than a high school

diploma. This is especially significant in that Spanish speakers represent the largest minority and at the same time hold the largest majority (73 percent) of Idaho's non-English workforce population.

When taken in combination, these data indicate a significant skills gap for limited English proficient speakers in the workforce, especially for those who speak Spanish in the home.

Table 21: Educational Attainment by Language Spoken at Home for those in the Workforce

Language Spoken	Less than High School	High School Graduate	Some College or Associate	Bachelor's or Higher	Total
Speaks Only English (Number)	29,129	160,391	252,169	209,071	650,760
Speaks Only English (Percent of Total)	4%	25%	39%	32%	100%
Speaks Other Language* (Number)	27,363	23,232	21,906	20,198	92,699
Speaks Other Language* (Percent of Total)	30%	25%	24%	22%	100%

SOURCE: American Community Survey 1-Year Estimates - 2019 *Includes native English speakers who also speak another language at home, and other bilingual speakers.

(iv) SKILLS GAPS

Idaho's workforce development system seeks to prioritize its efforts around those industries and occupations that balance good wages with existing or projected demand for workers, as well as those industries which can have a larger overall weight on Idaho's economy. Such industries and occupations have been identified in Idaho's Target Sectors and Occupations-In Demand.

However, as described in Section (II)(a)(1)(A) of this plan, nearly 20 percent of Idaho's jobs in 2020 were in the combined industries of accommodation food services and retail trade. Many of these jobs pay relatively low wages, require relatively little training or education, and lack a significant multiplier effect on Idaho's economy. As a result, many of Idaho's workers are in jobs which may not sufficiently prepare them to move into the types of careers that require additional skills and pay better wages. As such, these workers will need to access training and education outside of their current workplace if they want to advance their skills or careers.

The analysis in Section (II)(a)(1)(A), coupled with education data and direct input from industry, lend strong support to the state's goals to increase educational attainment beyond high school. It is vital that Idaho's labor force seek educational opportunities or training to qualify for the jobs that will be available over the next 10 years. Of the top 50 hot jobs, 26 require a typical education of four-year degree or higher. Within the top 10, the following seven require some post-secondary education or training while three require a minimum of high school or equivalent (First-line Supervisors of Construction Workers, Hazmat Removal Workers, and Electricians).

- Construction Managers - Bachelor's Degree
- Dental Hygienists - Associates Degree
- Cost Estimators – Bachelor's Degree
- Registered Nurses – Bachelor's Degree
- Environmental Engineers – Bachelor's Degree
- Physical Therapists - Doctoral or Professional Degree
- Sales Engineers - Bachelor's Degree

In the most recent list of Idaho's In-Demand Occupations (2020), there has been a shift to construction-related positions now reflecting a larger share of the top 10 occupations, more than the 2018 estimates. This is likely in response to the rapid growth Idaho has experienced in recent years and the difficulty in recruiting workers.

Not only does the limited capacity of available training programs' ability to deliver appropriate training come into play, but their cost is one of the biggest challenges for Idaho workers in obtaining the training and education they need to meet the skill demands of the evolving job market.

Idaho workers' educational credentials will need to increase in order to obtain higher-paying jobs. And yet, pervasive low wages can make it difficult for Idaho workers to access the training and education needed to upgrade their skills without the availability of additional financial resources. Addressing the affordability of college education, expanding the "learn while you earn" model and expanding registered apprenticeships may help address this opportunity gap, especially for populations with significant barriers to employment and education.

In 2019, the Research & Analysis Bureau collaborated with the Idaho Department of Transportation, Federal Highway Administration, Workforce Development Council and Associated General Contractors to conduct a highway construction skills gap report and compiled what survey respondents felt were the missing skills in job applicants. Most of the skills or soft skills were generalized and included math, reading, safety awareness, good work ethic, showing up on time, and communication and problem solving.

An enhanced focus on career pathways and stackable credentials may also help address this gap. Many jobs on the hot jobs list can be part of a career ladder and lend themselves to stackable credentials in education. A registered nurse could start as a certified nursing assistant or licensed practical nurse. A construction manager could gain skills while working as a first-line supervisor. A dental hygienist could work while going to school to be a dentist and have inside knowledge of the job. Idaho's work on career ladders and stackable credentials is addressed in Section (II)(c)(1).

Finally, the analysis in Section (II)(B)(i) shows that youth ages 16-24 have a much higher unemployment rate than other age groups. As teens and young adults are finding it harder to get jobs in the current labor market, fewer are learning the basics of how to hold on to a job or getting the opportunity to learn about various occupations and industries by working or interning in them. The strategies identified above may also be appropriate to address this cohort of workers.

2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

(A) The State's Workforce Development Activities

To provide a thorough overview of the current workforce development activities and delivery models taking place in Idaho, we have provided a program–by–program summary of core WIOA

programs as well as for those programs who will be submitting as part of the Combined State Plan. Where possible, we have also solicited information from our One–Stop partners who are not submitting as part of the Combined State Plan and have included this information as well. A comprehensive discussion of strengths, weaknesses, and capacity will be covered in the subsequent sections (B) and (C).

Title I - Youth Programs (Idaho Department of Labor)

Funded by the U.S. Department of Labor (USDOL), WIOA Title I-B offers programs for Youth, Adult and Dislocated Workers in Idaho. These programs help eligible individuals get good jobs and stay employed and help employers by improving the skills of Idaho's workforce.

Idaho's WIOA Title I-B Youth program serves out-of-school youth ages 16 to 24. Eligible young people work closely with a career planner to support them in achieving the education and skills necessary to enter the workforce. Services may include work-based learning opportunities through job shadowing, work experiences and internships, work skills training such as vocational classes or on-the-job training, and supportive services to help with the costs of transportation and other necessities.

The Idaho Department of Labor also administers a State-Operated Job Corps Demonstration Project in Nampa, Idaho, located in southwestern Idaho. Like the youth program, it also serves youth from 16-24, and is intended to increase access to and enrollment in education and work-based learning for out-of-school and at-risk Idaho youth by leveraging existing resources and programs to better serve Idaho youth in getting the education and training they need in high-demand fields.

Title I – Adult and Dislocated Worker Programs (Administered by the Idaho Department of Labor, operated by Equus Workforce Solutions)

The Adult and Dislocated Worker programs provide access to the same array of service categories as the state's Title I Youth program: basic and individualized career, training, and supportive services. Services are provided at the level needed to launch the adult or restore the dislocated worker to self-sufficient employment. Equus Workforce Solutions began providing these services in Idaho in October 2021.

For the Adult program, individuals lacking basic skills or receiving public assistance may be eligible. For the Dislocated Worker program, those who have lost their job through no fault of their own may be eligible. Dislocated Worker funds also support the Rapid Response program that provides immediate assistance to employers and workers for business closings and other mass layoff events.

Both Idaho Department of Labor and Equus staff provide these program services in the state's nine American Job Centers. The Idaho Department of Labor staffs various mobile locations, providing access to 47 additional communities across the state .

Title II - Adult Education and Family Literacy (AEFLA) (Idaho Career Technical Education)

The Adult Education program supports efforts to improve the quality of life for adults with academic skill levels below the 12th grade, and/or adults who need English language skills to succeed in their communities. Literacy, numeracy, and English language skills are fundamental for workforce success and personal and social well-being. Services provided under the Adult Education program are intended to lead to further education, training opportunities, and work.

The Adult Education program plays an integral role in the workforce development system by providing access to educational and training services for adult learners. The program seeks to increase opportunity in the educational and workforce development of adults as workers, parents, and citizens. While playing a critical role in adult attainment of a secondary school

diploma, the program also aims to assist in the transition to postsecondary education and training.

Currently, the program is carried out locally, on a regional basis, via the state's technical and community colleges, universities, as well as the State Department of Correction. Each local provider is responsible for offering Adult Education services, either through direct instruction or through distance learning models. Local programs conduct intake and assessment, ensure appropriate class placement, provide goal setting and education planning guidance, and follow up.

Title III - Wagner-Peyser/Employment Services (Idaho Department of Labor)

Employment services are designed to help connect job seekers and employers. Self-service is available at idahoworks.gov, an online labor exchange system where job seekers can register for work, search for job openings, and access a variety of job search resources. Additionally, employers can list jobs, search resumes, and link to labor market information and other resources.

Staff are available to assist job seekers with job search consulting and workshops; aptitude, interest, and proficiency tests; career guidance; and referrals to other workforce development services. Specialized services are available for veterans, migrant seasonal farm workers, and individuals with disabilities.

Employment services to employers include referring job candidates, promoting job openings, providing space at the American Job Centers for employers to conduct customized recruitment and hiring events; recruiting or matching applicants from local, state, and national labor pools; and organizing in-person or virtual job fairs. The Idaho Department of Labor provides these services in the same locations as its Title I-B offerings.

Title IV - Vocational Rehabilitation Services (Idaho Division of Vocational Rehabilitation and Idaho Commission for the Blind and Visually Impaired)

Vocational Rehabilitation services in Idaho are provided through two agencies: the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (the Commission). Both agencies serve individuals with disabilities that constitute or result in substantial barriers to employment. IDVR works with a diverse array of disabilities to include, but not limited to individuals with mental health disorders, learning disabilities, developmental disabilities, diabetes, deafness, amputation, mobility impairments, and traumatic brain injury. The Commission specifically serves individuals whose primary disability is blindness or visual impairments, including those who may experience co-occurring disabilities. Where co-occurring disabilities are present, the Commission partners with IDVR to the extent practicable.

IDVR and the Commission provide services which include counseling and guidance, assessment, vocational training, post-secondary education, transportation, personal assistance services, and job supports and placement. Through customer informed choice and in partnership with their VR counselor, individuals with disabilities are able to create an individualized plan for employment, maximize their potential, and reach the goal of competitive integrated employment. Services unique to the Commission include an Assessment and Training Center, Low Vision Clinic Services, and regional Rehabilitation Teachers who provide low vison and blind skills training to individuals in all communities in the state.

Both programs provide services to students and youth with disabilities to ensure they have meaningful opportunities to receive training and other services necessary to achieve employment. Pre-employment transition services for students and similar services for youth include job exploration counseling, work-based learning experiences (paid or unpaid), counseling on post-secondary enrollment opportunities, workplace readiness training, and

instruction in self-advocacy. Students are supported by a VR counselor to determine which combination of pre-employment transition services may best meet their individual needs. Pre-employment transition services are designed to help students with disabilities begin to identify career interests that may be further explored through additional VR services. Students must be receiving transition services through an Individualized Education Program (IEP) or be eligible for a section 504 accommodation to receive these services under the banner of Pre-ETS. Similar services are available and are afforded to out-of-school youth under the age of 25.

While the services provided by these two agencies to their specific customer base are similar, the delivery systems differ slightly. IDVR provides services through eight regional offices and a series of sub-offices. Through cooperative agreements, IDVR has several staff collocated in several state program offices, such as the Idaho Department of Correction. The Commission provides services through a central office in Boise, ID and five regional offices.

Combined Plan Partner - Jobs for Veterans State Grant Program (Idaho Department of Labor)

Veterans receive priority service for all U.S. Department of Labor workforce programs. In addition, Idaho Department of Labor has dedicated staff located in select American Job Centers throughout the state to provide targeted support for veterans.

Local Veterans Employment Representatives (LVER) program staff conduct outreach to employers on behalf of veteran customers. The LVER works with employers to develop job opportunities for veterans and promote the value of hiring veterans within the larger workforce.

The Disabled Veterans Outreach Program (DVOP) staff serves veterans most in need of intensive employment and training assistance. These staff focus on veterans with barriers to employment and other special workforce needs. DVOPs offer a wide range of workforce services to veterans and other eligible persons coordinated through a case management approach.

Combined Plan Partner - OAA Title V - Senior Community Service Employment Program (Idaho Commission on Aging)

The Senior Community Service Employment Program (SCSEP) is funded by the USDOL and administered by the Idaho Commission on Aging (ICOA). Easterseals-Goodwill is the sub-recipient and serves seniors 55 and older, that are unemployed and have an income at 125% or less of the Federal Poverty Level. Services include paid employment training at community service assignments, employment training counselors to provide job skill training, computer skills training, paid supportive services to help overcome barriers to employment, development of an individual employment plan, and financial assistance with annual physical exams.

Enrollment priority is given to veterans and qualified spouses, then to individuals who are over 65, have a disability, have low literacy skills or limited English proficiency, reside in a rural area, are homeless or at risk of homelessness, have low employment prospects, or have failed to find employment after using services through the American Job Center system. The program is designed to foster individual economic self-sufficiency and increase the number of people in unsubsidized employment.

SCSEP participants are placed in non-profit or government agencies called, "Host Agencies". Host Agencies include senior centers, community action centers, and health clinics. These agencies agree to provide employment training through community service activities that provide the education identified in the participant's individual employment plan. The program provides minimum wage, skill enhancement or acquisition of skills, personal and employment counseling, and assistance in obtaining unsubsidized employment.

Employment Training Counselors (ETC's) assist seniors to develop Individual Employment Plans and teach job seeking skills such as; interviewing, job searching, setting goals, and resume building. Currently, the emphasis is to provide technology training that will assist seniors to build marketable skills that are essential to the present workforce. A participant can be in the program 48 months; however, 12-month extension waivers are allowed for specific groups.

The ICOA and Easterseals-Goodwill provide compliance, monitoring, statewide goal setting, federal reporting, and program reimbursement.

Combined Plan Partner - Trade Adjustment Program (Idaho Department of Labor)

The Idaho Department of Labor administers the state's Trade Adjustment Assistance (TAA) Program, designed to assist U.S. workers who have lost or may lose their jobs because of foreign trade. This program seeks to provide affected workers with opportunities to obtain skills, credentials, resources, and support necessary to become re-employed.

Eligible workers are identified when a petition is filed with the US Department of Labor, which then investigates and determines whether the layoff meets program eligibility criteria. The petition identifies a specific worker group that may access TAA services.

Trade program services include: employment and case management services; skills assessments; individual employment plans; classroom training, on-the-job training, and apprenticeships; income support; job search cost allowance; and relocation allowance.

The Trade Adjustment Assistance Program is delivered by the Idaho Department of Labor in the American Job Centers and Idaho Department of Labor mobile locations. The program co-location allows for seamless service delivery to individuals already receiving services from programs such as the Dislocated Worker program.

Combined Plan Partner - Unemployment Insurance (Idaho Department of Labor)

The Idaho Department of Labor administers the state's Unemployment Insurance (UI) program, which provides temporary cash assistance to individuals experiencing hardship during periods of involuntary unemployment.

Workers may file and check the status of UI claims through the Idaho Department of Labor's website. Direct in-person staff assistance is available in the state's AJCs. Claimants can also find help through the web portal's "click to chat" feature or directly by telephone.

One-Stop Partner - TANF & SNAP (Idaho Department of Health and Welfare)

Both the Supplemental Nutrition Assistance Program (SNAP) and the Temporary Assistance for Needy Families (TANF) Programs are administered by the Idaho Department of Health and Welfare. Each program is discussed separately below.

Supplemental Nutrition Assistance Program

The Supplemental Nutrition Assistance Program (SNAP), also known as the Food Stamp Program, helps low-income families maintain good health and nutrition. SNAP benefits are federally funded, but the state shares the cost of administering the program with the federal government. Benefits are provided through an Electronic Benefits Transfer (EBT) card, which works like a debit card.

- Be an Idaho resident who is either a U.S. citizen or meets specific lawful residency criteria;
- Provide proof of identity;
- Meet income eligibility limits of 130% of poverty or less for family size;

- Meet resource limits;
- Meet stricter eligibility requirements if applicant is a student, legal immigrant or convicted felon; and
- Participate in a work search program, unless exempt.

For more information visit https://healthandwelfare.idaho.gov:

All eligibility requirements are verified through electronic interfaces or documentation provided by the family. Once approved for SNAP benefits, a family must participate in a semi-annual or annual reevaluation of their household circumstances. In the re-evaluation process, all elements of eligibility are re-verified using these same methods.

SNAP recipients, unless exempt, must either be employed 30 hours per week or participate in job search activities that will help them find or improve employment opportunities to continue receiving benefits. The primary focus of the work program is to help SNAP recipients get a job, keep a job, or find a better job. Failure to participate in this program results in the person losing his or her SNAP benefits.

The amount of SNAP benefits depends on a variety of circumstances, such as the number of people in the household, income, and other factors. Generally, larger household sizes or lower incomes result in higher benefit amounts. In June 2021, the average SNAP allotment per person in Idaho was $136, or approximately $1.51 per meal.

SNAP enrollment is responsive to economic conditions, expanding during recessions and contracting during improved economic times. Recently, during SFY 2021(Idaho's state Fiscal Year mirrors the federal Program Year), Idaho's SNAP caseload decreased, showing a decline in the number of individuals receiving SNAP benefits from 149,800 in June 2020 to 130,700 in June 2021. In 2021, nearly three out of four families eligible for SNAP received benefits the same day they applied. On average, eligible Idaho families receive benefits within three days of applying.

Temporary Assistance for Needy Families

The *Temporary Assistance for Needy Families* (TANF), or as known in Idaho *Temporary Assistance for Families in Idaho* (TAFI) program provides temporary cash assistance and work preparation services for families with children. The program serves an average of almost 1,800 households and 2,500 individuals.

TAFI beneficiaries receive a maximum of $309 per month, regardless of family size. These funds help pay for food, shelter, clothing, and other essentials. Idaho has a lifetime limit of 24 months of TAFI cash assistance for adults.

About 96 percent of households in the program are child-only cases. The remaining 4 percent are single or two-parent households. Child-only cases are usually relatives caring for a child whose parents cannot care for them. In order to receive TAFI benefits, Idahoans must meet the following eligibility requirements:

- Be an Idaho resident who is either a U.S. citizen or meets specific lawful residency criteria;
- Provide proof of identity;
- Meets income eligibility limits for family size;
- Meets personal asset limits;
- Cooperates with Child Support enforcement;

- Participates in a drug and alcohol abuse screening, and comply with a treatment plan if determined to need treatment; and
- Participate in the Enhanced Work Services program and meet strict participation requirements.

Idaho's TAFI cash assistance program requires participation in work and education preparation activities that build or enhance the skills needed to increase participants' income so they become self-sufficient. They are required to participate in 20-40 hours per week (depending on family composition) in approved activities, including, but not limited to: searching for a job, education directly related to employment, work experience opportunities, and treatment for substance use disorders. Failure to meet these required activities results in closure of the TAFI assistance and an additional penalty period during which the family is not eligible to receive TAFI cash. Child-only cases are not subject to work participation requirements.

(B) The Strengths and Weaknesses of Workplace Development Activities

As part of the state planning process, the partners conducted 16 public listening sessions throughout the state in the summer and fall of 2019. The partners reconvened in November 2019 to identify strengths and weaknesses of their programs, as well as for the workforce development system as a whole. Several themes emerged from that discussion. These themes, which are common across all (or most) programs, are discussed below. Several of the specific strengths and weaknesses of individual programs are discussed in more detail in subsequent sections of this plan.

COVID-19 most certainly had a significant impact on Idaho's economy and workforce system; however, we were quick to rebound and achieved pre-pandemic employment levels by October 2020. That said, the challenges and opportunities of shifting to a virtual service delivery model have been incorporated into this section.

Strengths

The primary strengths identified in our activity analysis were program administration, alignment, and partnership. Currently, all the WIOA Title I-B programs, as well as the UI, Trade Adjustment Assistance, and Veterans' Outreach programs are administered by the Idaho Department of Labor. The Carl D. Perkins, postsecondary workforce training, and WIOA Title II (Adult Education) programs are administered by Idaho Career Technical Education (ICTE). Both ICTE and the Idaho Division of Vocational Rehabilitation are under the administrative umbrella of the State Board of Education. Idaho's State Board of Education also offers a unique advantage as one of two states in the nation with K-20 governance under a single board. ICBVI and the Workforce Development Council are under the Office of the Governor.

Having the core WIOA programs—as well as several of the optional partners—clustered within a few agencies makes it easier to streamline planning and policy alignment and promote robust referral processes at the state level. Additionally, the Idaho Department of Labor, Idaho Career Technical Education, and state Vocational Rehabilitation programs enjoy strong, positive, and constructive working relationships, which have contributed and will continue to contribute to the State Planning process.

All of these agencies are represented, by their senior leaders, on the Idaho Workforce Development Council. In addition, partner agencies such as Idaho Health and Welfare, the Idaho Department of Commerce, and the State Board of Education hold seats on the Council.

The successful establishment of data sharing agreements, specifically on wage matching, between Idaho's core partners are due in large part to the strong relationships they have amongst themselves, each playing a significant role as Idaho signed on to the federal State Wage Interchange System to allow for the data sharing to take place. The Workforce Data Quality

Initiative grant awarded to the state will do much to improve this effort as it enhances the state's ability to automate data exchange processes within Idaho's workforce development system. The grant seeks to build upon the existing State Longitudinal Data System (SLDS) to build a secure, web-based interface, which ties together individual program participant information from workforce, education, and unique program data sets from Idaho's WIOA Core Partners, the Idaho State Board of Education, and the Idaho Workforce Development Council. The state was selected in October 2021 to participate in the Data Labs project, hosted by the Beeck Center for Social Impact + Innovation at Georgetown University. Our effort is focused on exploring the feasibility of a common intake process and data system. Through the project we are exploring what has, and what hasn't, worked well in other states that have implemented common intake systems. By June 2022, we expect to make a decision as to whether we will move forward as a system.

In an effort to address the unique regional challenges that the system faces in our state, primarily with service accessibility in rural and remote areas and reductions in federal funds, in the summer of 2019 the Idaho Department of Labor implemented a new mobile service delivery model. Face-to-face service can now be found in more than 47 communities around the state, a more than 100 percent increase from the agency's previous brick and mortar offerings. The new model modernizes how the department delivers services, with a focus on increasing IDOL staff presence across the state while decreasing costs associated with its physical footprint. It is more adaptable to fluctuations in the economy and empowers staff to be more responsive to community needs.

The Idaho Commission for Libraries has been an active facilitator for promoting and expanding the One-Stop system across the state through Idaho's library network. Libraries partner locally with a variety of agencies within the workforce ecosystem to support the educational and employment needs of their communities. The Idaho Department of Labor partners with 17 libraries throughout Idaho as part of their mobile service delivery model. IDOL staff visit these libraries on a set day each month to assist clients with job searches, unemployment claims, labor market information, and community referrals. Additionally, there are nine libraries throughout the state that serve as outreach locations for Title II Adult Education providers. Finally, six libraries across the state serve as meeting locations for Vocational Rehabilitation counselors and clients, with the potential to expand to more locations.

Core and One-Stop partners offer regional training and quarterly collaboration for all One-Stop/AJC staff, ensuring participating staff gain awareness of the services and activities each partner makes available to residents in need across the state. The first statewide partnership meeting will be held on February 22, 2022.

Finally, a strength coming out of the COVID-19 shutdowns is that the partners are better prepared to deliver virtual services which has increased the reach of the system in the most rural parts of the state. The state's Libraries are continuing to invest in building digital access spaces utilizing CARES and ARPA funds – providing even greater access.

Weaknesses/Challenges-

We have identified three major weaknesses/challenges for Idaho's Workforce Development System. The first is in regard to staffing, the second is in regard to serving rural communities, which the state has sought to address by implementing the change in the Idaho Department of Labor's service delivery model (see above) as a means of improving rural access to services, and the third is in regard to connecting programs with employers.

Several of our core and partner programs identified staff turnover, staff training, and staff retention as issues (this has worsened as Idaho's economy continues to grow and improve)—especially those programs which provide direct services like education and counseling. Attracting, training, and retaining high quality, qualified staff can be difficult in a stagnant

funding environment, as well as in a state like Idaho where wages are lower on average. For example, Vocational Rehabilitation Counselors are required to have master's degrees, but the pay is not always commensurate with the education and training requirements. The State's career and technical education programs have also experienced difficulty filling vacancies, as teachers are required to have both pedagogical and technical expertise and may have to take a pay-cut when moving from a career in industry to a career in teaching.

Attracting and retaining quality staff can be especially difficult in rural communities. The pool of local applicants is limited, with many qualified candidates seeking employment elsewhere. The pay is often low, and insufficient to bring in qualified labor from outside the community.

In fact, rural communities present several challenges for our workforce programs. A great deal of research links rural communities with higher instances of poverty and unemployment, lower education levels, and a generally higher need for services. In Idaho, these communities face the additional challenge of isolation, and are often separated by geographical barriers such as mountain ranges or large distances with few transportation options. As a result, bringing services to these communities can cost more, while at the same time serving fewer people. The majority of programs cited rural service provision as a significant challenge. Additional challenges in rural and remote communities for our participants include access to education, affordable housing, and public transportation.

Through the listening sessions introduced in the earlier Strengths section, and fully outlined in Section IV. The State Plan Development Process , it was noted that Idaho's workforce and education system has a difficult time coordinating with employers at both the state and local level. In addition, Idaho's employers could benefit from additional support in connecting with underserved populations such as older workers, Veterans, persons with disabilities, and those exiting the corrections system. With an increased focus on employer engagement, employer satisfaction, and employment outcomes for participants, it is vital that all the WIOA core programs, as well as partner programs, have the opportunity to develop meaningful relationships with employers. Idaho's Workforce Development Council was reorganized in late 2017 to increase the presence of and partnership with employers and industry associations. The reorganization was implemented in direct response to this weakness in Idaho's workforce development system, as identified by an independent, industry-led task force appointed by the Governor in January 2017. Included in the state goals section of this plan are specific steps to increase coordination of business services.

Finally, an unexpected impact of the hiring challenges brought on by the pandemic is that employers are overlooking their previous GED requirements, which has contributed to retention issues with Title II programs. While it eliminates a barrier to employment in the short-term for individuals without high school diplomas or GEDs, Idaho is concerned about the long-term impact individuals may face if they don't have this credential the next time the job market constricts.

(C) State Workforce Development Capacity

The following table provides a summary of the funding and service levels of the programs previously described in Part (A) (where available). The service levels in Table 22 reflect the number of individuals served by each program. It is likely that many Idahoans participate in multiple workforce programs at any one time. However, Idaho is currently unable to produce an unduplicated count of the total unique individuals served across programs in the workforce development system. The figures below provide a sense of the service levels and capacity of individual programs as they exist today.

Funding amounts included in the table are as reported by each program and include both administrative costs and program costs. Federal Funding includes but is not limited to WIOA

authorized funds. The table does not include local funding, employer contributions, user fees, or entitlement payments such as Social Security reimbursements.

Table 22: Workforce Program Capacity - Funding Levels and Participants Served by Program

*Numbers are based on most recent annual–reporting data available for Program Year 2020 (July 1, 2020 through June 30, 2021). Those programs noted by an * show data by federal Fiscal Year 2021 (September 2020 through October 2021).*

Program	Federal Funding	State Funding	Number Served
Title I – Youth	$2,242,411	$0	577
Title I – Adult	$2,130,845	$0	975
Title I – Dislocated Worker	$1,962,590	$0	484
Title II – Adult Education	$2,528,124	$1,069,100	2918
Title III – Wagner-Peyser	$6,050,575	$0	13,227 (jobseekers) 8,926 (employers)
Title IV – Vocational Rehabilitation (IDVR)	$13,488,579	$4,105,644	5,056
Title IV – Idaho Commission for Blind and Visually Impaired (ICBVI)	$2,576,721	$975,516	511
OAA Title V - Senior Community Service Employment Program (SCSEP)	$425,693	$0	59
Trade Adjustment Assistance (TAA)*	$1,888,865	$0	68
Veterans Outreach and Employment*	$843,952	$0	262
Carl D. Perkins	$8,066,593 (includes both Secondary & Post-Secondary programs)	$403,329	6,069 (Secondary programs) 5,328 (Post-secondary programs)
Temporary Assistance for Needy Families (TANF/TAFI) / Supplemental Nutrition Assistance Program (SNAP)	TAFI - $6.3 Million SNAP - $280.7 Million		SNAP –137,202 monthly avg. TANF – 2,547 monthly avg.
Unemployment	$12,536,145	$0	116,350

Program	Federal Funding	State Funding	Number Served
Insurance (UI)*			

B. STATE STRATEGIC VISION AND GOALS

1. Vision

Idaho's Workforce Development System will: improve access to education, economic opportunity, and employment for all of Idaho's job seekers—especially those with significant barriers to employment; develop a skilled and competitive workforce that meets the needs of Idaho's employers; stimulate the vitality of our local communities; and promote a strong state economy.

2. Goals

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

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

In July 2019, the Idaho Workforce Development Council, which serves as Idaho's WIOA State Board, finalized a strategic planning process in which it developed strategies and objectives for the three goals set by the Governor. The Council developed this plan over a six-month time period with significant input from partners, employers, and industry associations.

The three goals mandated by the Governor for the State's workforce system are outlined below. Under each of these goals, the Council identified several strategies that relate more specifically to the populations, services, policies, and priorities within the workforce development system.

Goal 1 – Increase public awareness of and access to career education and training opportunities.

Strategy – Identify, develop, connect, and activate a diverse network of influencers throughout the state that together can promote information and resources in a way that effectively reaches their market/membership/locale.

- Promote awareness of workforce services, education services, and information to the diverse current and potential workforce.

Goal 2 – Improve the effectiveness, quality, and coordination of programs and services designed to maintain a highly skilled workforce.

Strategy – Create, align, and sustain partnerships with stakeholders to implement workforce development programs.

Strategy – Create a baseline to allow for measurement of success in the future.

Strategy – Support development in work-based learning, and innovative programs to drive Idaho's present and future workforce solutions.

Strategy – Leverage existing local employer-focused initiatives to build and support effective pathways to connect Idahoans to careers.

Strategy – Cultivate a high-quality One-Stop Career System that connects employers and workers and facilitates access to workforce services, education services, and information.

Strategy – Champion public policy initiatives that enable dynamic response to evolving industry needs.

Goal 3 – Provide for the most efficient use of federal, state, and local workforce development resources.

Strategy – Be objective, data driven, and accountable.

Strategy – Identify gaps and opportunities in the workforce system and initiate or support policy and/or allocate resources to meet them.

Strategy – Identify opportunities for alignment across projects and resources to enhance results across all stakeholder groups.

The economic and activities analysis conducted in Section (II) of this plan identified the following priority focus areas that are of special concern for the purposes of improving Idaho's workforce system under WIOA. These focus areas, listed below, inform the strategies used to meet the goals listed above. These focus areas will also guide the structure of this State Plan and serve as a continuing theme that unites our goals, strategies, and operational elements.

- **Improving Public Awareness and Access to the Workforce System** – The sixteen public listening sessions conducted by the Council and partners show several gaps that allow various opportunities for system improvement. This includes actionable messaging of the services and benefits available to both jobseekers and employers, including veterans. Also, increasing referrals and service coordination among programs will help to improve outcomes for those in need. Specific goals for implementation during this state plan period include:

1. Identify gaps and opportunities – conduct a customer flow exercise across the partners.
   a. Consider the impact that virtual and hybrid service delivery has made on the system.
2. Develop a consistent referral process across programs.
   a. Participate in the Data Labs technical assistance project.
   b. Explore technology solutions to increase efficiencies in referrals and intake.
3. Implement a communications strategy that is segmented to specific audiences.

- **Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions** – As previously noted, statewide listening sessions brought to light that employers are seeking services and information in a coordinated and targeted fashion. Based on this feedback, the system must clearly identify the services each program has to offer, develop a coordinated approach to visit/serve employers, and utilize a continuous improvement approach to better serve employers. In addition, an information portal needs to be developed to include information on services available from WIOA and non-WIOA partners. Specific goals for implementation during this state plan period include:

1. Develop regional goals.
2. Implement targeted, coordinated business visits through regional teams.

- **Serving Rural and Remote Communities** - In our activity analysis, nearly every core and partner program identified service to rural and remote areas as a significant challenge. Idaho is largely a rural state, so the importance of this priority cannot be understated. Some WIOA partners have modified service delivery strategies to better reach rural and remote Idahoans and the system is interested in evaluating the success of the model and expanding it as appropriate. In addition, the virtual service delivery models implemented during the COVID-19 shutdown provide opportunities to extend our reach. Specific goals for implementation during this state plan period include:

1. Analyze the effectiveness of the distributed service delivery model.
2. Increase access through the use of virtual/hybrid service delivery tools (including an emphasis on mobile device delivery).
3. Implement best practices among the partners.

- **Career Pathways/Sector Partnerships** - Our economic analysis revealed that many of Idaho's in-demand and high-growth occupations are in industries such as *manufacturing, construction, health care, and professional, scientific, and technical services*. The Council, in partnership with the State Board of Education and the state's Chamber of Commerce, is beginning to evaluate skills and certifications that are valued across industries to transform the delivery of workforce training and education. Specific goals for implementation during this state plan period include:

1. Support implementation of the Talent Pipeline Management (TPM) initiative led by the Idaho Association of Commerce & Industry.
2. Define high-quality industry credentials.
3. Revisit career pathways in light of the TPM initiative to ensure system alignment.

Specific high-level strategies, by partner, for addressing each of these areas are discussed in Section (III)(a)(2)(A) and (B) State Strategy Implementation.

(3) Performance Goals

Please refer to Appendix 1 for Idaho'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.*

Sub-regulatory guidance addressing the four-year submission requirements for WIOA Combined State Plans for PY 2020-2023 addresses the ongoing 'phase-in' of negotiated targets for various programs. APPENDICES

(4) Assessment

The State uses the indicators of performance outlined in Section 116 of WIOA to measure and evaluate the effectiveness of individual programs and the State's workforce development system. These indicators are well aligned with the goals indicated above and will allow our programs to measure how well they are serving participants and employers in both the short and long term. Progress toward these indicators will initially be evaluated against the performance targets negotiated by each program with their applicable federal agencies. As the collected baseline data becomes available, the state will have the capacity to measure the progress of the entire workforce development system through combined performance reporting.

Section 116 indicators for measurable skill gains will inform Idaho's workforce providers how well participants are progressing while participating in the workforce development system, as well as their likelihood of success after exit. This information will help the state measure effectiveness against Goal 2 in part II.b.2: *Improve the effectiveness, quality, and coordination of programs and services designed to maintain a highly skilled workforce*. Specifically, indicators regarding measurable skill gains will be used to measure literacy skills improvement as well as technical and workplace skills development. Where applicable, these measures will help programs make real-time adjustments to ensure specific participants are making progress. They will also be used to guide program improvement efforts by providing more general information about how participants' skills progress overall while enrolled in a program. In turn, this data will help the State evaluate the overall effectiveness of the workforce system in developing a highly skilled workforce.

Section 116 indicators regarding employment after exit, enrollment in training or post-secondary programs, and credential obtainment will help the State's workforce development system determine whether individual programs have adequately prepared participants for the demands of the workplace and/or continued education. These indicators will help programs measure the relevance and quality of their services in the context of the larger workforce system, which will help the State measure the system's effectiveness against Goal 3: *Provide for the most efficient use of federal, state, and local workforce development resources.*

Finally, the Section 116 indicator regarding employer satisfaction will help the State measure the relevance and usefulness of our workforce development system to employers. This will help the state measure its effectiveness in meeting one of the state's objectives with an employer focus*: Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions.*

These indicators will be used to measure and evaluate the effectiveness of individual programs, as well as for the workforce development system as a whole. By comparing performance between core programs, we can potentially identify ongoing gaps in service, as well as opportunities. For example, if one core program has consistently high outcomes in a certain area, while other core programs struggle, this may help the State identify areas for improvement while also helping to identify promising practices and strategies from those programs that are performing well. By evaluating individual programs in the context of the overall workforce system, the State will gain valuable information about how and where to improve both programs and the system as a whole. Additionally, as longitudinal performance data emerges for programs across the nation, Idaho's workforce development system can compare performance to states with similar economic and demographic characteristics. These benchmarks will also provide opportunities to identify potential innovative approaches to incorporate in Idaho's workforce system.

The results of these assessments and reports will be used to evaluate the effectiveness of Idaho's workforce development system and guide program improvement efforts. To the extent that identified gaps and areas of improvement result from insufficient alignment between agencies and policies at the state level, such improvement efforts will be undertaken by state staff representing core programs, with guidance by the Council and the WIOA Advisory Group (identified in part II.c.2 of this plan). These efforts will include as appropriate revising existing policies, and issuing clarified guidance to the field about policies, partnerships, and best practices.

Program improvement at the local level will be overseen by the agencies responsible for administering those programs. These efforts will include, as appropriate and authorized by each Title, on-site monitoring and evaluation, targeted technical assistance, professional development, and corrective action plans. The consequences for continued poor performance will be determined by each agency, as authorized under each Title and outlined within the respective State Plans for each program.

When available, the results of such local and statewide improvement efforts will be recorded and reported as part of the State's annual report to the Workforce Development Council.

C. STATE STRATEGY

In Section (II)(b)(2) (State Goals) the Council's new strategic vision and goals are described. Each goal includes strategies specific strategies to strengthen the State's workforce system.

Additionally, the Economic and Activities analyses conducted in Section (II)(a)(1) of this plan also identified four areas of focus that are priorities for the WIOA Combined State Plan:

- Improving public awareness of and access to the workforce system.

- Coordinating business services across partners to ensure delivery of streamlined and high-quality solutions.
- Serving rural and remote communities.
- Refining career pathways/sector partnerships.

With these priorities in mind, Idaho has identified a variety of strategies, which are outlined in the following sections as per the State Plan Information Collection Request.

1. Sector Strategies and Career Pathways

Idaho's current WIOA state plan was developed prior to the COVID-19 Pandemic and contains sector strategies aimed at meeting the needs of individuals facing barriers to employment in an economic climate where unemployment rates had been below 3% for nearly two years. Our economic analysis at that time revealed that much of Idaho's job demand and job growth lay in health care, retail trade, manufacturing, accommodation & food service, construction, and professional, scientific & technical services. While jobs in retail trade and accommodation & food service lean towards lower wages, they play an important role in the development of workplace skills for Idahoans with the highest barriers to employment. Establishing career pathways leading to higher skilled jobs or leveraging entry-level employment in these industries lead to development of workplace skills necessary for continued sector growth. Additionally, jobs in education are increasingly appearing on state and regional "in-demand" occupation lists, signifying the need to invest in strategies that grow the talent needed and develop the workforce of the future.

Sector Strategies

As noted earlier, the Idaho Workforce Development Council, in partnership with the Idaho Association of Commerce & Industry, launched the Talent Pipeline Management Initiative (TPM), and awarded state Workforce Development Training Fund dollars to train an initial cohort of 30 individuals in the methodology. These individuals will then work with local industry cohorts (initial collaboratives include construction, healthcare, natural resources, food processing and welding) and education providers (K-career) to align the talent pipeline through the following steps:

1. Organize Employer Collaboratives
2. Engage in Demand Planning
3. Communicate Competency and Credential Requirements
4. Analyze Talent Flows
5. Build Talent Supply Chains
6. Continuous Improvement

The state's Workforce Development Training Fund has also supported sector strategies by providing state-funded grants to partnerships of industry and education groups to develop or promote training in high-demand occupations. Over the past few years, the Workforce Development Council has shifted its investment strategy by investing nearly $2.5 m during PY20 to emphasize sector grants and direct training to individuals through Idaho Launch, an online career and training research hub, administered by the Idaho Department of Labor, which offers training funds for Idahoans who intend to work in Idaho, covering roughly 75-100% of training costs.

Career Pathways

Through the State's work-based learning initiative, Idaho LEADER (Learn.Do.Earn), all of the core partners, along with the State Board of Education, State Department of Education, Department of Commerce, Department of Health & Welfare, STEM Action Center, Department of Corrections, Department of Juvenile Corrections, and Idaho Public Television are working to increase the line of sight between our youth, transitioning adults, and career opportunities. The group has adopted a work-based learning continuum that categorizes opportunities for employers to engage with education and the workforce system under Learning About Work, Learning Through Work, and Learning At Work. Scaling apprenticeship is a high priority under LEADER, and the investments made through the State Apprenticeship Expansion and American Apprenticeship Initiative grants in *Apprenticeship Idaho* have moved the state forward significantly. In early PY20, USDOL announced a Youth Apprenticeship Readiness Grant (YARG) award to the Idaho Workforce Development Council that has provided resources via a public-private partnership with Idaho Business for Education. With this award, it became imperative to connect IDOL's apprenticeship grants, the WDC's YARG grant and the State Board of Education's Closing the Skills Gap grant through the Idaho Apprenticeship Coalition to ensure that employers and apprentices experience a seamless approach to services.

The LEADER group continues to work on the following priorities in support of career pathways:

•Develop a list of high-quality degree and non-degree credentials. Processes used by Education Strategy Group, Texas CTE and Ohio's TechCred programs are informing our approach. •Launch a more robust Next Steps website to include college and career information for high school students, transitioning adults and influencers (i.e., parents, teachers, counselors, one-stop partners, etc.) •Develop career pathways specific to rural Idaho to be housed in the Next Steps website.

Idaho Career Technical Education (which houses both Adult Education and Carl D. Perkins programs) continues to be the lead in researching and developing career pathways. ICTE oversees 900 secondary career technical education programs in Idaho's high schools, and the 300 CTE programs at technical colleges housed within Idaho's public higher education institutions. ICTE launched an initiative in 2016 to create statewide alignment between secondary and postsecondary CTE programs of study. A statewide articulation is in place for 100 percent of programs that have gone through program alignment. As new programs are created, they will also go through program alignment and this allows secondary students to articulate seamlessly into any Idaho institution that offers their program of study.

To support the statewide articulation framework, ICTE developed Idaho SkillStack - a micro certification/badging platform that communicates the competencies/skills Idaho high school and postsecondary students can demonstrate. The micro certifications/badges are stacked towards the award of postsecondary credit (i.e. once a student earns predefined badges, by demonstrating competency, they are eligible to convert the badges to credit), preparation for industry certifications and the common skills required by Idaho employers for job openings. These badges provide visual progress towards an individual's career goals. Over 50,000 badges have been awarded since the system was implemented.

Taking this effort to the next level, ICTE developed career ladders for the most in-demand jobs in Idaho (where secondary and post-secondary career and technical programs are also available). The career ladders begin with core transferrable skills that students are learning through their program. Students then move from the entry level positions up through the career pathway showing what skills need to be added to move to the next level and where an individual can learn those skills. Currently, career ladders are available for the following:

Skilled and Technical Sciences

- Advanced Manufacturing

- Engineering Drafters and Technicians
- Transportation Equipment Repair
- Installation, Maintenance and Repair

Health care

- Dentistry
- Therapeutic Services
- Nursing
- Pharmacy
- Health Informatics

Business and Marketing

- Administrative Services (showing Finance & Accounting, Human Resources & Administrative Support and Production and Manufacturing)
- Sales and Marketing (showing Marketing and Advertising, Licensed Sales and Retail/Specialty Sales)

Information and Technology

- IT Support and Administration
- IT Design and Development

These career ladders are integrated into the SkillStack and Next Steps Idaho websites to provide an interactive solution for students, parents, teachers, and counselors. The technology platform will allow the State to add additional pathways as they are mapped and to continuously update the data so that the tool stays relevant.

2. Program Alignment and Addressing Gaps

This section addresses strategies in place to ensure alignment between core programs, Combined Plan partners, and One-Stop partners to achieve fully integrated customer services consistent with the State Plan vision and goals. It also describes strategies to strengthen the workforce development system in regard to the gaps identified in analysis in Section (II)(a).

Program Alignment

Many aspects of the WIOA core and partner programs in Idaho are already aligned as a result of being clustered within a few State agencies. For example, all the Title I-B, Trade, Veterans, and Unemployment Insurance programs are administered by the Idaho Department of Labor and thus have a single intake and cross-enrollment process. To ensure ongoing alignment and to guide implementation of the Combined State Plan, the Workforce Development Council coordinates a One-Stop Committee and a WIOA Advisory Group. The One-Stop Committee consists of the senior leadership level of core programs, combined plan partners and additional entities involved in Idaho's workforce development system. The One-Stop Committee is expected to develop policies for consideration by the Council, fulfill certain responsibilities of state and local workforce boards (i.e. AJC Certification), and ensure continuous improvement of the system. The WIOA Advisory Group takes a more hands-on role in drafting policies and plans as its members work more closely with the customers of the workforce system. The WIOA Advisory Group consists of:

- Staff from the Idaho Workforce Development Council.

- Staff from the Idaho Department of Labor to represent the service delivery roles of Title I-B and Title III programs, as well as Combined State Plan programs administered by the Department.
- Staff from the Idaho Department of Labor to represent the administrative entity and fiscal agent.
- Staff from Adult Education to represent Title II programs.
- Staff from the Division of Vocational Rehabilitation to represent Title IV programs.
- Staff from the Idaho Commission for the Blind and Visually Impaired to represent Title IV programs.
- Staff from the Idaho Commission on Aging to represent SCECP, a Combined Plan partner program.
- Program staff from other partner programs as necessary and appropriate.

This group ensures ongoing alignment between programs, coordinates statewide reporting, and will also serve (as appropriate) on the Data System Alignment working group identified in Section (III)(b)(6). The WIOA Advisory Group has been instrumental in supporting efforts to develop co-enrollment and eligible training provider performance data.

Many members of the WIOA Advisory Group also serve on the leadership team for Idaho's Workforce Data Quality Initiative which seeks to build upon the existing State Longitudinal Data System (SLDS), managed by the Idaho Office of the State Board of Education (OSBE), to build a secure, web-based interface, which ties together individual program participant information from workforce, education, and unique program data sets. This interface will enable partners to 1) merge multiple data sets to fulfill WIOA joint performance reporting requirements; 2) link workforce and ETP data to strengthen workforce program data outcomes; and 3) enhance the ability to evaluate both workforce and education programs across the state, including laying the foundation to incorporate additional Idaho-based WIOA partner programs via automated, electronic means.

The Council also identified the following strategies that support program alignment and the goals of the Idaho's Combined State Plan:

- Improving Public Awareness and Access to the Workforce System – The sixteen public listening sessions conducted by the Council and partners show several gaps that allow various opportunities for system improvement. This includes actionable messaging of the services and benefits available to both jobseekers and employers. Also, increasing referrals and service coordination among programs will help to improve outcomes for those in need.
    - *Update*: The One-Stop partners were invited to participate in the Data Labs: Roadmap to Recovery project hosted by Georgetown University and the National Governors Association. The kickoff meeting was held September 23 and 24, 2021. A consistent referral process, increased co-enrollment, and exploration of technology solutions are the focus.
- Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions – As previously noted, statewide listening sessions brought to light that employers are seeking services and information in a coordinated and targeted fashion. Based on this feedback, the system must clearly identify the services each program has to offer, develop a coordinated approach to visit/serve employers, and utilize a continuous improvement approach to better serve employers. In addition, an

information portal needs to be developed to include information on services available from WIOA and non-WIOA partners.

    - *Update*: USDOL provided Idaho with technical assistance in this area through Maher and Maher. Business Services training was held between April and May 2021, and approximately 80 individuals from partner agencies were able to participate. With the transition of the Adult and Dislocated Worker Service programs to Equus Workforce Solutions, the team slowed deployment of the business outreach strategies until the new staff is integrate.

- Serving Rural and Remote Communities - In our activity analysis, nearly every core and partner program identified service to rural and remote areas as a significant challenge. Idaho is largely a rural state, so the importance of this priority cannot be understated. Some WIOA partners have modified service delivery strategies to better reach rural and remote Idahoans and the system is interested in evaluating the success of the model and expanding it as appropriate.

    - *Update*: The impact of the COVID-19 pandemic created significant challenges in the remote service delivery model, requiring nearly all services to be implemented virtually. The partners are now taking stock of what worked well, and didn't work well, with virtual service delivery models and adapting. Remote offices have restarted, and the system is still very interested in evaluating the new model's effectiveness.

    - *Update*: The Idaho Commission for Libraries has been selected by the Governor to work with stakeholders in creating a digital access plan for Idaho, as authorized and funded under Title III of the Infrastructure and Jobs Act of 2021. The focus of this plan will be to address the human elements of digital inclusion and ensure that all Idahoans have the skills, equipment, and support to participate fully in the digital economy. Beginning in the spring of 2022, the ICfL will be conducting stakeholder interviews. This initial assessment will help identify the priority needs of Idahoans to inform a plan that addresses Idaho's unique challenges and opportunities.

- Career Pathways/Sector Partnerships - Our economic analysis revealed that many of Idaho's in-demand and high-growth occupations are in industries such as manufacturing, construction, health care, technology and tourism. The Council, in partnership with the State Board of Education and the state's Chamber of Commerce, is beginning to evaluate skills and certifications that are valued across industries to transform the delivery of workforce training and education.

    - *Update* – The Talent Pipeline Management initiative was also impacted by COVID-19. The in-person training that was scheduled over three, 2-day sessions had to be converted to virtual training and it was tough on the facilitators and participants. While the training was completed by December 2020, it has been a slow start to building the employer collaboratives.

Specific goals for implementation during this State Plan period are included in II(b)(2) and each partner's description of how they will implement the strategies follow in III(a)(2).

Addressing Gaps

In addition to implementing the state's strategies (described above and in II(b)(2)), the needs of specific populations were identified as areas of concern in the Workforce Analysis:

- Older workers
- Youth

- Veterans
- Formerly incarcerated individuals
- Individuals with disabilities

These populations are intertwined with all the strategies, but additional efforts are described below.

- Older Workers - As noted in the economic and workforce analysis, Idaho's population and economy are expected to see continued growth and many of those moving to the state are over 65. The workforce participation rate of this group is just 17.7%, providing an opportunity for employers to leverage these individuals for unfilled jobs. However, employers may need to modify their work environments or address cultural issues to retain older workers. Idaho's workforce system can help by educating employers on the benefits of hiring older workers and the workplace practices that would be desirable to older workers.

- Youth - The economic and workforce analyses revealed that youth ages 16-24 in the workforce are more likely to be unemployed than other age groups. "*Youth ages 16-24 who are in the workforce"* includes all persons, ages 16-24, who are actively employed or seeking employment. This is a broad group which includes, but is not limited to, specific populations with barriers to employment. This group also includes students who are engaged in secondary education (ages 16-21), and youth who are engaged in post-secondary education (through age 24), who are employed or seeking employment. Implementing and scaling a youth apprenticeship initiative in the state will support connecting these youth to careers before they leave high school. The initiative is envisioned to encompass both traditional and non-traditional apprenticeship opportunities. Some could have postsecondary components that lead to industry credentials, others could lead to a bachelors or advanced degree. In addition to the postsecondary credential, the initiative is designed to reduce youth unemployment.

- Veterans – Those who have served our country deserve additional support from the state's workforce system. Efforts are underway to build relationships and opportunities under the Department of Defense's SkillBridge program. In addition, the state's Division of Veteran Services has been a key partner in aligning with the *ApprenticeshipIdaho* initiative to ensure that Veterans can access their benefits when participating in a registered apprenticeship program. There are also initial efforts to attract separating service members to the state for unfilled jobs. Idaho is involved in a pilot with the Department of Defense to receive information from servicemembers who indicate they are relocating to Idaho before they separate. Finally, the State Board of Education has leveraged a Lumina Foundation grant to create a crosswalk between military training and college credit so that there is consistency statewide in how Veterans receive credit for prior learning when enrolling in the state's public postsecondary institutions.

- Formerly Incarcerated Individuals – Given Idaho's low unemployment rate, those individuals with a criminal background also offer an opportunity for unfilled jobs. The Idaho Department of Corrections applied for, and received, a grant from the Lumina Foundation to create better pathways for those who have a criminal background – starting behind the gate in providing postsecondary training programs that are aligned to in-demand occupations. The Workforce Development Council and Idaho Career Technical Education are partners in the grant. In addition, WIOA Title IB Youth funds are allocated to support a position within the Idaho Department of Corrections to meet with youth, 18-24, who are being released to ensure they connect with career planners in the workforce system.

- Persons with Disabilities - Idaho's population of persons with disabilities is increasing at a rate faster than growth in the general populations. Idahoans with disabilities participated in the labor force at a rate of 48 percent, compared to 82 percent for people without disabilities, and the unemployment rate for Idahoans with disabilities was 7.3 percent, on average, compared to 3.1 percent for those without disabilities. Through the delivery of the Idaho Division of Vocational Rehabilitation and Idaho Commission for the Blind and Visually Impaired's Pre-Employment Transition Services (Pre-ETS) for students with disabilities, opportunities have been afforded to students in the areas of counseling on postsecondary education, instruction in self advocacy, job exploration counseling, work-based learning and work readiness. Both Title IV programs are working to expand work-based learning experience opportunities for youth and adults with disabilities who could benefit from this type of training opportunity. Business engagement services delivered throughout the state address the needs of local businesses in the areas of technical assistance. they received training specific to disability-related accommodations for employees on the job, disability etiquette, connecting businesses with an untapped and diverse labor pool, and education on job modification and retention of employees. Agency staff continue to improve their use of regional labor market information and the various career pathways to better inform individuals with disabilities of the emerging high-demand, high growth industry sectors and occupations.

III. OPERATIONAL PLANNING ELEMENTS

A. STATE STRATEGY IMPLEMENTATION

1. STATE BOARD FUNCTIONS

In January 2017, Governor C.L. "Butch" Otter appointed a seventeen-member Workforce Development Task Force to "examine ways to improve Idaho's funding and delivery of training programs to meet our state's growing demand for skilled workers." The Task Force concluded that Idaho needed an entity in the state to better focus and direct workforce development efforts, and empowering a more business-driven Workforce Development Council was the right way to do it. Of the nine recommendations delivered by the Task Force in July 2017, the highest priority was placed on implementing an organizational model that meets the following expectations:

a. Is industry-driven;

b. Can hire/direct dedicated staff;

c. Can effectively coordinate industry-driven workforce development efforts among state agencies and educational institutions; and

d. Is actionable and accountable.

In response to the Task Force recommendations, Governor C.L. "Butch" Otter updated his Executive Order concerning the Council adding industry members, moving the Council under the Executive Office of the Governor and appointing an Executive Director in late 2017. Visit the Council's website to view the full report - https://wdc.idaho.gov/ - under "Task Force Recommendations".

State Board Responsibilities

In Executive Order No. 2019-08, Governor Brad Little reauthorized the Idaho Workforce Development Council as the state board under the Workforce Innovation and Opportunity Act.

As outlined in the executive order, the council is specifically responsible for advising the Governor, Legislature and appropriate executive agencies on matters related to developing and implementing a comprehensive workforce development strategy for Idaho that:

a. Increases public awareness of and access to career education and training opportunities;
b. Improves the effectiveness, quality and coordination of programs and services designed to maintain a highly skilled workforce; and;

c. Helps provide for the most efficient use of federal, state and local workforce development resources.

The Workforce Development Council is also responsible for the development and oversight of procedures, criteria, performance measures and expenditures for the Workforce Development Training Fund, a state-funded mechanism to support workforce education and training.

Implementation of State Board Functions

As described in the introduction to this section, a significant shift in the composition and responsibilities of the Idaho Workforce Development Council was made in late 2017. The Workforce Development Council now meets the membership requirements for the WIOA State Board. In addition to serving as the state board, under a waiver granted by USDOL, the Council also serves as the local board.

The majority of the work carried out by the Workforce Development Council is through a committee structure. Quarterly meetings of the full Council are scheduled a year in advance and committees have standing monthly meetings. Notice of meetings and materials are posted on the Workforce Development Council's website. Council meetings are typically well attended by the public with approximately 40-50 attendees from education and workforce agencies participating in each quarterly meeting.

The Workforce Development Council also empanels ad hoc committees, appointed by the chair when needed. All committees may include members from the general public who have special knowledge and qualifications to be of assistance to the council.

Currently, there are six standing committees, the Executive Committee, the Work-Based Learning Committee, the Workforce Development Policy Committee, the Grant Review Committee, the One-Stop Committee and the Outreach Committee. As defined in the bylaws, the Executive Committee consists of five private sector members and one representative of a labor union, appointed by the Governor. The primary function of the Executive Committee is to ensure that the Governor's directive to develop and implement a comprehensive workforce development strategy for Idaho is carried out. The Executive Committee is also empowered to conduct business in the interim between meetings and may act on behalf of the entire council.

The remaining committees are briefly described below:

<u>Workforce Development Policy Committee</u>

The Workforce Development Policy Committee is responsible for developing most of the policies that govern council actions in carrying out its responsibilities. The committee is specifically responsible for the Workforce Development Training Fund policies and the Eligible Training Provider policies. The committee is also charged with developing an annual projection of needs for state investment into workforce development activities.

<u>One-Stop Committee</u>

The One-Stop Committee ensures that the Workforce Development Council assists the Governor in fulfilling the requirements of the State Workforce Investment Board as set forth in the Workforce Innovation and Opportunity Act - with an emphasis on continuous improvement,

alignment and coordination. The committee develops policies as needed for WIOA and supports the coordination of procurement activities for the one-stop system.

A WIOA Advisory Group, consisting of programmatic leaders of the core and optional partners (referenced in Section II.c.2 Program Alignment, Section III.a.2.A Implementation of State Strategy, Assessment and Section III.b.4 Evaluation of Programs and One-Stop Program Partners), supports the One-Stop Committee on WIOA implementation and assisting the Workforce Development Council to fulfill its responsibilities under WIOA section 101(d) and WIOA section 107 (d).

The WIOA Advisory Group recommends actions to implement the WIOA State Plan and other provisions/requirements of WIOA. These recommendations are presented to the One-Stop Committee, where the executive leaders of the partner agencies can ensure proper resourcing and implementation needs are addressed. The One-Stop Committee then recommends measures for adoption by the full council.

Work-Based Learning Committee

The Work-Based Learning Committee leads the development of replicable and sustainable work-based learning opportunities. The Committee is charged with cultivating a nimble system under the Idaho Leader framework (Learn About Work. Learn Through Work. Learn At Work) to ensure that high-quality programs are available throughout the state. They also help promote the opportunities and benefits of work-based learning to employers, individuals and influencers.

Grant Review Committee

The Workforce Development Council is responsible for approving expenditures (i.e. awards) of the state-funded Workforce Development Training Fund. This was previously the responsibility of the Directors of the Departments of Commerce and Labor in consultation with the Governor's office. To maintain a separation of duties between setting the policy for the Workforce Development Training Fund and awarding grants, a Grant Review Committee reviews applications and make recommendations to the Council. The Grant Review Committee is chaired by a member of the Executive Committee.

Outreach Committee

The Workforce Development Task Force recommendations and subsequent Executive Order from the Governor added "increase public awareness of and access to career education and training opportunities" to the responsibilities of the Council. The Outreach Committee drives the coordination across state agencies, education and the private sector to fulfill this important responsibility.

State Board Decision Making Process

The Council has authority to make decisions regarding its functions as both the state board and the local board under WIOA. Recommendations from committees are placed on the agenda for consideration by the full Council at its quarterly meetings. The Executive Committee, who meets monthly, can take action on items requiring more expeditious review. The Executive Committee is then required to report on its actions at the next full Council meeting.

At the quarterly meetings, the full Council reviews pertinent decision items, including supporting documentation and presentations by staff, as appropriate. The Council will deliberate if necessary, and the recommendation is either approved, or amended in a motion from a council member. A separate council member must second the motion. After being seconded, the full Council votes to approve or reject the recommendation. If the vote is unclear, a roll call vote is taken. When the Council is meeting virtually, or when a member feels the action item has support of the Council, the member can request unanimous consent. The Chair

still requires a second and provides an opportunity for discussion. The Chair then offers members the ability to object and if an objection is made, a roll call vote is taken. If no objections are made, the motion passes. In order for a decision to be binding, a quorum of members must be present at the time the vote takes place. Recommendations which are rejected by the council are returned to the appropriate committee for further work or revision.

2. IMPLEMENTATION OF STATE STRATEGY

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

In addition to the specific activities described in Table 23, the core and partner programs will also participate on the WIOA Advisory Group, and to the extent appropriate, participate in joint training and planning activities coordinated across programs as outlined in Section (II)(c)(2).

Where appropriate, each core and partner program specifically address the various activities they fund which are listed in the table that follows. Activities are organized under the appropriate strategy they address. However, the Idaho Department of Labor is the lead state agency for administering all Title I-B programs, Title III programs, as well as the Combined State Plan partner programs of Trade Adjustment Assistance, Veterans Employment and Training Services, and Unemployment Insurance. As a result, the activities funded by this agency apply across multiple programs and are addressed concurrently. Therefore, this section is organized as follows:

Idaho Department of Labor Programs

As stated previously, the Idaho Department of Labor is the lead state agency for administration of four core programs: WIOA youth, adult and dislocated worker programs and the Wagner-Peyser employment service program. The Department of Labor is also the lead agency for the following Combined State Plan partner programs: Trade Adjustment Assistance, Veterans Employment and Training Services, and Unemployment Insurance. It funds the activities listed in the table below as a means of implementing the State's strategies across its programs.

Title II Programs - Adult Education

The agency responsible for administering Title II programs is the Idaho Career Technical Education (ICTE). ICTE, as well as local Adult Education programs, will invest in the activities listed in the table.

Title IV Programs - Vocational Rehabilitation

Title IV Programs in Idaho are carried out by two agencies: The Idaho Division of Vocational Rehabilitation (referred to below as "The Division") and the Idaho Commission for the Blind and Visually Impaired (referred to below as "The Commission."). This section highlights the efforts of both agencies.

Combined Partner Program - OAA Title V - Senior Community Service Employment Program

The following activities are funded by the Idaho SCSEP to implement the state strategies and support unemployed individuals 55+.

Table 23: Core Program Activities Aligned with Strategy Implementation

Core Program Activities Agency/ Program	*Target key industries/ Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions	*Serving Rural communities	*Career Pathways
Idaho Department of Labor-WP,WIOA Title I-B, TAA, VETS, & UI	·Provide AJC staff training on business outreach techniques. ·Monitor real-time activity, trends & needs at local, regional & state levels. ·Enhanced business services: Outreach; 1 on 1 meetings w/targeted employers; office strategy sessions on how to best respond to employer needs.	·Develop ongoing messaging campaign to make Idaho residents aware of the agency's service delivery model which allows a greater number of customers access to services in more communities. · Encourage Title I-B participants, especially dislocated workers, to participate in work-based learning opportunities, including registered apprenticeships, on-the-job training (OJT), internships and others.	·Coordinates employer outreach among local one-stop partners as One-Stop Operator. ·Work with State Board of Education to ensure WIOA Eligible Training provides offer high quality education experiences. ·Prioritize work-based learning for all programs.	·Maintain a presence in rural communities, through the mobile service delivery model, ensuring that One-Stop services are be available across the state in over 47 communities to serve job seekers and employers in both urban and rural areas. ·Refer to the agency's new service delivery model which now offers service to more than 47 communities across the state, more than doubling previous efforts.	·Implement state's WIOA ETP policy developed to ensure training for occupations within the established career pathways available and prioritized ·Actively work with employers to develop registered apprenticeships for their in-demand occupations.
Idaho Career Technical Education-Adult Education	· Provide technical assistance to WIOA Title II funded program sites to develop/ refine career pathways focused curriculum in key sectors. ·Focus on sector priorities established by the Workforce Development Council aligned with regional labor needs. ·Develop and maintain a regional matrix of labor needs to be shared with WIOA Title II program sites.	· Coordinate WIOA Title II and WIOA Title I intake processes. ·Partner with Workforce Development programs at Community College sites to align adult education with workforce needs.	· Enhance WIOA Title II curriculum to meet employer needs. ·Collaborate with WIOA providers and WDC to communicate the value add of adult education programs to ensure coordinated messaging. ·Coordinate with ICTE Administrator to communicate statewide Adult Education overview to the WDC.	· Fund research, training & implementation of effective distance learning models for adult students, including partner program collaboration to identify promising models or utilize existing resources. ·Encourage local providers to strengthen partnerships & supports in rural areas, funding coordination efforts as appropriate.	· Fund research, training & implementation of contextualized instruction which incorporates workplace preparation & occupational skills into literacy, math and English language instruction, & is aligned with the career pathways being developed by the state.
Vocational Rehabilitation	•Contribute to the sector approach	• Improve program visibility including	•Track business services provided/delivered by	•Collaborate with One-Stop partners, including	•Train staff and expand utilization of the career

Core Program Activities Agency/ Program	*Target key industries/ Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions	*Serving Rural communities	*Career Pathways
Programs- Idaho Division of Vocational Rehabilitation & Idaho Commission of the Blind and Visually Impaired	established by the WDC. •Explore similar tools for pathways common to quality VR outcomes. •Continue to focus on and train staff to use IDOL or other quality sources of local area LMI (e.g. Career Index Plus,) to better inform customers' employment goal selection using a career pathways strategy in concert with regional LMI to identify in-demand quality jobs, including use of DOLs in-demand and quality jobs list, that are a match for the customer. •Increase utilization of Idaho Launch and Next Steps Idaho	improved marketing tools for both employers and people with disabilities with core Programs, including materials for coordinating business services. •Continue to work with one-stop partners to provide guidance on programmatic and physical accessibility to increase quality of services for people with disabilities. •Leverage WDQI and DataLabs projects to increase quality and quantity of appropriate co-enrollment opportunities ·Coordinate activities with One-Stop partners by sharing program contact information, eligibility criteria, and training on program services and mission. Maximize services to individuals with disabilities through increased collaboration and integrated service delivery with various partners in One-Stop centers. Comprehensive information and	staff and reporting this information to WDC on a monthly basis. •Participate in business service teams comprised of membership of all core programs to meet on a quarterly basis.	libraries, to establish information and referral procedures for serving individuals with disabilities in rural communities, where VR lacks a physical presence.	pathways established by ICTE, including the Career Atlas tool. •Look at partnership opportunities for potential shared space in rural and underserved communities.

Core Program Activities Agency/ Program	*Target key industries/ Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions	*Serving Rural communities	*Career Pathways
		training will be provided to outside organizations.			
Idaho Commission on Aging - SCSEP		·Partner with One-Stop partners on outreach campaigns to increase visibility for participants 55+/years old.	·Provide paid employment training, job skills & computer skills training. · Offer supportive services, such as annual physical exams, to overcome barriers to employment	·Continue to support new and existing participants 55+/yrs. old in attaining employment. Offer additional assistance, i.e., On-the-Job Experience (OJE) and other paid training opportunities to those experiencing barriers to employment such as those who live in rural and remote settings across the state.	

B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

The information in this section is organized parallel to Part (A) above and listed in Table 24, which follows on the next page:

- Idaho Department of Labor Programs - includes WIOA Title I-B and Title III, and Combined Partner programs of Trade Adjustment Assistance, Veterans Training & Employment Programs, and Unemployment Insurance
- Title II - Adult Education
- Title IV - Vocational Rehabilitation Programs
- Combined State Plan Partner - OAA Title V - Senior Community Service Employment Programs

Since the state's initial submission of its plan, state partners have sought a variety of ways to establish partnerships with entities outside WIOA to expand programs' reach to areas where they may have a limited presence. The state's library system has served as prime example of this effort. The Idaho Department of Labor, Idaho Division of Vocational Rehabilitation, and Adult Education have all utilized the state's library system to serve as alternative locations where outreach staff can provide services outside American Job Centers or their own program offices.

Informal agreements have also been established with other entities, such as non-profit organizations, cities, and counties across Idaho which have also served to fill this need. Many individuals seeking their specific services have also demonstrated a need for One-Stop services which partners can help meet while visiting these locations.

Table 24: Core Program Activities Aligned with Strategy Implementation

Activities Outside Plan Agency/Program	*Target key industries/Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions	*Serving Rural communities	*Career Pathways
Idaho Department of Labor-WP,WIOA Title I-B, TAA, VETS, UI,	.The sector strategy initiative is supported by the Idaho Department of Labor's Research and Analysis Bureau. This bureau is responsible for developing and publishing data for Bureau of Labor Statistics programs and other labor market information. Industry scans for the targeted sectors are published periodically to update policymakers, industry leaders, and those working in economic and workforce development. These industry scans are important for informing and training all workforce partners about the targeted industries and the high-demand occupations within them.	·The agency's Communications division is assisting in the development of an outreach campaign to inform the public of the Idaho Department of Labor's new service delivery model. In addition, Communications also assists the Workforce Development Council in the development/layout of some of its reports to the Governor and legislature which outline the multitude of workforce activities taking place across the state. ·The agency's Idaho Job Corps initiative is creating better opportunities for Idaho's youth to benefit from the Job Corps program.	·The Research & Analysis Bureau provides labor market information to core and One-Stop partners to assure that employers across the state receive program information and services designed to improve their labor force. ·The Research & Analysis Bureau assists the Workforce Development Council in developing and issuing metrics to determine criteria for awarding Workforce Development Training Fund grants.	·In order to provide One-Stop services across the state, IDOL is leading the discussions with the One-Stop partners to share resources, including co-location. It is rare that partners duplicate each other's work. The communities are so small that each partner is intimately aware of what the other is doing and they most often collaborate; however, there is room for improvement as leases expire and new service delivery models are implemented.	·The career pathways initiative is led by Idaho Career &Technical Education, the administrator of the Carl D. Perkins programs. The initiative is well informed by many of the partners - Adult Education, WIOA Title I-B programs, and Employment Services staff. The effort is overseen by the Workforce Development Council with input from industry leaders and all levels of educators. ·The Idaho Job Corps program is partnering with the community colleges in the state in a new pilot designed to promote more flexibility to the program in aligning to in-demand career pathways. The pilot is in place at one community college and will expand to the others in PY21.
Idaho Career Technical Education-Adult Education		·ICTE also administers the GED program for the State and will ensure that the policies and processes guiding GED testing in	·Training initiatives for local program staff around workforce development, One-	*See Improving Public Awareness/ Access	Career pathways, contextualized literacy instruction, and college transition programs for Adult

Activities Outside Plan Agency/Program	*Target key industries/Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions	*Serving Rural communities	*Career Pathways
		Idaho align with the Combined State Plan strategies. For example, the Division has implemented new polices for opening GED testing centers in underserved and rural communities. ICTE also coordinates training around the GED for local Adult Education providers.	Stops, and program partnerships will be coordinated through the WIOA Advisory Group and Workforce Development Council to maximize cross training opportunities and reduce duplicated efforts		Education will be developed in coordination with ICTE and the State Board of Education, as well as local colleges. This will help ensure alignment with technical programs funded by Carl D. Perkins at both the secondary and post-secondary levels and reduce duplication and redundancies in remedial education programs.
Vocational Rehabilitation Programs- Idaho Division of Vocational Rehabilitation & Idaho Commission of the Blind and Visually Impaired	•Focus training and improvement efforts around Comprehensive Assessments to require the utilization of career pathways model in addition to LMI, when applicable, and enhanced discovery activities to align with interests, abilities, capabilities, strengths, and limitations of the individual.	•VR programs are working to improve program visibility including improved marketing tools for both employers and people with disabilities. •VR programs have re-engineered our 'success stories' process with a focus on the creation of quality products showcasing beneficial outcomes for business and customers who utilize VR. •Title IV programs continue to work with Idaho school districts and LEAs to promote early involvement of students in the VR process and Pre-employment Transition Services.	•Business outreach team for each region has been established by IDVR and ICBVI to strategize and coordinate regional services and to participate in WIOA regional employment teams. •Strategic planning efforts to better inform a business outreach for Title IV programs are now underway,	Continue to encourage and support vendors offering service provision in smaller communities to offset the impact of long distances, while exploring other service delivery models to expand options in rural/remote communities. ·Continue to monitor rural need and continue to support travel by Community Rehabilitation Programs serving Idaho's remote& underserved areas. ·Extend rural outreach to all school districts. Transition coordinator to develop, evaluate &	•Focus training and improvement efforts around Comprehensive Assessments to require the utilization of career pathways model in addition to LMI, when applicable, and enhanced discovery activities to align with interests, abilities, capabilities, strengths, and limitations of the individual.

Activities Outside Plan Agency/Program	*Target key industries/Sector Approach	* Improving Public Awareness and Access to the Workforce System	*Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions	*Serving Rural communities	*Career Pathways
				modify innovative transition services tailored to the needs of local areas/ communities as they align with the combined state strategy and activities of workforce partners. ·Conduct an internal evaluation of structure to better serve participants to include rural and remote communities.	
Idaho Commission on Aging - SCSEP		·Provide referral information to outside organizations that provide information and assistance, such as, Centers for Independent Living and the Area Agencies on Aging.		Continue providing servicing in rural counties as identified by USDOL in the SCSEP equitable distribution (ED) report	

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

The primary purpose of WIOA is to "increase, for individuals in the United States, particularly those individuals with barriers to employment, access to and opportunities for employment, education, training, and support services they need to succeed in the labor market." (WIOA Sec (2)(1)). While Idaho's workforce programs can and do address the need for supportive services, education and training, we must also serve as advocates for the populations we serve, especially with employers.

To that end, in addition to the agency-specific activities outlined below in this section, the Combined State Plan programs, via the One-Stop Committee, acknowledge the need for coordinated outreach to employers regarding the benefits of hiring employees from groups who have barriers to employment. One such option will be to integrate this outreach into the "single point of contact" model discussed in Part (D) of this section.

The remaining information in this section is organized by program, similar to Parts (A) and (B) above, without the table format:

<u>Idaho Department of Labor Programs</u>

As stated previously, the Idaho Department of Labor is the lead state agency for administration of four of the core programs: WIOA youth, adult and dislocated worker programs and the Wagner-Peyser employment service program. The Department of Labor is also the lead agency for the following Combined State Plan partner programs: Trade Adjustment Assistance (TAA), Veterans Employment and Training Services (VETS), and Unemployment Insurance (UI). The department's primary delivery model for these services is via the One-Stop system in American Job Centers.

The One-Stop system is the ideal way to provide customer-centered services to a wide variety of individuals. A robust system of referrals and cross-training provides a seamless experience for customers. Each American Job Center has a resource list of community supportive services as well as personal connections with suppliers of supportive services in their area.

Idaho's web-based Unemployment Insurance program (iUS) uniquely coordinates activities and resources to ensure delivery of necessary services to unemployed individuals. With information, services and resources accessible virtually anywhere, Idaho's One Stop Centers, affiliate sites and all partner locations offer full access. UI program staff, the majority of whom are located at the central Department of Labor office, provide immediate customer service through "click to chat" from the website or by phone. Direct, in-person assistance is also available in the state's comprehensive centers.

Robust cross-training of One-Stop system staff includes training regarding general eligibility guidelines and user training for iUS, which strengthen linkages between the One-Stop system and the UI program and increases awareness of UI issues across core programs.

The long-term unemployed have been an area of special focus at the American Job Centers. The Wagner-Peyser employment service workforce consultants have had great success in engaging those participating in the Reemployment Services and Eligibility Assessments (RESEA) program and other long-term unemployed individuals. Those that need special assistance with skills upgrading are referred to a WIOA career planner. Those with substantial cultural barriers, such as refugees resettled in Idaho, are often One-Stop center customers. The One-Stop centers in Boise and Twin Falls have strong relationships with the Center for Refugees and provide targeted services to those populations.

The WIOA and TAA career planners specifically work with a variety of special populations such as displaced homemakers, low-income individuals, trade-affected workers, veterans, and ex-offenders. WIOA Youth career planners prioritize serving youth with disabilities or those who have aged out of foster care. These customers are served not only by WIOA and TAA career planners but are often co-enrolled in appropriate programs for which they are eligible. They are also referred or provided education, workforce development or supportive services as needed. Career planners work in conjunction with Incarcerated Veterans Transition Program staff to help ensure that homeless and formerly incarcerated veterans enrolled in the program receive the services they need to help spur them towards self-sustaining employment.

In July 2019, the U.S. Department of Labor awarded the Idaho Department of Labor a three-year grant for a State-Operated Job Corps Demonstration Project, transferring operational control of the Centennial Job Corps Civilian Conservation Center (Nampa, Idaho) from the U.S. Forest Service. The project provides flexibility to the state to develop and implement a customized, state-based, approach to serving Idaho Job Corps students. As the first state to take over a Job Corps site, the Idaho Department of Labor is directly responsible for project outreach, recruitment, work-based learning, and employment related services. Known as Idaho JOBCorps, the model is intended to increase access to and enrollment in education and work-based learning for out-of-school and at-risk Idaho youth by leveraging existing resources and programs to better serve Idaho youth in getting the education and training they need in high-demand fields.

Title II - Adult Education

Services to individuals under Title II are carried out locally by eligible providers. The lead agency administering Title II programs (Idaho Career Technical Education) ensures policy alignment with other partner programs at the state level through participation on the WIOA Advisory Group. ICTE will require that local providers coordinate services at the local level and will provide guidance and technical assistance to support such efforts. Local providers are required to demonstrate capacity for and history of (1) local coordination and (2) provision of quality services to individuals, as part of the competitive application process. Effective partnerships are pivotal to maximize resources and align services; the following examples reflect current initiatives to meet this goal:

- Adult Education staff at the College of Eastern Idaho (CEI) and Lewis-Clark State College (LCSC) are collocated at the comprehensive AJC and participate in cross training to refer students to services provided by other WIOA core and one-stop partners.
- College of Western Idaho (CWI) staff participate in Quarterly WIOA Workgroup meetings to share program resources, referrals and updates. The adult education programs partner with the Title I WIOA Youth and Adult programs to leverage resources for maximum benefit to an individual through education, support services, and employment, and training placement.
- CWI Adult Education instructors collaborate with WIOA Youth staff to support Canyon County Juvenile Detention and Idaho JOBCorps youth with their educational goals and connections to training and employment opportunities.

CWI Adult Education instructors collaborate with WIOA Youth staff to support Canyon County Juvenile Detention and Idaho JOBCorps youth with their educational goals and connections to training and employment opportunities.

Title IV - Vocational Rehabilitation

Title IV Programs in Idaho are carried out by two agencies: The Idaho Division of Vocational Rehabilitation (referred to below as "The Division") and the Idaho Commission for the Blind and Visually Impaired (referred to below as "The Commission."). This section addresses each agency separately.

Collectively, Title IV programs are available to provide technical assistance to WIOA program partners, Idaho's employers, and other stakeholders on diverse aspects of disability employment.

Idaho Division of Vocational Rehabilitation

Coordination of service provision takes place at the local area level. Local agreements are established among One-Stop partners that facilitate cross-program communication and include arrangements for cost sharing to maximize utilization and impact. The Division supports informational training on programs. The Division continues to support coordination and co-location with the Idaho Department of Correction.

Additionally, for those that are eligible for the program, IDVR can provide supportive time-limited services, such as transportation for individuals or through vendors to provide services in rural and underserved areas identified and approved by the Division.

IDVR continues to work on the promotion of co-enrollment (where indicated) within the agency and is currently engaged in two technical assistance activities with multiple WIOA plan partners (DataLabs and WDQI) with goals of developing plans and infrastructure to promote proper, appropriate, impactful, and frictionless co-enrollment and referral.

Idaho Commission for the Blind and Visually Impaired

The coordination efforts of the Commission generally reflect those described above for the Division. In addition, the Commission will:

- Work collaboratively with the Idaho Educational Services for the Deaf and Blind (IESDB) to identify students with blindness or visual impairments at an early age for Pre-Employment Transition Services.
- Provide Rehabilitation Technology services and training throughout the state via a state-wide assistive technologist
- Provide alternative skills of blindness training via regional Instructors of the Blind and the Assessment and Training Center (ATC) in Boise.
- Increase training availability, effectiveness and access for clients, including minority, and the underserved in rural communities.

Combined Partner Plan - OAA Title V - Senior Community Service Employment Program

The Idaho Commission on Aging coordinates activities with one stop partners by utilizing local Employment Training Coordinators to connect participants to local one stop programs. The Commission's SCSEP Program Manager provides One-Stop partner information to the SCSEP local regional offices to ensure participation at the local level. Participation with the One-Stop programs is reviewed through annual monitoring reviews. The Employment Training Coordinators assess participants and utilize program and community resources to meet identified supportive service needs.

Quality of service delivery will be measured by participant annual surveys. Annual survey results are assessed and shared with the local SCSEP offices. Strategies are developed and implemented to address survey concerns.

D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

In addition to the agency-specific activities outlined later in this section, the Combined State Plan programs, via the One-Stop Committee, have been working towards a coordinated approach to visit/serve employers, and utilize a continuous improvement approach at the local and regional level. Training for business services staff across the partners was provided in Spring 2021. Regional business development teams are beginning to meet and develop action plans. Such a model will ensure more coordinated, less disruptive or duplicated outreach to employers. It will also build on existing relationships. This approach provides business assistance that streamlines communication and leverages resources to assist with workforce development.

The statewide one-stop operator is charged with coordinating the employer outreach among the local one-stop partner programs. This approach also helps the core programs and agencies coordinate outreach to employers in regard to the benefits of hiring people with barriers to employment. For example, about 15% of refugees living in Idaho are highly educated in their home country but are often overlooked as a source of skilled labor because of their language barriers. Additionally, individuals with disabilities make skilled and loyal employees when matched with a meaningful job that fits their skill sets.

Both individuals and employers benefit when an employee with the right skills is matched in the right job with the right employer, regardless of age, disability status, language, income, race, or other barriers. Idaho's workforce development programs can help employers make the most of these potential employees by providing the services and support to help employers and employees succeed.

The information below describes how individual programs and/or agencies will coordinate services to employers. This section is organized similar to Part (C) above:

Idaho Department of Labor Programs

As stated previously, the Idaho Department of Labor is the lead state agency for administration of four of the core programs: WIOA youth, adult and dislocated worker programs and the Wagner-Peyser employment service program. The Department of Labor is also the lead agency for the following Combined State Plan and One-Stop partner programs: Trade Adjustment Assistance, Veterans Employment and Training Services and Unemployment Insurance. The Department's primary method for coordinating with employers is via the One-Stop system.

Employers are valued and important customers of the One-Stop system. The Workforce Development Council's goals and strategies include a detailed description of the sector strategy approach offered through the American Job Centers as the state's overarching guidance for One-Stop services to businesses.

One-Stop centers serve the business community and are routinely engaged in a variety of local activities. Staff are driven by the philosophy that quality business services ultimately facilitate connections to employment opportunities for job seekers and enhance economic growth. Such services include recruitment and labor exchange support, coordination of customized hiring events, business-related workshops, and providing connectivity to workforce training resources, tax credits, and other business resources available through the organizations such as the Idaho Department of Commerce and Small Business Development Centers.

The Idaho Department of Labor leverages WIOA Title I-B and Wagner-Peyser Employment Services program funds with other federal program funds, discretionary grants, National Dislocated Worker Grants, and state funds from the Workforce Development Training Fund to expand and enhance employer participation in the statewide workforce investment system in a variety of ways:

- Extensive WIOA staff training for business consulting techniques and connecting employers to system resources, particularly WIOA work-based learning opportunities, such as On-the-Job Training, Internships, Work Experiences, and Apprenticeships.
- Development of career pathways as described in Section (II)(c) to guide workforce, economic and education development professionals to meet the needs of employers.
- The use of the state's Workforce Development Training Fund, via Idaho LAUNCH, is administered by the Workforce Development Council and designed to build the skills of workers in new and expanding business.
- Joint partnerships with employers and education for events such as the annual Hard Hats, Hammers & Hot Dogs event in north Idaho or the Youth Career Fair in southeast Idaho.
- With the advent of the COVID-19 pandemic, extensive enhancements to and use of technology including social media and virtual job fairs to connect employers and job seekers.
- Special surveys to identify needs and impressions of employers and inform the department of successful initiatives or areas of needed improvement.
- Development of industry-driven microsites for increasing employment opportunities and workforce development within the sector strategy approach.
- Customized recruitment for employers with high-skill and high-demand occupations
- Specialized workforce studies to identify skills gaps and partnerships.

- Local Veteran's Employer Representatives (LVER) are assigned duties that promote the advantages of hiring veterans to employers, employer associations, and business groups. When employer outreach is primarily accomplished by a "business services team" or like entity within a region or service delivery area, the LVER is included as an active member of that team. The LVER advocates for all veterans served by the AJC with business, industry, and other community-based organizations by participating in appropriate activities.
- Providing a professional setting in One-Stop facilities for employers to conduct customized recruitment and hiring events, collaborative efforts and events conducted with workforce, economic, and community partners.

As noted above, employer services are offered in tandem via the TAA, ES, WIOA Title I-B, and other programs through the state's AJC centers. By aligning activities such as Rapid Response, trade, dislocated worker, sector strategies, career pathways, and more, the state works towards the development, improvement, and expansion of its business engagement activities. These include but are not limited to:

- Providing customized training options as a means of layoff aversion;
- Offering assistance in filing a TAA petition;
- Delivering Rapid Response services to impacted employees to maintain morale and productivity at the worksite prior to an impending layoff; or
- Securing lists of trade-affected workers to ensure they become aware of the services available to them.

Title II Programs - Adult Education

Title II programs are administered by Idaho Career &Technical Education, which employs a Communications Manager. This position coordinates major initiatives with the public and with Idaho employers on behalf of ICTE. The ICTE administrator also sits on the Workforce Development Council, which facilitates major statewide employer outreach initiatives.

The State Director attends Council meetings and collaborates with ICTE and Department of Labor staff to identify and understand the high-level needs of employers across the state. The State Director, in conjunction with ICTE, uses this information, including current economic indicators provided by the Idaho Department of Labor, to prioritize services authorized under Title II. ICTE issues policies and guidance that ensure comprehensive, high-quality services are built into and encouraged of our local service providers, in alignment with core and one-stop partner programs.

The role of local providers is to make connections with individual employers and design quality services in response to the needs of local industries. This may include job-site classes, contextualized vocabulary, connections with occupational training, enhanced transition programs, and other models that help build the foundational skills of students while preparing them for successful employment in the regional economy.

Historically, Title II programs in Idaho have operated on a regional basis and have been administered by the community college, technical college, or university serving each region. Many local programs have established connections with local employers through their institution, as well as convening advisory boards, establishing community partnerships, and connections with other workforce agencies.

Title IV Programs - Vocational Rehabilitation

Title IV Programs in Idaho are carried out by two agencies: The Idaho Division of Vocational Rehabilitation (referred to below as "The Division") and the Idaho Commission for the Blind and Visually Impaired (referred to below as "The Commission."). This section addresses each agency separately.

Idaho Division of Vocational Rehabilitation

The Division's Business Relations Coordinator leads business engagement activities for IDVR with WIOA combined plan partners.

The Division is continuing to develop strategies internally to advance the unified approach for coordinating business engagement activities with outside agencies and partners. IDVR staff completed the Technical Assistance Training for Unified Business Services with the identified Idaho business services partners that was hosted by Idaho Department of Labor (IDOL). Through this training, IDVR staff gained information on the value and importance of coordinated efforts for business services, and information to help with identifying when to partner and how to discuss the supports of the workforce partners with businesses.

Additionally, IDVR is participating in the One-Stop teams across the state with our WIOA partners and assuring a presence within these groups. Furthermore, the Division will be coordinating with the apprenticeship program grant under Idaho Department of Labor which seeks to increase access to and the quality, and quantity of referrals to apprenticeship programs for customers with disabilities. As part of this collaboration, the project will fund an Apprenticeship Coordinator demonstration position housed at IDVR. This position will serve as a liaison between IDVR and IDOL's Apprenticeship Team and will bring expertise on how employers can support individuals with disabilities to be successful in their apprenticeship programs. Furthermore, the Division alongside WIOA plan partners will be moving forward with utilizing a common data HubSpot for business services data. HubSpot helps to assure that the Division can understand the efforts of partners with business, share relevant information, and to collaborate more effectively to meet business needs through the unified services strategy employed across Idaho WIOA plan partners.

Idaho Commission for the Blind and Visually Impaired

The Commission participates in all of the regional One-Stop activities. The Commission also provides on the job assistive technology assessment and training services for employers who have employees participating in the VR program at ICBVI. The Commission also conducts regional trainings about blindness and visual impairments periodically throughout the year that employers can participate in.

In Fall 2021, the Commission entered into an agreement with the VR Technical Assistance Center (VRTAC-QE) for intensive technical assistance with Business Engagement. The Commission is committed to improving and strengthening services to businesses in Idaho. In addition, the Commission works collaboratively with the Idaho Division of Vocational Rehabilitation to ensure a unified Title IV approach to state-wide business engagement activities.

<u>Combined State Plan Partner Program - OAA Title V - Senior Community Service Employment Program</u>

Local SCSEP offices will provide government and non-profit employers with subsidized staff to work at their agency while they receive training. The host agency works with the individual and evaluate if the person can transition to a paid employment position. Employers have access to Employment Training Counselors to develop and implement employment training plans and communicate potential supportive service needs.

Quality of Service Delivery is measured by employer annual surveys. Annual survey results will be assessed by ICOA program staff and shared with the local SCSEP offices. Strategies will be developed and implemented to address survey concerns.

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

Idaho's workforce development system engages the State's six technical colleges (located at Idaho's four Community Colleges, Lewis Clark State College, and Idaho State University) and secondary career and technical programs as partners in the workforce development system to create a job-driven education and training system. At the strategic level, this engagement will be carried out by three main entities: Idaho's Workforce Development Council, Idaho Career Technical Education, and the Office of the State Board of Education. The specific efforts of these three entities are provided in more detail below.

Idaho's STEM Action Center also plays an important role in engaging Idaho's schools with science and technology through teacher professional development, connecting schools and students with grants and scholarships, and hosting educational camps and events.

Idaho Workforce Development Council

Several of Idaho's workforce development strategies—as specified in the State Workforce Development Council's Strategic Plan—are focused on education and training. Their goals include:

- Increase public awareness of and access to career education and training opportunities.
- Improve the effectiveness, quality, and coordination of programs and services designed to maintain a highly skilled workforce.
- Provide for the most efficient use of federal, state, and local workforce development resources.

It is no coincidence that the state's workforce development goals target education and training. As the WIOA State Board, Idaho's Workforce Development Council includes a representative of the State Board of Education, the Administrator of Career Technical Education, a community college representative, two representatives of registered apprenticeship programs, and a representative of a community-based organization for out-of-school youth. These Council members provide a direct connection to job-driven education.

The Workforce Development Council has also directed the creation of Industry Sector Grants, Innovation Grants, and Idaho Launch using state Workforce Development Training Funds. These grants support job-driven training for in-demand occupations by requiring the collaboration of employers and education to meet employer-identified gaps in the workforce. The Industry Sector Grants are awarded to industry partnerships consisting of education providers and at least three employers within the industry providing a cash and/or in-kind match. These grants are used to develop training programs at educational institutions to provide industry with the skilled workforce it needs. The Innovation Grants are awarded to community-based teams representing employers, education and other community partners to provide training for specific in-demand skills in the local area. Idaho Launch began in November 2020 to provide an opportunity for any Idahoan to access short-term workforce training, aligned to employer needs. Launch pays for 75-90 percent of the cost of the training, up to $7,500, based on household income. The only requirement is that the individual plan to work in Idaho after completion of training.

Idaho Career Technical Education

Idaho Career Technical Education (ICTE), which administers both the WIOA Title II and Carl D. Perkins programs, is essential in connecting workforce programs with career and technical

education, engaging the State's technical colleges, and guiding the development of meaningful career pathways. ICTE also coordinates the state Workforce Training Network, which includes the directors of the Workforce Training Centers located at Idaho six technical colleges. The Workforce Training Network leverages best practices and develops statewide solutions to meet the talent needs of Idaho's employers.

ICTE supports the career and technical programs at Idaho's technical colleges through both state and federal funds. For the past four years, ICTE has used in-demand occupations to drive its postsecondary budget request to the State legislature. To guide this request, technical colleges identified programs where all graduates were being placed in in-demand, high-wage occupations and where extensive student waiting lists existed to access these programs. Based on this request, the Governor supported the request to have the Idaho State legislature provide an additional $4.75 million for adult education during FY21.

At the secondary level, ICTE is working to expand an incentive program driven by program quality metrics and alignment to industry needs. Within the efforts to improve program quality is an emphasis on technical advisory committees (TACs). All CTE programs (secondary and postsecondary) are required to have technical advisory committees; however, the effectiveness of these committees varies. ICTE is providing professional development for CTE faculty on creating high-impact TACs and has created a mechanism to allow for state-level review of the activities of local TACs to inform its strategic planning.

Idaho Commission for the Blind and Visually Impaired

The Commission participates in all of the regional One-Stop activities. The Commission also provides on the job assistive technology assessment and training services for employers who have employees participating in the VR program at ICBVI. The Commission also conducts regional trainings about blindness and visual impairments periodically throughout the year that employers can participate in.

In Fall 2021, the Commission entered into an agreement with the VR Technical Assistance Center (VRTAC-QE) for intensive technical assistance with Business Engagement. The Commission is committed to improving and strengthening services to businesses in Idaho. In addition, the Commission works collaboratively with the Idaho Division of Vocational Rehabilitation to ensure a unified Title IV approach to state-wide business engagement activities.

<u>The Idaho Office of the State Board of Education</u>

The Idaho Office of the State Board of Education plays an important role in ensuring that workforce training programs at Idaho's colleges are eligible for Title I-B individual training accounts, and to serve as Eligible Training Providers (ETPs). A group of education stakeholders from the board's jurisdiction representing ICTE, private and proprietary schools, and the Workforce Training Network collaborated to develop WIOA ETP policies and data reporting requirements.

The postsecondary institutions expressed interest in continuing to provide occupational skills training under WIOA but faced challenges in implementing the Act's more stringent performance reporting requirements for ETPs. In particular, the workforce training programs, preferred by employers, did not collect the level of student information required for WIOA reporting. The stakeholder group met for over a year to write policy and develop technical solutions. Most importantly, this group generated buy-in for the much-resisted data collection requirement.

State education staff worked to ensure that all programs within the state's designated career pathways were included on the Eligible Training Provider List. The Office of the State Board of

Education leveraged Statewide Longitudinal Data Systems grant funds to assist the schools in developing data collection systems for WIOA reporting.

The stakeholder group provided input for the final ETP Criteria, which was developed by the Workforce Development Policy Committee of the Council. These criteria, implemented since July 2018, serve to ensure that providers are WIOA compliant to meet the needs of Idaho residents seeking training through Title I-B services.

F. PARTNER ENGAGEMENT WITH OTHER EDUCATION AND TRAINING PROVIDERS

Almost 77 percent of the state's WIOA eligible training provider programs are from Idaho's community colleges and technical education schools. As noted earlier, these programs are well integrated into the workforce development system. The remaining programs listed are offered by state universities or out-of-state providers.

The Workforce Development Council, Idaho Department of Labor and the Office of the State Board of Education work with other providers, such as proprietary schools and non-public training programs, to provide technical assistance as part of implementing WIOA reporting requirements for eligible training providers. These schools have agreed to provide participant and program information for their programs in a manner that is consistent with the public institutions. The result will be a comprehensive, comparable list of program outcomes across all programs in the workforce development system.

The WIOA State Plan partners have a strong relationship with the apprenticeship programs in the state. The union-based apprenticeship programs are available on the WIOA Title IB Eligible Training Provider list and the AFL-CIO's president is represented on the Workforce Development Council. The Workforce Development Council prioritizes a local-area set-aside for Registered Apprenticeship Outreach and the AFL-CIO currently delivers these services. In addition, the state has four U.S. Department of Labor-funded apprenticeship grants under the umbrella of *ApprenticeshipIdaho*, involving employers, unions and many other stakeholders, including traditional and nontraditional training providers, including online training opportunities. Most recently, IDOL was awarded another SAE grant which included funding for the Division of Vocational Rehabilitation and Department of Corrections to hire individuals focused on expanding apprenticeship.

One-Stop partner Idaho Department of Health and Welfare encourages partners to leverage its SNAP 50-50 matching funds for training opportunities, having developed relationships with many community-based organizations that provide training with non-federal funds.

G. LEVERAGING RESOURCES TO INCREASE EDUCATIONAL ACCESS

Idaho's State Plan strategies are well positioned to leverage the state's Workforce Development Training Fund. This fund is supported by 3% of the unemployment insurance taxes collected in Idaho. From this fund, the Workforce Development Council approves industry sector and innovation grants to increase the pipeline for a variety of in-demand occupations. Many of the funds have directly fortified the post-secondary education opportunities in the state. Some examples include, doubling the capacity of the computer science program at Boise State University, providing state of the art medical equipment to Idaho State University, and training incumbent workers with technical skills to receive a license in log scaling and badges in programmable logic control.

Additionally, the state's strategy to develop and align career pathways with our target sectors has encouraged additional support from employers and the private sector in the form of investments in Idaho's post-secondary institutions and technical schools. Through the state's apprenticeship efforts, many sector employers have demonstrated their interest in establishing their own means of training new employees. And the state's strategy to improve rural service delivery has also helped to leverage existing resources and innovations in the private sector,

such as with apprenticeship—especially regarding remote delivery—which our post-secondary institutions can adapt for educational purposes.

Research and implementation of promising delivery models for distance education and remote service delivery has been shared among workforce development partner programs to improve knowledge of, and access to, alternative learning modalities. For example, the Legislature, through Idaho Career Technical Education, continues to invest in CTE Digital through, online career-and-technical education courses to serve rural students who don't have access to live CTE programs.

H. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

The four strategies described in Section (II)(c)(1) and (II)(c)(2) of this plan directly enhance access to post-secondary education and credentials: (1) improve public awareness of and access to the workforce system, (2) coordinate business services across partners to ensure delivery of streamlined and high-quality solutions, (3) serve rural and remote communities, and (4) refine career pathways/sector partnerships.

Items one, two, and four in the above paragraph are closely related, in that a complete and effective career pathway includes multiple entry-points, including Registered Apprenticeship opportunities and certificates, for students of all skill levels, promoting a "no wrong door" approach to education and training. Item four above directs the system to improve access to programs and classes, including those supporting Registered Apprenticeships, in rural communities to reach historically underserved populations there by promoting models such as the "CTE Digital" model mentioned in Part (G) above.

As outlined in Section (II)(c)(1), the State's strategy for implementing well-aligned career pathways relies heavily on efforts already underway at the Idaho Division of Career Technical Education (ICTE). These efforts include articulation between secondary and post-secondary technical programs across the state, including pre-apprenticeship and Registered Apprenticeship training opportunities, as well as the development of SkillStack®, ICTE's micro-certification platform. Information about these projects is reiterated below, for ease of reference:

ICTE oversees approximately 701 secondary career-and-technical education programs in Idaho's high schools, and the technical colleges housed within Idaho's public higher education institutions. A statewide articulation is in place for over 70 percent of programs with a projected completion for all programs in FY21, allowing secondary students to articulate seamlessly into any Idaho institution that offers their program of study.

To support the statewide articulation framework, ICTE developed Idaho SkillStack® - a micro certification/badging platform that communicates the competencies/skills that Idaho high school and postsecondary students demonstrate. The micro certifications/badges are stacked towards the award of postsecondary credit (i.e. once a student earns predefined badges, by demonstrating competency, they are eligible to convert the badges to credit), industry certifications and common skills required by Idaho employers for job openings. These badges provide visual progress towards an individual's career goals.

UI claimants have the opportunity to receive postsecondary credentials while attending WIOA Title I-B or TAA training programs. UI claimants retain eligibility for UI benefits when attending these approved training programs as verified by an AJC career planner.

TANF/SNAP recipients have the opportunity to receive postsecondary training and education to obtain necessary credentials for employment. Once an individual is determined eligible for TANF or SNAP benefits, they referred to the E&T program. The E&T program will then refer eligible individuals to community-based organization, providers, and state and local college partners who offer specialized training and education programs.

IDVR Title IV continues to adapt approaches to increase access to postsecondary credential opportunities including providing up to full support for tuition and books for two-year, four-year, and graduate degree programs. Furthermore, the Division is advancing its approach to postsecondary credentialing through:

- Engagement in the SAEEI Apprenticeship grant project which was awarded in 2021. The SAEEI pilot project will embed a full FTE position within the agency specifically for the purpose of increasing access to apprenticeship programs for Title IV customers working closely with the Idaho Department of Correction and the Idaho Department of Labor. One agency goal for the project is to justify the utility of this position to advocate for sustained funding subsequently improving access to postsecondary credential opportunities.
- A pilot project with Nampa and Challis School Districts and the IDVR Transition Team in conjunction with Title II CTE to improve access and utilization of CTE tools and services (including those leading to postsecondary credentials).

The Idaho Commission for Libraries continues to be a valuable partner toward expanding options for workforce participants, especially in rural communities, across the state. Libraries continue to invest in building digital access spaces to provide even greater access to those residents working to fulfill their education requirements, trying to ensure that all Idahoans have the skills, equipment, and support to participate fully in the digital economy.

I. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES

The Idaho Workforce Development Council includes as members the director of the Department of Commerce and many others who serve on regional economic development boards. In particular, the economic development agency East-Central Idaho Planning and Development Association, also known as The Development Company, is an integral partner with the Workforce Development Council as it officially represents the eastern Idaho local area.

Strategy: Target key industries using a sector strategy

The aforementioned Workforce Development Training Fund has been revamped to connect employers, education, and economic development. Grants are available in four categories:

- Direct grants to employers – these grants help Idaho employers (along with companies starting or expanding in Idaho) to train new and incumbent employees to meet specific economic opportunities and industrial expansion efforts, and may serve as a beneficial layoff aversion tool.
- Industry sector grants - these sector-partnership based grants are designed to increase the talent pipeline for in-demand occupations. A minimum of three employers and an educational or training entity may apply for grant funds for specific occupational training.
- Innovation grants – targeted to rural communities, these grants provide significant flexibility for educational institutions, community-based organizations, economic development organizations, local government entities, and/or employers to increase employment and wages of the community's workforce.
- Outreach projects - provides funding for proposals that provide public information and outreach on career education and workforce training opportunities, including existing education and training programs and services not funded by the Workforce Development Training Fund.

Strategy: Improving Public Awareness and Access to the Workforce System/ Coordinating Business Services across partners to ensure delivery of streamlined and high-quality solutions

As core and One-Stop partner programs work to develop and improve outreach efforts, the Department of Commerce and regional economic development organizations, are engaged in semi-annual workforce summits, hosted by the Workforce Development Council. These summits provide an opportunity to disseminate information and share best practices. The first summit was held in October 2019 and attended by over 50 economic development professionals from throughout the state. The Council provides funding for the travel costs for the most rural individuals to ensure they can attend.

In addition, the Talent Pipeline Management initiative will engage a number of economic development professionals as facilitators. We anticipate training a representative from the Idaho Department of Commerce as a trainer in the TPM methodology so that we can continue to leverage their expertise for the effort.

Strategy: Serving rural communities

Business retention and expansion specialists from the Department of Commerce, along with their network of local economic development professionals, play an important role in educating rural community partners, and businesses, about the workforce system. As mentioned in the previous paragraph, special attention is paid to engaging the economic development professionals in the workforce summits by paying for their travel costs.

B. STATE OPERATING SYSTEMS AND POLICIES

This section of the State Plan includes a description of the State operating systems and policies that will support the implementation of the State strategy described in **Section II Strategic Elements**.

1. THE STATE OPERATING SYSTEMS THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES. THIS MUST INCLUDE A DESCRIPTION OF–

WIOA emphasizes the importance of labor market and system performance information in driving strategic and operational decision-making within a state's workforce development system. Idaho subscribes to this approach as it confirms data plays a key role in its strategic development and oversight processes.

System of Communication

To ensure ongoing alignment of WIOA programs and the state's workforce development system, and to guide implementation of the Combined State Plan strategies and goals, Idaho's Workforce Development Council utilizes numerous subcommittees and working groups, meeting regularly with a variety of groups to discuss state plan goals and priorities. Several of these groups, such as its standing One-Stop Committee and the WIOA Advisory Group, report to the WDC to assist in advancing the goals of the WDC. A brief description of each group follows:

- The One-Stop Committee consists of the senior leadership level of core programs, combined plan partners and other stakeholders in Idaho's workforce development system. The Committee, which develops policies for consideration by the WDC, communicates guidance and expectations on policy development and state strategies to Idaho's American Job Centers and WIOA program staff across the state as well as engaging in discourse with the WDC on goal progress and decisions within their charter.
- The WIOA Advisory Group is a hybrid working group with representation from all WIOA core programs, WDC staff, other combined plan partner programs, and stakeholders. This group consists of principal contributors towards the development of Idaho's

Combined State Plan and works to identify and align policy and planning with the WDC's goals, all while meeting the regulatory requirements of WIOA. Additionally, Advisory group members help to promote the alignment of these programs with the overall goals and strategies found in the Common Elements portion of Idaho's WIOA Combined State Plan, communicating decisions and strategies with program leadership.

The WDC's Executive Director serves as a member of these groups, acting as a primary liaison between the WDC and the working groups. Members of both the WIOA Advisory Group and the One-Stop Committee participated in a state plan strategic planning session and also participated in multiple public listening sessions held across the state.

Data Systems

Idaho maintains a federated statewide longitudinal data system (SLDS) with several participating state agencies housing primarily educational data and incorporating a limited scope of workforce data by way of participant wage matching. These systems are currently designed to assist agencies in meeting their individual state and federal reporting requirements for program participants and allow analysis of individual wage outcomes. Idaho's federated model was adopted to align with the state's data sharing culture and to address issues such as a state prohibition on permanently establishing a linkage between certain data. Under Idaho's federated SLDS, each agency retains control of the personal information in its records and safeguards the data according to its own needs and requirements.

Through its Workforce Data Quality Initiative (WDQI) grant, the state has engaged its core WIOA programs to coalesce data sets for the purposes of program evaluations, outcomes reporting, and predictive analysis. Building upon the existing State Longitudinal Data System (SLDS), WDQI allows for data exchange between disparate MISs while maintaining appropriate data security and compliance requirements. Core program partners have come together to establish a shared data validation policy which incorporates procedures unique to each agency's program design. The project works on two fronts –interagency policy development and technical development – to assist Idaho's core partners under WIOA in the exchange of data via a web-based portal for multiple federal reporting purposes. With core partners working together, Idaho leverages resources towards improved federal reporting, timely communication of achievements and enhanced performance outcomes.

IDOL's IdahoWorks houses multiple workforce programs' longitudinal datasets, including case management data for multiple programs (WIOA Titles I, III [Wagner-Peyser, Employment Services (ES)], and Trade Adjustment Assistance (TAA)), and employment and wage records (inclusive of Unemployment Insurance (UI) wage and benefits data). IdahoWorks is a web-based, all-in-one labor exchange, reporting and case management solution; a data warehouse and multi-program management information system that collects program participants' data.

The Office of the State Board of Education (OSBE) houses all K-20 data in the SLDS, with case management systems maintained at the WIOA agency level, for example, the Idaho Division of Vocational Rehabilitation (IDVR) utilizes one proprietary system (AWARE) and its sister agency, the Idaho Commission for the Blind and Visually Impaired (ICBVI) utilizes their own customized case management system (ORION). Through the SLDS, OSBE serves as a larger data conduit for public K-20 education (from kindergarten through post-graduate), Idaho Career Technical Education (ICTE), and IDVR.

Idaho's segmented approach to data sharing allows each agency to retain control over the sensitive personal information in its records and safeguard data according to its own needs and requirements. Idaho WIOA partners maintain separate data systems because each partner has invested significant funds, time, training, and other resources into each of their existing programmatic management information systems, built to meet agency/program designs consistent with WIOA reporting elements The state's approach with the WDQI project

incorporates these concerns, working within the federated system rather than against it, ensuring a better fit for Idaho.

This effort will do much to improve the state's ability to automate data exchange processes within Idaho's workforce development system. Additionally, this data will feed into IDOL's Labor Market Information (LMI) tool known as JobScape. JobScape is an easy-to-use, mobile-friendly career and educational training search tool that provides occupation descriptions, wages, worker demand, current employment, and the number of certificates and degrees awarded from Idaho's public postsecondary for-credit programs. Users, Idaho students, and job seekers, can search by keywords, occupation/job titles, military occupation titles or codes, or commonly used job title acronyms. JobScape enhancements would include non-credit program and aggregate ETP participant rates of wages, employment, graduation/program completion, and credential attainment. With this easily accessible data, customers can make more informed career and educational training decisions.

Currently, the core programs under WIOA use several different Management Information Systems (MISs) to collect and report data for program management, case management, and federal reporting purposes, eventually feeding into its WDQI project. These systems, and the applicable agencies and programs that use them, are:

MIS	Agency (WIOA Title)	Function
Aware – Alliance Enterprise Incorporated	Idaho Division of Vocational Rehabilitation (Title IV)	Primary case and information management system
ORION	Idaho Commission for the Blind and Visually Impaired (Title IV)	Primary case and information management system
LACES (Literacy, Adult, and Community Education System)	Adult Education, via Idaho Division of Career-Technical Education (Title II)	Information management system
IdahoWorks – America's Job Link Alliance *iUS* - Internet Unemployment System	Idaho Department of Labor (Title I-B, Title III & Unemployment Insurance-Combined Plan Partner)	Primary case and information management system for Titles I-B & III; MIS for Veterans' and TAA programs. Labor exchange system for job seekers and employers. Used by unemployment insurance claimants to determine eligibility and file claims, and by staff to process and track claims.
SPARQ & Web Data Collection System (WDCS)	Idaho Senior Community Service Employment Program – Combined Plan Partner	Primary case and information management system

As specified in Section (III)(b)(6) of this State Combined Plan, Idaho will continue to use these existing systems as the core infrastructure for our data collection and reporting processes under WIOA. Please refer to that section for more information regarding our plans for linking and integrating these systems.

This portion of the State Combined Plan primarily addresses the data collection and reporting processes for core WIOA programs as well as the optional programs currently administered by the Idaho Department of Labor (Jobs for Veterans, Trade Adjustment Assistance, and UI). These

constitute the core framework for Idaho's current workforce development system and American Job Centers.

The state has continued to develop its comprehensive One-Stop system under WIOA, gaining a better understanding of how partners most effectively intersect with the One-Stop system. Part of updating our One-Stop system involved targeted research of partner programs to better understand their data collection processes and needs as they relate to the state's One-Stop system and the Workforce Development System. This will allow for the identification of common data elements and opportunities for streamlining.

The data collection and reporting processes for the core WIOA programs are addressed across four main topics as listed below:

- The physical process of collecting information from participants
- An overview of the information being collected
- An overview of who uses the system and for what purposes
- Reporting processes

Each topic comprises applicable overviews of each of the core programs.

Physical Data Collection Processes

Below is a brief overview for each program describing the physical process of collecting information from participants and entering it into each data system. The specific data systems used for each program are discussed in previously in Section (III)(b)(1)(A).

Programs Administered by Idaho Department of Labor: These programs use *IdahoWorks* as the initial portal through which participants register for and enroll in programs and services. In most cases, information is populated into the system by participants who fill out an online application. However, department staff also have the option to manually input data into the system.

- **Title I-B Programs (Adult, Youth, Dislocated Worker)** - Job seekers initially enter their information into the *IdahoWorks* system by completing a web-based registration. For enrollment into a WIOA program, a career planner, whether an Idaho Department of Labor youth career planner or an Equus Workforce Solutions Adult and Dislocated Worker career planner, will locate the existing registration, verify the information, and collect any additional required documentation as needed.
- **Title III (Wagner-Peyser)** - Job seekers initially enter their information into the *IdahoWorks* system by completing a web-based registration. After they have created an account, users have access to job listings and job search functions within *IdahoWorks*. Employers may also create accounts to post jobs and review resumes.
- **Jobs for Veterans, Trade Adjustment Assistance-** (One-Stop Partners) -Participants in these programs also use the *IdahoWorks* system as their portal for online registration and enrollment.
- **Unemployment Insurance -** (One-Stop Partner) - UI claimants file claims use using iUS, an online portal where they provide information to determine their eligibility. Assistance is also available over the telephone to collect information from those unable to use the online portal. Career planners who provide RESEA re-employment services collect the participant's interview information into an Excel template, which is sent immediately to UI staff for processing.

Adult Education: Students initially attend a general orientation session (either in person or online), followed by an assessment which measures their Educational Functioning Level. Once the student has completed the assessment, a staff person or teacher will conduct an in-person intake interview. This information is then manually entered into the statewide Adult Education MIS (LACES).

Vocational Rehabilitation Programs - Programs under Title IV of WIOA are administered by both the Idaho Division of Vocational Rehabilitation (IDVR), as well as the Idaho Commission for the Blind and Visually Impaired (ICBVI). The intake process for both agencies is similar. The intake process typically begins with a referral, in which the applicant may be asked to fill out an application form. The applicant then meets for a face-to-face, or virtual interview with a counselor. The individual may also need to complete additional assessments to determine eligibility (such as medical evaluations). Data collected during the application process is entered into each agency's respective MIS (Aware for IDVR and Orion for ICBVI). Supporting documentation is also collected during this time and may be scanned into the system or filed as appropriate.

Senior Community Service Employment Program - SCSEP uses a comprehensive system called SPARQ for standard data entry and reporting of quality data about participants and services. Employment training specialists from Easterseals-Goodwill input participant information through the SPARQ system and Web Data Collection System (WDCS). Information regarding host agencies, assignments, and employers can also be accessed and edited.

Information Collected

The information collected by the core WIOA programs during intake has many common elements, as well as elements which are unique to each program. Common elements include demographics (race, age), identifying information (name, date of birth, SSN), employment status, educational attainment, disability status (self-reported and/or verified), and referral information. Unique elements are generally used to determine eligibility for each program and to guide participant placement. These include:

- **Title I-B, III, and other IDOL Administered programs** - Eligibility to work, desired occupation, migrant seasonal farmworker information, veteran's information, UI claimant status, selection for RESEA
- **Adult Education (Title II)**- Educational Functioning Level, detailed educational background, educational goals
- **Vocational Rehabilitation (Title IV)** - Disability type and medical background/records (where applicable)
- **Senior Community Service Employment Program** - Grantee information, participation levels, community service assignments, participant characteristics, and core performance measures. Management reports contain specific information on applicants (pending, eligible, and/or ineligible), participants, host agencies, employers, and follow ups/actions.

Uses and Users of Data Management Systems

The data systems used by Idaho's core WIOA programs are generally used by staff across all levels of each program from field staff, to local program managers, to state administrators.

Additionally, portions of the *IdahoWorks* system used by the Idaho Department of Labor can also be accessed by job seekers and employers.

The information collected by the various programs is used for a number of purposes such as determining eligibility, program placement, measuring participant progress, evaluating program effectiveness, case management, aiding in program planning, and federal reporting.

Reporting Processes

Reporting processes for core WIOA programs are dictated by Section 116, as well as individual titles and federal guidance. Please refer to Section (III)(b)(6)(A)(ii) of this Combined State Plan.

Additionally, core WIOA program partners are working together as part of a Workforce Data Quality Initiative (WDQI) award to develop web-based, secure data exchange tools as well as a combined, repository for joint performance analysis and reporting of WIOA outcomes. Please refer to Section (III)(b)(6)(A) of this Combined State Plan for more detailed descriptions of shared reporting goals for core WIOA programs.

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

General Policy Process

Most policies that support the implementation of the State's strategies in the Combined State Plan are currently determined at the agency or provider level based on the statutory requirements for each Title (for example, program intake and assessment policies). Although the statute changed several years ago, the state agencies responsible for the various programs continue to review their existing policies to ensure compliance with WIOA, ensure alignment with the strategies identified in this Combined Plan, and identify potential logistical complications across programs. State agencies are expected to communicate these policies to local programs, provide applicable training so that program staff have a full understanding of the most current policies, and establish methods to monitor local compliance. It is important that any such policies should be developed with full input from local providers, as applicable, to ensure that policies are reasonable, necessary, and provide adequate flexibility for local and regional implementation.

Idaho has several co-enrollment policies in place, primarily for programs housed with the Idaho Department of Labor (Title I-B, Title III, TAA, VETS). For example, the Department requires co-enrollment of Trade Adjustment Assistance recipients with WIOA Title I-B Dislocated Worker whenever they are eligible to receive assistance or services from WIOA staff. The Department utilizes a single management information system (MIS) for both fiscal and case management for WIOA Title I-B and III programs, as well as Trade and VETS programs. Unemployment Insurance has a policy that job-seeking UI claimants must enroll in the Wagner-Peyser labor exchange. IDVR and ICBVI address Title IV co-enrollment through an MOU, but this understanding is currently only between the two programs. Development of additional co-enrollment policy or procedure will take place across all core programs as a function of the DataLabs co-enrollment initiative, currently underway.

Guidelines for the one-stop system in Idaho are developed by the One-Stop Committee of the Workforce Development Council, comprised of decision-makers for the state administrative entities for the core partners and one-stop partners. This committee provides active oversight for the state's One-Stop delivery system and makes policy recommendation to the Workforce Development Council, utilizing WIOA as a foundation for policy development in combination with specific program regulations to ensure partners have a thorough understanding of any

potential impacts. The committee developed the following policies, approved by the Council, to facilitate WIOA implementation across the state.

- Executed a statewide one-stop MOU (link) that outlines the expected policies and standards for service delivery
- Provided additional one-stop infrastructure funding guidelines (link)
- Recommended criteria for one-stop certification and assessments (link)
- Developed a policy for selecting service providers under WIOA Title I-B (link), including the One-Stop Operator
- Implementing the state's one-stop branding requirement (link)
- Developed a policy for the state's Eligible Training Provider list (link)

Through the statewide one-stop MOU, the Workforce Development Council provides the following guidance for state-administered one-stop partner programs' contributions to a one-stop delivery system:

Cost sharing for the Idaho American Job Center Network will be negotiated at the service delivery area level. Partners at comprehensive AJC (and affiliate AJCs as appropriate) agree to enter into a cost sharing agreement on an annual basis to support the cost of shared services and jointly occupied facilities. All parties to this MOU recognize infrastructure costs are applicable to all required one-stop partners, whether they are physically located in the AJC or not. Each partner's contributions to these costs, however, may vary, as these contributions are based on the proportionate use and relative benefit received, consistent with the Partner programs' authorizing laws and regulations and the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CFR Part 200, state rules and policy guidelines and any local program policies regarding cost sharing.

3. STATE PROGRAM AND STATE BOARD OVERVIEW

A. STATE AGENCY ORGANIZATION

In Idaho, many of the WIOA core and Combined Plan programs are consolidated into a few core agencies. Below is a list of the agencies and the applicable programs which they oversee:

- ***Idaho Department of Labor***
    - WIOA Title I-B - Youth, Adult, Dislocated Workers
    - WIOA Title III - Wagner-Peyser Employment Services
    - Combined Partner - Trade Adjustment Assistance
    - Combined Partner - Veterans Outreach and Employment
    - Combined Partner - Unemployment Insurance
- ***Idaho Division of Career & Technical Education***
    - WIOA Title II - Adult Education
    - One-Stop Partner - Carl D. Perkins
    - Other - Workforce Training programs
- ***Idaho Division of Vocational Rehabilitation***
    - WIOA Title IV - Vocational Rehabilitation (except for the blind)

- ***Idaho Commission for the Blind and Visually Impaired***
    - WIOA Title IV - Vocational Rehabilitation for the Blind and Visually Impaired
- ***Idaho Commission on Aging***
    - Combined Partner - OAA Title V - Senior Community Service Employment Program

The agencies listed above report to a number of entities, including their federal funding stakeholders, the governor, and commissions or boards as appropriate.

Program services for the WIOA Core and Combined partner programs are provided locally through a variety of delivery systems. These systems are described in detail for each program under Section (II)(a)(2) State Workforce Development Activities. A high-level summary of these delivery systems is included below:

Title I-B, III, Trade, Veterans, and UI: The majority of WIOA Title I-B and other Idaho Department of Labor's services are provided through the American Job Centers. Although Unemployment Insurance is centralized at the State office via an online application system, in-person staff assistance is available in the state's comprehensive One-Stop offices, while online staff assistance is available throughout the state. The Department of Labor also uses the *IdahoWorks* system to provide online services such as job-search and streamlined applications.

Title II - Adult Education: Title II programs are carried out locally through Idaho's Technical College system as well as the Idaho Department of Corrections. Colleges and the Department of Corrections provide classes and other instructional services on their main campuses as well as more than 40 outreach sites throughout the state.

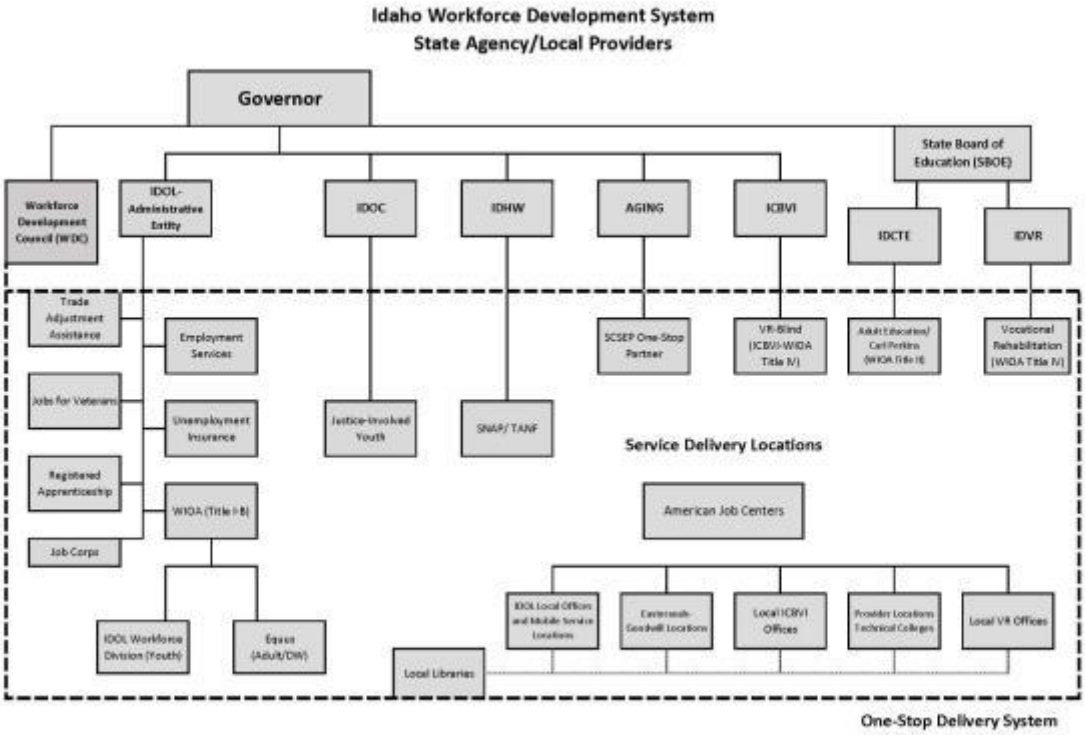
Title IV - Vocational Rehabilitation: Counseling services and programs are carried out locally by the Idaho Division of Vocational Rehabilitation (IDVR) and the Idaho Commission for the Blind and Visually Impaired (ICBVI). The IDVR provides services through eight regional offices and a series of sub-offices. Through cooperative agreements, IDVR has staff collocated with the Idaho Department of Correction. The Commission provides services through a central office in Boise, ID and five regional offices.

OAA Title V - Senior Community Service Employment Program: Counselors are available via the Commission on Aging's local offices. Seniors are also placed at non-profit host agencies throughout the state to obtain job training.

An organizational chart of Idaho's Workforce Development System as a whole follows.

Figure 4: Org Chart for Idaho Workforce Development System - All programs

IDAHO WORKFORCE DEVELOPMENT SYSTEM - STATE AGENCY ORGANIZATION



B. STATE BOARD

This section describes the State Board Membership Roster and State Board.

I. MEMBERSHIP ROSTER

Idaho's Workforce Development Council serves as the State Workforce Board under section 101(a). The Council's membership brings together a well-integrated mix of business and industry, education, labor, community and government representatives to establish the vision and plan for Idaho's workforce development system.

Executive Order No 2019-08 provides for council membership as follows:

- 17 positions appointed by the Governor representing industry and nominated by statewide and regional business organizations;
- Seven positions appointed by the Governor representing the workforce, including two labor union representatives, two registered apprenticeship program representatives, one representative of a community-based organization for veterans, one representative of a community-based organization for individuals with disabilities, and one representative of a community-based organization for out-of-school youth;
- Ten positions appointed by the Governor representing government, including representatives from the Department of Labor, State Board of Education, State Department of Education, Division of Career-Technical Education, Division of Vocational Rehabilitation, Department of Health and Welfare, Department of Commerce, an elected city official, an elected county official, and a community college representative.

- One member from each chamber of the Idaho Legislature, including a member of the Senate appointed by the Senate President Pro Tem, and a member of the House of Representatives appointed by the House Speaker;
- The Governor or his designee.

Further, the order requires that the chair, vice chair and executive committee be from the private sector, with the exception of one position representing a labor union.

The Council's membership brings together a well-integrated mix of business and industry, education, labor, community and government representatives to establish the vision and plan for Idaho's workforce development system. A roster of the Workforce Development Council membership and their affiliations is listed below. This roster may also be found on the Council's Website at: https://wdc.idaho.gov/council-members/.

IDAHO WORKFORCE DEVELOPMENT COUNCIL MEMBERSHIP

Representing the Governor

Russell	Barron	ID Division of Occupational and Professional Licenses	Emmett	Region 3	Governor's Rep

Representing the State Legislature

Michelle	Stennet	Idaho State Legislature - Senate	Ketchum	Region 4	Legislature
Scott	Syme	Idaho State Legislature - House	Caldwell	Region 3	Legislature

Members appointed by the Governor, representing Business

Deni	Hoehne	WinCo Foods	Eagle	Region 3	Industry
John	Young	Young Construction	Coeur d'Alene	Region 1	Industry
Brian	Cox	Kochava	Sandpoint	Region 1	Industry
Ben	Davidson	Idaho Central Credit Union	Chubbuck	Region 5	Industry
Jeff	Greene	Saint Alphonsus	Boise	Region	Industry
Sarah	Griffin	Idaho Power	Boise	Region 3	Industry
Dave	Hannah	G-Zero	Meridian	Region 3	Industry
Kelly	Kolb	Vista Outdoor	Lewiston	Region 2	Industry
Steven	Laing	Lamb Weston	American Falls	Region 5	Industry
Kate	Lenz	Kount	Boise	Region 3	Industry
Liza	Leonard	Ball Ventures	Idaho Falls	Region 6	Industry

Deni	Hoehne	WinCo Foods	Eagle	Region 3	Industry
Hope	Morrow	Idaho National Lab	Boise	Region 3	Industry
James	Pegram	Simplot	Boise	Region 3	Industry
Matt	Van Vleet	Clearwater Paper	Lewiston	Region 2	Industry
3 Vacancies		*Private Sector/Business Representatives*			Industry

Members appointed by the Governor, representing Workforce

Anna	Almerico	Idaho Out-of-School Network	Boise	Region 3	Workforce serving out-of-school youth
Donna	Butler	Dawn Enterprises	Blackfoot	Region 5	Workforce serving individuals w/ disabilities
Oscar	Evans	Veterans Representative	Homedale	Region 3	Workforce serving Veterans
Ed	Huskey	United Electric	Boise	Region 3	Workforce - labor organization
Joe	Maloney	Idaho State AFL-CIO	Boise	Region 3	Workforce - labor organization
Tom	Schultz	Idaho Forest Group	Boise	Region 3	Workforce - registered apprenticeships
James	Smith	Eastern Idaho Electrical JATC	Iona	Region 6	Workforce - labor organization/ registered apprenticeship program

Representatives of Government

Linda	Clark	ID State Board of Education	Boise	Region 3	Government - higher education
Jane	Donnellan	ID Division of Vocational Rehabilitation	Boise	Region 3	Government - WIOA Title IV
Tom	Kealey	ID Department of Commerce	Boise	Region 3	Government - economic development
Clay	Long	ID Career Technical Education	Boise	Region 3	Government - WIOA Title II
Jani	Revier	ID Department of Labor	Boise	Region 3	Government - WIOA Titles I and

Linda	Clark	ID State Board of Education	Boise	Region 3	Government - higher education
					III
Lori	Barber	College of Eastern Idaho	Idaho Falls	Region 6	Government - community colleges
Sherry	Maupin	Commissioner - Valley County	McCall	Region 3	Government - elected County official
Marilyn	Whitney	State Department of Education	Boise	Region 3	Government - K-12 education
Sean	Coletti	Mayor - City of Ammon	Ammon	Region 6	Government - elected City official
Jennifer	Palagi	Idaho Department of Health and Welfare	Boise	Region 3	Government - TANF & SNAP

The WDC members affiliated with the core programs are:

- WIOA Title I-B & Title III (Wagner-Peyser) – Jani Revier, Director of Idaho Department of Labor
- WIOA Title II (Adult Education) – Clay Long, Administrator, Idaho Career & Technical Education,
- WIOA Title IV (Vocational Rehabilitation) - Jane Donnellan, Administrator, Idaho Division of Vocational Rehabilitation

II. BOARD ACTIVITIES

The WIOA Advisory Group supports the Workforce Development Council and its One-Stop Committee by bringing forth issues, sharing vital information about policy changes and making recommendations to the council.

The council receives, via quarterly meetings, regular updates about the activities taking place in the workforce development system around the state. When setting the agenda for Council meetings, the executive committee makes a concerted effort to include all workforce development activities, including those not funded under WIOA. This ensures that efforts with the state's limited resources are not duplicated and work in tandem to further the state's goals.

Committees, described in Section III(a)(1), work to ensure that all of the board's functions are met. The committee members attend to functional details, provide recommendations, and ensure action taken by the full council is well informed.

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

A. ASSESSMENT OF CORE PROGRAMS

The State will use the indicators of performance outlined in Section 116 of WIOA to measure and evaluate program effectiveness at both the local and state level. Please refer to Section (II)(b)(4) of this plan (Assessment), for an overview of how WIOA Section 116 performance

data will generally be used to evaluate program and system effectiveness. This section deals more specifically with how programs will be assessed based on performance targets and projected levels of performance submitted with this plan.

Establishing Performance Levels - The agency administering each core program will be expected to negotiate performance targets with its federal office per applicable guidelines for each core program. The One-Stop Committee identified in Section (II)(c) has established a process to monitor performance levels across the core programs. The WIOA Advisory Group will be responsible for coordinating with the appropriate federal office to negotiate and report statewide performance levels as required by WIOA and applicable regulations.

Local Provider Assessment - Each agency administering a core program will be responsible for establishing a system for collecting, reviewing, and evaluating performance from local providers' data pursuant to the applicable WIOA Title and Regulations, and in alignment with the strategies and processes outlined in this Combined State Plan—including data alignment strategies outlined in Section (III)(b)(6). Each agency will also be responsible for: establishing or negotiating local performance levels or targets as appropriate; ensuring local compliance; and guiding local improvement efforts related to the evaluation of local data.

Core Program Assessment - Each agency administering a core program will be responsible for compiling statewide performance data for that program according to applicable WIOA Title and Regulations and will be responsible for submitting applicable program reports to the appropriate federal office. Each agency will also be expected to establish and implement statewide improvement plans for its applicable programs based on the evaluation of performance data.

B. ASSESSMENT OF ONE-STOP PARTNER PROGRAMS

One-Stop Partners and other Combined Plan partners that are not authorized under WIOA will be assessed against their statutory performance and reporting requirements through the process established by the appropriate federal office. Idaho's workforce system will request that such reports and assessments be made available to other One-Stop partners, the Workforce Development Council, the WIOA Advisory Group, and other stakeholders as appropriate.

Idaho functions as a single statewide planning region and as such the State Workforce Development Council serves as both the State Board and the Local Board. Although performance goals are reported only at the state level, the performance of different local areas is regularly monitored to ensure they are contributing to the overall statewide/regional goals.

To ensure local input into planning processes the State has conducted several planning sessions in each service delivery area. These ongoing planning sessions were used to establish the service delivery design that are outlined in the One-Stop Memorandums of Understanding (MOUs) and may provide additional goals as determined by the service delivery area stakeholders.

C. PREVIOUS ASSESSMENT RESULTS

The following assessment results reflect the actual performance of Idaho's workforce programs at the program level. The performance of each program is directly affected by, and thus reflects, the opportunities, barriers, strengths, and weaknesses identified in the analysis in Section (II) of this plan. As a result, these strategies are based on the factors that currently affect program performance. Therefore, implementing the strategies identified in Section (II) should inherently lead to improved performance outcomes.

For example, attracting and retaining qualified program staff should lead to higher levels of participation, retention, and outcomes for participants. Expanding services to rural communities may initially decrease certain aspects of program performance, as individuals in

these communities have a higher likelihood of facing multiple barriers to employment and education. However, over the long-term, this strategy should improve outcomes as these communities build the capacity to support their residents through continued economic growth.

For Program Year (PY) 2016-2019 plans, certain primary indicators of performance were designated as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. As a result, "baseline" indicators were not used to adjust year-end of performance levels nor were they used to determine failure to meet performance levels. The federal agencies 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. Due to unforeseen circumstances impacting the natural flow of operations, Title II and IV programs have been extended transitional delay in the imposition of sanctions on PY 2020 and 2021 data when available baselines are not sufficient to produce reliable estimates using the Statistical Adjustment Model (RSA-FAQ-22-01 & RSA-TAC-20-02). The Primary Indicators of Performance for all programs under the Workforce Innovation and Opportunity Act are:

1. Percentage of program participants who are in unsubsidized employment (and/or education or training, for Title I-B Youth) during the second quarter after exit. (**Employment Rate – ER Q2**)

2. Percentage of program participants who are in unsubsidized employment (and/or education or training, for Title I-B Youth) during the fourth quarter after exit. (**Employment Rate – ER Q4)**

3. Median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program. (**Median Earnings - ME Q2**)

4. Percentage of program participants 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. (**Credential Attainment Rate – CAR**)

5. Percentage of program participants in an education or training program that led to a recognized postsecondary credential or employment and achieved a measurable skill gain, noting progress towards such a credential or employment. (**Measurable Skill Gain – MSG**)

Title I-B - Youth, Adult, Dislocated Worker

The performance reports for the previous three program years for each of the youth, adult and dislocated worker programs are included in the three tables that follow.

Table 25: Previous Assessment Results for WIOA Title I-B Youth

WIOA Indicator/Measure	PY18 Negotiated	PY18 Actual	PY19 Negotiated	PY19 Actual	PY20 Negotiated	PY20 Actual
ER Q2	69.50%	80.34%	70.50%	80.34%	76.50%	72.20%
ER Q4	50.00%	79.75%	52.00%	79.75%	78%	77.60%
ME Q2	Baseline	$3,912	Baseline	$3,912	$3,991	$4,274
CAR	52.00%	51.04%	55.00%	51.04%	58%	46.90%
MSG	Baseline	40.22%	Baseline	40.22%	50%	49.60%

Table 26: Previous Assessment Results for Title I-B Adult Programs

WIOA Indicator/Measure	PY18 Negotiated	PY18 Actual	PY19 Negotiated	PY19 Actual	PY20 Negotiated	PY20 Actual
ER Q2	77.00%	85.75%	78.00%	85.30%	81.50%	73.60%
ER Q4	46.00%	80.98%	49.00%	85.60%	82.00%	76.90%
ME Q2	$6,000	$7,202	$6,100	$6,593	$6,900	$6,716
CAR	50.00%	63.67%	53.00%	74.70%	70.00%	73.30%
MSG	Baseline	47.23%	Baseline	30.50%	50.00%	64.30%

Table 27 - Previous Assessment Results for Title I-B Dislocated Worker

WIOA Indicator/ Measure	PY18 Negotiated	PY18 Actual	PY19 Negotiated	PY19 Actual	PY20 Negotiated	PY20 Actual
ER Q2	85.90%	83.46%	86.90%	81.90%	80.30%	81.20%
ER Q4	49.00%	83.47%	53.00%	83.90%	81.00%	76.20%
ME Q2	$7,241	$8,016	$7,400	$7,923	$8,016	$7,876
CAR	45.00%	69.08%	50.00%	77.20%	65.50%	73.80%
MSG	Baseline	46.29%	Baseline	22.80%	50.00%	61.20%

Title II - Adult Education and Family Literacy

The Agency administering Title II Program (Idaho Career &Technical Education) is required to negotiate performance targets with the Office of Career, Technical, and Adult Education at the US Department of Education each year. The table below shows the target and actual performance for Program Year PY19 (July 1, 2019 - June 30, 2020) and PY20.

Table 28: Previous Assessment Results for Title II, Adult Education Programs

Educational Functioning Level	PY20 Target	PY20 Actual
ABE Level 1	40%	26%
ABE Level 2	40%	28%
ABE Level 3	43%	30%
ABE Level 4	43%	32%
ABE Level 5	45%	26%
ABE Level 6	15%	40%
ESL Level 1	44%	15%
ESL Level 2	44%	22%
ESL Level 3	41%	19%
ESL Level 4	40%	13%
ESL Level 5	30%	17%

Educational Functioning Level	PY20 Target	PY20 Actual
ESL Level 6	20%	8%

Measurable Skill Gain Assessment

The overall skill gain rate for Idaho's CTE programs was 27% for PY20, compared to 36% in PY18. Despite not meeting the PY20 Educational Functioning Level (EFL) performance goals, Idaho's Adult Education programs have identified trends and performance improvement solutions to address the MSG rate. The overall rate for measurable skill gain varied from 25% to 45% among local programs in PY20.

Three related trends emerged in the PY20 Annual Reports which may help identify some causes of low MSG performance:

- The continued low unemployment rate in Idaho continues to be a challenge for retaining adult education students. Additionally, Adult Education students are balancing classes, childcare, personal, and professional responsibilities. The opportunity cost of attending classes is particularly challenging for many adult education students, as students have significant financial burdens of providing for their families' immediate needs. In addition, region's employers are accepting applicants with less than a high school diploma or GED, and this contributed to lower outcomes.
- The limitations of our current statewide database (Idaho Management & Accountability System) has meant program sites are unable to investigate their data in a meaningful way to determine underlying reasons behind the MSG drop. It is challenging for sites to be able to make data-informed programming decisions and changes due to the database's limitations and low data quality. However, this has been reconciled with securing a new Management Information System called LACES. We anticipate data will be more accurate and reliable moving forward.
- Due to COVID, several outreach sites were closed of which a few are beginning to reopen. This situation in conjunction with a large reduction in attendance led to low MSG outcomes. In addition, program sites are continuing to refine curriculum to better align with the TABE assessment and the new CASAS Math Goals.

Table 29: Previous Post-Exit Outcomes for WIOA Title II Adult Education

WIOA Indicator/Measure	**PY19 Negotiated**	**PY19 Actual**	**PY20 Negotiated**	**PY20 Actual**
ER Q2	Baseline	19.39%	55%	4%
ER Q4	Baseline	39.14%	40%	21%
ME Q2	Baseline	$4,570	$4500	$3900
CAR	Baseline	28.7%	35%	100%
MSG	40.0%	27.0%	40%	27%

Title III - Wagner-Peyser

The performance reports for the previous program years for the Wagner-Peyser program are included below. Under the Workforce Investment Act, Title III programs are considered to have met the performance goals if the actual results are within 80% of the negotiated goal. Idaho's performance results indicate a very high-quality Wagner-Peyser program. Wagner-Peyser is currently not required to include CAR and MSG as active program measures.

Table 30: Previous Assessment Results for WIOA Title III, Wagner Peyser Program

WIOA Indicator/Measure	PY18 Negotiated	PY18 Actual	PY19 Negotiated	PY19 Actual	PY20 Negotiated	PY20 Actual
ER Q2	65.6%	72.90%	66.6%	69.6%	70.1%	64.4%
ER Q4	49.0%	72.90%	51.0%	70.2%	70.0%	65.3%
ME Q2	$4,859	$5,743	$5,110	$5,912	$5,800	$6,135

Title IV - Vocational Rehabilitation

Title IV Vocational Rehabilitation programs are using a phased-in approach to set levels of performance for all primary performance indicators under this Combined State Plan. RSA-TAC-18-01 released January 18, 2018 provided guidance on the requirements for these indicators for PYs 2018 and 2019, noting that the same required levels of performance for PYs 2016 and 2017 be used. The level of performance for PYs 2016 and 2017 were baseline therefore baseline levels of performance will continue to be collected for PYs 2018 and 2019 to be used in establishing initial levels of performance for future negotiation. Later, PY20 was also included in this practice. As a result, not all results are being reported for the Primary Indicators of Performance listed: Data on Measurable Skill Gains are now coming online, and this preliminary baseline is reported in table 31 below. Title IV programs anticipate negotiation of the MSG target for the first time next year, with other 116 primary performance indicators coming online before the next state plan. Title IV programs have provided emerging results for ER Q2 and ME Q2.

Table 31: Previous Assessment Results for WIOA Title IV VR Programs

WIOA Indicator/Measure	PY18 Negotiated	PY18 Actual	PY19 Negotiated	PY19 Actual	PY20 Negotiated	PY20 Actual
ER Q2	Baseline	53.6%	Baseline	59.3%	Baseline	58.9%
ER Q4	Baseline	NA	Baseline	54.6%	Baseline	57.3%
ME Q2	Baseline	$3,734	Baseline	$4,055	Baseline	$4,259
CAR	Baseline	NA	Baseline	NA	Baseline	40.3
MSG	Baseline	35.3%	Baseline	NA	38.5%	52.6%

OAA Title V - Senior Community Service Employment Program (SCSEP)

Performance level goals for each core indicator are agreed upon by USDOL and the grantee before the start of each program year (PY). USDOL evaluates the goals and performance of each grantee annually, making both available for public review. SCSEP performance is measured by seven core performance measures, subject to goal setting and corrective action. These performance measures, along with a description of each, are listed below.

1. Service Level: The number of participants who are active on the last day of the reporting period or who exited during the reporting period divided by the number of modified community service positions
2. Community Service: The total number of hours of community service provided by participants divided by the number of hours of community service funded by the grant.
3. Service Most in Need: Average number of employment barriers per participant. Barriers include having a severe disability; frail; age 75 or older; meet the eligibility requirements related to age for, but do not receive, benefits under title II of the Social Security Act (42 U.S.C. 401 et seq.); live in an area with persistent unemployment; have limited English proficiency;

have low literacy skills; reside in a rural area; veteran; have low employment prospects; have failed to find employment after using services through the American Job Center system; or are homeless or at risk for homelessness.

4. Employment Rate – 2nd Quarter after Exit: The number of participants employed in the second quarter after the exit quarter divided by the number of participants who exited two quarters earlier

5. Employment Rate – 4th Quarter after Exit: The number of participants employed in the fourth quarter after the exit quarter divided by the number of participants who exited four quarters earlier

6. Median Earnings: Of those participants who are employed in the second quarter after the quarter of program exit, the median value of earnings in the second quarter after the exit quarter

7. Effectiveness in serving employers, participants and host agencies: Customer satisfaction surveys for the SCSEP are distributed to all parties in involved in SCSEP efforts (i.e., employers, participants, and host agencies). Easterseals-Goodwill and ICOA are communicating the purpose of the survey to respondents and ensuring that they are being completed appropriately and mailed back on time.

Table 32: Previous Assessment Results for the SCSEP Program

Performance Measure	PY 18 Goal	PY 18 Actual	PY 18 % Met	PY 19 Goal	PY 19 Actual	PY 19 % Met
Service Level	150.0%	123.3%	82.2%	151.3%	143.2%	94.6%
Community Service	75.9%	76.9%	101.3%	76.9%	74.4%	96.7%
Service to Most in Need	2.90	3.11	107.2%	2.90	3.35	115.5%
Employment Rate – Q2	33.5%	19.0%	56.7%	31.5%	21.7%	68.9%
Employment Rate – Q4	32.1%	13.0%	40.5%	26.0%	13.6%	52.3%
Median Earnings	$2792	$2080	74.5%	2758	1734	62.9%
Employer, Participant, & Host Agency Effectiveness	•	•	•	•	•	•
Employers	85.8	N/A	N/A	85.8	N/A	N/A
Participants	79.5	N/A	N/A	80.5	N/A	N/A
Host Agencies	79.7	N/A	N/A	80.7	N/A	N/A

The Department of Labor's Employment and Training Administration adopted as a final rule, without change, the interim final rule (IFR) published by the Department in the December 1, 2017 Federal Register. The IFR revised performance accountability measures for the Senior Community Service Employment Program (SCSEP). The Older Americans Act (OAA) Reauthorization Act of 2016 amended the measures of performance for the SCSEP program in large part to align them with the performance measures mandated for programs under WIOA (listed earlier) and required implementation, including through regulation by December 31,

2017. Below are the core performance measures for PY20 with the newly revised performance measures:

Table 33: Previous Assessment Results for SCSEP Program –WIOA Basis

Performance Measure	PY 20 Goal	PY 20 Actual	PY 20 % Met
Service Level*	N/A	N/A	N/A
Community Service*	N/A	N/A	N/A
Service to Most in Need	2.90	3.47	119.7%
Employment Rate - Q2	28.5%	27.8%	97.5%
Employment Rate - Q4	23.5%	26.3%	111.9%
Median Earnings	$2735	$3656	133.7%
Employers	85.8%	N/A	N/A
Participants	80.5%	N/A	N/A
Host Agencies	80.7%	N/A	N/A

*Because of the pandemic, USDOL determined that *Service Level* and *Community Service* measures would not be tracked due to host agency shutdowns.

SCSEP Strategies to Improve Performance Measures

Community service and Service Level: The U.S. Department of Labor determines every year how many positions will be available for the SCSEP on a national and state level. After negotiations and or funding changes, positions may get modified. The assessment results above show that the performance measures for "Service Level" and "Community Service" were not taken into account due to the effect that the COVID-19 pandemic had on SCSEP participation.

The **employment rate after 2nd quarter** measure did not meet the project goal of 28.5% (actual: 27.8%); however, the **employment rate after 4th quarter** (goal: 23.5%) was exceeded (actual: 26.3%).

The median earnings goal (goal: $2735) for PY 20 was exceeded (actual: $3656). ICOA's subrecipient, Easterseals-Goodwill, will continue working with participants in searching for and securing employment that compensates adequately to maintain this goal.

The **service to most in need** performance measure (goal: 2.90) exceeded the PY goal (actual: 3.47). As positions open Easterseals-Goodwill will prioritize participants with barriers to employment first. Easterseals-Goodwill will also ensure that priority of service is given to veterans and ensure positions are filled in rural areas where employment opportunities are limited.

SCSEP Customer Satisfaction Surveys – American Customer Satisfaction Index (ACSI) for employers, participants, and host agencies: Customer satisfaction surveys for the SCSEP are distributed to all parties in involved in SCSEP efforts (i.e., employers, participants, and host agencies). Easterseals-Goodwill and ICOA are communicating the purpose of the survey to respondents and ensuring that they are being completed appropriately and mailed back on time.

Trade Adjustment Assistance

The Trade Adjustment Assistance (TAA) program does not have state negotiated performance measures. The Trade Adjustment Assistance program previously reported two sets of measures

- those defined by the Trade Adjustment Assistance Act (aligned with WIOA under TAARA 2015) and Common Measures. USDOL only established TAA program goals under Common Measures and not, however, for the TAA measures. The program now reports solely under the first three WIOA primary indicators of performance listed at the beginning of this section.

For FY18, Idaho well exceeded the national results for entered employment rates, which was slightly lower in the previous fiscal year. TAA performance measure period is based on federal fiscal year (FY), which ranges from October through September. FY19 measures October 1, 2018 through September 30, 2019, while FY20 and FY21 would measure the same period the following years.

Table 34: Previous Assessment Results for TAA Program

Measure	FY19 Actual	FY20 Actual	FY21 Actual
ER Q2	83.7%	73.7%	81.8%
ER Q4	86.7%	82.9%	68.8%
ME Q2	$9,738	$9,629	$8,527
CAR	80.0%	84.0%	78.1%
MSG	18.9%	24.2%	61.7%

It should be noted when comparing Idaho's wages to the nation's there is a significant difference between the wage markets. The annual mean wage in the United States for all occupations (May 2020 – U.S. Bureau of Labor Statistics) is $56,310 while the mean wage in Idaho for the same period is $46,800. Increasing wages for the Idaho workforce is definitely a priority and directly corresponds to expanding services to rural communities.

Veterans' Employment

VETS did not initially require states to report on all five WIOA measures since it did not collect all the data necessary to complete reporting on each measure. However, since then, it began data collection for all five which are shown in the table below. This now mirrors reporting for most WIOA Title I-B and TAA programs.

Table 35: Previous Assessment Results for VETS Program

Measure	PY19 Goals	PY19 ID Results	PY20 Goals	PY20 ID Results
ER Q2	64.0%	65.9%	63.0%	63.4%
ER Q4	62.0%	56.2%	61.0%	63.8%
ME Q2	$6,500	$6,067	$5,500	$5,308

Unemployment Insurance

The Unemployment Insurance program has approximately 30 reports that reflect various aspects of the program performance. However in the context of the One-Stop service delivery system, the Unemployment Insurance program will be assessed by evaluating its performance in service delivery to claimants. The cores measure for services to claimants in the UI program are: "All First Payments 14/21-day Timeliness" and "Nonmonetary Determinations 21-day Timeliness." These performance measures reveal the timeliness of processing and paying UI claimants' claims.

The standard for first unemployment insurance payments made within 14 days is 87%. Idaho not only exceeds the standard but ranks among the highest in the nation in its percent.

A second core measure is the timeliness of nonmonetary determinations. A nonmonetary determination is a written notice to the worker and other interested parties which advises of the worker's eligibility with respect to acts or circumstances which are potentially disqualifying. The standard for these decisions to be made is 80% within 21 days. Idaho does not currently meet the standard of 80% but continues to work on methods to improve non-mon timeliness including training, monitoring individual performance and process improvement.

Table 36: Previous Assessment Results for Unemployment Insurance-First Payments within 14 Days

Fiscal Year	First Payments within 14 days	Rank
FY 2013	90.5%	9th
FY 2014	87.2%	24th
FY 2015	96.5%	2nd
FY 2016	96.5%	1st
FY 2017	97.1%	2nd
FY 2018	96.9%	2nd
FY 2019	97.1%	3rd
FY 2020	66.3%	42nd
FY 2021	65.7%	20th

Table 37: Previous Assessment Results for Unemployment Insurance-Nonmonetary Determinations within 21 Days

Fiscal Year	Determinations within 21 days	Rank
FY 2013	69.8%	28th
FY 2014	68.5%	35th
FY 2015	75.4%	35th
FY 2016	79.4%	28th
FY 2017	80.6%	24th
FY 2018	79.7%	30th
FY 2019	78.7%	33rd
FY 2020	77.0%	15th
FY 2021	72.1%	6th

Approximately six years ago, the state modified its unemployment insurance program service delivery strategy. Piloting a change in FY 2014, Idaho centralized its unemployment insurance processing. The results of this change showed cost savings, but also resulted in the standardization of procedures, improved individual performance and policy consistency. The cost savings has been invested in technology towards the development and modification of a new unemployment insurance system.

The centralization strategy also produced improved staff outcomes through consistent training, leading to higher quality levels of service to claimants throughout the state, including those in rural areas. While most customers file online claims, claims are also taken over the phone for those that request it. There are also ten UI navigators located in the Comprehensive One Stop Centers.

D. EVALUATION

The state plans on addressing several technical assistance items identified by the federal review team after the plan's submission.

Under the direction of Idaho's Workforce Development Council, the One-Stop Committee will develop evaluation strategies and processes as required by Section 116(e) of WIOA. These strategies and processes will establish, implement, and utilize methods for continuously improving core programs in order to achieve high-level performance within, and high-level outcomes from, the workforce development system.

The evaluations will be designed with input from the Workforce Development Council and in conjunction with the state agencies responsible for the administration of the core programs. They may include, for example, an analysis of the new service delivery model for rural and remote Idaho, or customer feedback and outcome measures, incorporating data from the performance indicators collected under Section 116 of WIOA. The frequency, scope, and content of such evaluations may be determined by several factors, including but not limited to: performance gaps identified in program assessments, compliance with federal regulations, and the feasibility of such evaluations based on resources and funding.

All partners in the one-stop system will work with their federal oversight agencies to participate in evaluation projects as requested.

In the spring of 2021, several WIOA core partners participated in the Evaluation Peer Learning Cohort 4 (EvalPLC). This project served as an interactive technical assistance forum, comprised of cross-agency representatives from up to six state teams representing core WIOA programs, which collaborated and developed capstone projects (e.g., research design for a specific project, statement of work for a request for proposal for an evaluation, state evaluation action plan) to support the development and implementation of their state and/or local research and evaluations.

As a result of this project, Idaho WIOA Titles I, III, and IV examined and analyzed current evaluation processes and research conducted within each program. With guidance from the EvalPLC project, the team developed research questions related to improving the enrollment process within each agency and identifying next steps for creating a standardization of the enrollment process to inform best practice and training for career planners and frontline staff to ensure comprehensive services for all WIOA participants.

In addition to the EvalPLC project, the Idaho Department of Labor developed and administered an evaluation to gain insight and inform effective training for WIOA Title I-B career planners that included a two-fold process:

1. an Annual Customer Satisfaction Assessment, ; which combines Equal Employment Opportunity (EEO) and Customer Satisfaction. WIOA participants receive a link to an online, voluntary survey from their WIOA career planners. The survey is designed to gather information about One-Stop center accessibility and customer satisfaction, encouraging their feedback about the workforce development system's programs and services.

2. a WIOA Career Planner Survey (Ongoing). With its goals to continuously improve its service delivery to Idahoans, the state began to assess the various ways to improve WIOA Career Planner staff training in May of 2021.

Due to the force of the COVID-19 Pandemic, Idaho quickly shifted away from its standard model of onboarding and training WIOA career planners to a virtual/remote approach. The state initially sought to understand the effectiveness of training new career planners during the pandemic, utilizing the information gathered to identify and close gaps in knowledge and/or technical abilities. After some analysis, the survey project later determined that assessing all WIOA staff, regardless of tenure, would provide a more robust pool of responses, highlighting areas where even seasoned career planners might benefit from additional program training.

This evaluation and research project continues throughout PY21 as responses to the confidential survey are reviewed and tabulated. The analysis of the resulting data will help determine the best approaches the state should pursue to train WIOA staff.

5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

A. FOR TITLE I PROGRAMS

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

All Youth program funds will be allocated using the three required factors of substantial unemployment, excess unemployment, and economically disadvantaged individuals.

- 1/3 of the funds allocated on the number of unemployed residing in areas of substantial unemployment (6.5% or higher unemployment)
- 1/3 of the funds allocated on excess unemployment (number of unemployed over 4.5%)
- 1/3 of the funds allocated on the number of economically disadvantaged youths

The hold-harmless provisions defined under WIOA are applied to the Youth program allocations. Hold-harmless levels are based on 90% of an area's average relative share of the previous two years of funding.

The state Workforce Development Council has updated the policy for "Distribution of WIOA Title IB Formula Funds, Recapture and Reallocation". It was approved by the Council's One-Stop Committee and approved by the full Council on October 13, 2021. The policy ensures that the state's fund distribution model first allocates funding to the state's two local areas. Within the largest local area, funds will be further distributed among the five service delivery areas. The policy directs the state to follow WIOA fund distribution requirements at WIOA Sec. 128(b) and Sec. 133(b) and can be found on the Council's website at : ID Workforce Development Council Funds distribution, Recapture and Reallocation Policy (link)

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

All Adult program funds will be allocated using the three required factors of substantial unemployment, excess unemployment, and economically disadvantaged individuals.

- 1/3 of the funds allocated on the number of unemployed residing in areas of substantial unemployment (6.5% or higher)
- 1/3 of the funds allocated on excess unemployment (number of unemployed over 4.5%)
- 1/3 of the funds allocated on the number of economically disadvantaged adults

The hold-harmless provisions defined under WIOA are applied to the Adult program allocations. Hold-harmless levels are based on 90% of an area's average relative share of the previous two years of funding.

See Section III (b)(5)(A)(i) Youth Activities for information about and link to Idaho's policy on fund distribution.

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

As authorized by WIOA, up to 25% of the state's Dislocated Worker budget will include a set-aside for "Rapid Response" funds. These funds are used to assist local areas with supplemental funds to support services for layoffs that occur throughout the program year.

The state allocates the remaining Dislocated Worker funding to the service delivery areas based upon information that includes insured unemployment data, unemployment concentrations, plant closing and mass layoff data, declining industries data, farmer/rancher economic hardship data and long-term unemployment data. Given that plant closure and mass layoff data is no longer produced by the U.S. Bureau of Labor Statistics, the state will use the sub-state data set of the number of employers with 50 or more initial unemployment insurance claims in their stead. No other informational factors will be used. The data used and weight factors are:

- 0.320 Average number unemployed
- 0.320 Average number unemployed over the state's rate
- 0.320 Number of Unemployment Insurance (UI) claimants with 15 weeks claimed
- 0.020 Number of employers with 50 or more initial unemployment insurance claims
- 0.010 Industry employment declines by annual average monthly employment
- 0.010 Number of USDA Farm Loan borrowers who are bankrupt or delinquent
- 1.000 Total

To mitigate significant shifts in funding for service delivery areas, the Governor defined hold-harmless levels for the WIOA Dislocated Worker funds. Hold-harmless levels are based on 90% of an area's relative share of the previous two years of funding.

See Section III (b)(5)(A)(i) Youth Activities for information about and link to Idaho's policy on fund distribution.

B. FOR TITLE II

I. DESCRIBE HOW THE ELIGIBLE AGENCY WILL AWARD MULTI-YEAR GRANTS OR CONTRACTS ON A COMPETITIVE BASIS TO ELIGIBLE PROVIDERS IN THE STATE, INCLUDING HOW ELIGIBLE AGENCIES WILL ESTABLISH THAT ELIGIBLE PROVIDERS ARE ORGANIZATIONS OF DEMONSTRATED EFFECTIVENESS

The Eligible Agency administering Title II programs is Idaho Career Technical Education. Title II funds are awarded on a competitive basis as multi-year grants to eligible providers, as described below. These competitions adhere to the provisions set forth in WIOA Title II, Section 203(5) - Eligible Providers, and Section 231 - Grants and Contract for Eligible Providers.

The application packet for Title II funds for Sections 231 (Adult Education and Literacy, English Language Acquisition Activities, and Integrated Education and Training), 225 (Corrections Education and the Education for Other Institutionalized Individual), and 243 (Integrated English Literacy and Civics Education) will be released in the spring of 2022. ICTE will provide technical assistance after the release of the application packet through in-person meetings and online

webinars (to ensure statewide accessibility). All applications will be reviewed by a committee using a rubric, the scores to be used as a major consideration in awarding the final contracts, in addition to the review and input of the State Workforce Development Council (serving as Idaho's local board).

Applicants will be notified of the ICTE's decision and awarded funds on July 1, 2022. Initial grants are awarded for a period of two years. Following this two-year period, grantees receiving funds under the initial competition are required to submit annual renewal plans and negotiate budgets and performance targets each year.

Because of Idaho's large geographic size, small population, and relatively low funding levels, the State provides grants for activities defined in Section 231 (Adult Education and Literacy, English Language Acquisition Activities, and Integrated Education and Training), on a regional basis, with one eligible provider per each of the State's six service regions. A single applicant may apply for grants in multiple regions, but must submit separate applications for each, and each regional application will be reviewed and considered separately. The amount of available funds for each region is determined in advance and is based on census data regarding low-skilled populations in each region, historical service levels of each region, and historical funding levels for each region.

Corrections education programs, as defined in Section 225 use the same application as defined above, but are exempt from the regional service provision, and may apply to serve larger or smaller geographic areas. The Section 225 funding amounts are based on historic service and funding levels of incarcerated programs, and shall not exceed statutory limitations, defined as 20% of funds available for local grants in the state.

The Integrated English Language and Civics programs funded under section 243 are exempt from the regional service provision. Section 243 grants may be awarded to multiple providers serving larger or smaller geographical areas than any of the six regions. The amount of funding available for activities under Section 243 for each state is determined at the national level by the US Department of Education.

All applicants may submit for grants under any or all sections 231, 225, and 243.

All applicants (or members of an applying consortium) must meet the requirements of an "eligible provider" defined in section 203(5) of Title II and which includes: a local educational agency; a community-based organization or faith-based organization; a volunteer literacy organization; an institution of higher education; a public or private nonprofit agency; a library; a public housing authority; a nonprofit institution that is not listed in this paragraph but which has the ability to provide adult education and literacy activities to eligible individuals; or a consortium of or coalition of the eligible providers listed here.

Eligible providers must provide evidence of demonstrated effectiveness in providing services to improve the literacy skills of eligible individuals in order to be considered in the grant application process. Idaho scored first for demonstrated effectiveness and only those that passed the criteria were forwarded to the review committee. All applications that passed the screening for demonstrated effectiveness were sent to the state Workforce Development Council to provide feedback on alignment to the State Plan. This feedback will be used by the review committee in making final decisions.

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 Eligible Agency administering Title II programs in Idaho is Idaho Career Technical Education. ICTE oversees all outreach and notification processes, as well as submission and

review processes to ensure consistency and fairness. The announcement, due dates, application submission procedure, and review process is the same for all applicants and across all regions. The same process will be used for reviewing applications. The same application form and rubric is used for all applicants seeking to provide services under Section 231 and Section 225, as described in part (i) above.

A separate, but substantially similar, application form and rubric is used for all applicants seeking funds under Section 243. This application only differs in that it solicits additional information regarding the Civics and Integrated Education and Training components to ensure compliance with the requirements set forth in Section 243 and related regulations.

ICTE issued a Notice of Grant Availability (NGA) in each of the major newspapers serving Idaho. This NGA contains general information about the grant and directed interested parties to ICTE for further information and application materials. Information about the grant was posted on the Division's website and distributed to other core WIOA programs and partners, One-Stop providers, regional planning groups, other state and local stakeholders, as well as groups representing other types of eligible providers such as non-profit and library associations.

Promotional materials directed entities wishing to apply for funding to contact ICTE for a complete grant application packet or packets, including an electronic copy of the application in Word or another format to be completed by the applicant.

C. VOCATIONAL REHABILITATION PROGRAM

Activities authorized under Title IV of WIOA are carried out by two agencies in Idaho. The first is the Division of Vocational Rehabilitation (IDVR) and the second is the Idaho Commission for the Blind and Visually Impaired (ICBVI). The Rehabilitation Services Administration (RSA) distributes funds directly to each VR agency in Idaho.

A Memorandum of Agreement (MOA) between the two agencies determines the percentage to be distributed to each agency from RSA, upon which separate awards are made to each agency. The current distribution is as follows:

Table 38: Funding Distribution for Idaho Vocational Rehabilitation Agencies

Funds	Portion to IDVR	Portion to ICBVI
General VR Program	86.5%	13.5%
Supported Employment	100%	0%
Independent Living	76% (All funds are reallocated to Centers for Independent Living (CILs) and the State Independent Living Council (SILC)	24% (decreases 3% annually for next 3 years)

Both Title IV programs must reserve 15% of the total General VR grant awarded to the State of Idaho for the delivery of pre-employment transition services.

Additionally, 50% of the Supported Employment funds are reserved for youth with the most significant disabilities. ICBVI and IDVR work together on cases where SE and co-enrollment is indicated.

6. PROGRAM DATA

A. DATA ALIGNMENT AND INTEGRATION

Idaho maintains a federated data systems approach with core WIOA programs, consistent with the development of Idaho's Statewide Longitudinal Data System (SLDS) housing primarily educational data and incorporating a limited scope of workforce data by way of participant wage matching. These systems are currently designed to assist agencies in meeting their individual state and federal reporting requirements for program participants and allow analysis of individual wage outcomes through a manual process.

Idaho's Workforce Data Quality Initiative grant engages WIOA core programs to coalesce data sets, based upon the WIOA Joint Performance Report template, for the purposes of program evaluations, outcomes reporting, and predictive analysis. Building upon the existing SLDS, the grant will allow for data exchange between disparate MISs while maintaining appropriate data security and compliance requirements.

With the implementation of WIOA, Idaho's core programs have been working to update data elements within each agency's MIS, consistent with the WIOA Joint Performance Report Template and corresponding PIRL elements. Core program partners have come together to establish a shared data validation policy which incorporates procedures unique to each agency's program design.

IDOL's *IdahoWorks* houses multiple workforce programs' longitudinal datasets, including case management data for multiple programs such as WIOA Titles I and III, Trade Adjustment Assistance (TAA), with employment and wage records originating from Unemployment Insurance (UI) wage data. Developed and administered by America's Job Link Alliance (AJLA), *IdahoWorks* is a web-based, all-in-one labor exchange, reporting and case management solution - a data warehouse and multi-program management information system that collects program participants' data.

The Office of the State Board of Education (OSBE) houses all K-20 data in the SLDS, with case management systems maintained at the agency level, for example, the Idaho Division of Vocational Rehabilitation (IDVR) and its sister agency, the Idaho Commission for the Blind and Visually Impaired (ICBVI). Through the SLDS, OSBE serves as a larger data conduit for public K-20 education (from kindergarten through post-graduate), Idaho Career Technical Education (ICTE), and IDVR. Under Idaho's federated SLDS, each agency retains control of the personal information in its records and safeguards the data according to its own needs and requirements.

While the SLDS is a significant accomplishment, the ability to collect and combine certain Participant Individual Record Level (PIRL) elements to meet joint federal reporting requirements between WIOA Title programs has been missing. Additionally, the reporting tools capable of automatically coalescing the state data and preparing it for direct upload into the federal Workforce Integrated Performance System (WIPS) does not currently exist in Idaho.

Embedded in the WDQI project's design to meet federal reporting objectives is the access to comprehensive Eligible Training Provider data, another federal reporting requirement of WIOA. The plan of the WDQI project's proposed platform extends the automation of data exchange and reporting to address both public and private providers, which contrasts with the state's current SLDS limitation to public postsecondary providers, lacking a means of reliably calculating performance of proprietary schools or training programs. A thorough assessment of the state's training providers to ascertain their impact on Idaho's workforce and economy includes all public and private, educational and training sources.

Upon passage of the Workforce Innovation and Opportunity Act, the Idaho Department of Labor implemented a new MIS for its WIOA Title IB, Wagner-Peyser, Trade Adjustment Assistance, and discretionary grant programs. Provided by America's Job Link Alliance, this system integrates labor exchange, case management, and reporting functions. The system also provides a common exit for individuals in the WIOA Title I-B and III programs.

The core and partner programs have invested considerable funds, time, training, and other resources into each of their existing programmatic management information systems, consistent with WIOA reporting elements. Core partners are currently working together to create a secure web-based portal for existing agency datasets to collect common WIOA joint performance report data elements, aggregate them and assist in generating required federal reports for Idaho agencies receiving WIOA funds under Title I, II, III, IV and Trade. The following Idaho state agencies and entities are working collaboratively to fulfill these goals:

IDOL, IDVR, ICTE, ICBVI, OSBE and the Workforce Development Council. Current inter-agency policies and procedures will be reviewed, modified and/or developed to reflect this data exchange platform, as it differs from Idaho's Data Management Council's (DMC) policies and procedures intended for research. The web-based platform will be designed to accommodate additional WIOA-required partners as they engage in Idaho's One-Stop Network. Secondary outcomes of these activities include:

- Identification and reporting of WIOA co-enrollments, leveraging opportunities for savings
- Integration of datasets to facilitate evaluation, research and decision-making
- Access to merged public/private education and wage data for automated ETP reporting
- Predictive analysis to better determine potential outcomes and expose risk
- Individual and combined outcomes of project partners for:
- dashboard development
- JobScape data inputs for consumer choice

This plan has allowed programs to update their data collection processes and individual MIS systems to become WIOA-compliant as soon as possible, while taking steps toward fuller integration over the long term. Each program continues collecting data via different systems, using an ad-hoc data sharing process for exporting, sharing, matching, and importing data. This revised data sharing process, however, along with several other agreements allow core programs to report required elements under WIOA.

In an effort to update data collection processes, the state's core program partners conducted an analysis of each programs' MISs as well as the data collection and reporting needs of individual programs and the workforce system as a whole. This has led core programs to continue to fine tune their individual data systems to ensure alignment with WIOA requirements.

The WIOA Advisory Group, applicable optional partners, and other affected stakeholders will convene a working group for data integration. This group will consist of program staff, IT staff, and vendors for existing systems. Their plan going forward is to conduct an analysis of applicable intake processes across the system and identify areas of duplication, or opportunities for integration and work towards creating a framework for how a system will connect individual MISs and what that might look like.

Joining this effort with the WDQI grant awarded to the Idaho Department of Labor will do much to improve the state's ability to automate data exchange processes within Idaho's workforce development system. Additionally, this data will feed into IDOL's Labor Market Information (LMI) tool known as JobScape. JobScape is an easy-to-use, mobile-friendly career and educational training search tool that provides occupation descriptions, wages, worker demand, current employment, and the number of certificates and degrees awarded from Idaho's public postsecondary for-credit programs. Users, Idaho students and job seekers, can search by keywords, occupation/job titles, military occupation titles or codes, or commonly used job title acronyms. JobScape enhancements would include non-credit program and aggregate ETP

participant rates of wages, employment, graduation/program completion, and credential attainment. With this easily accessible data, customers can make more informed career and educational training decisions.

The Workforce Development Council, appointed by the Governor, will provide leadership for data integration efforts through its One Stop Committee. Agency leaders from WIOA core and optional partners participate in the One Stop Committee and have the ability to identify resources and expertise to support efforts brought forth by the WIOA Advisory Group.

Previous efforts to implement common intake and a technology solution that could overlay the individual partner's systems have stalled and a new course of action is set in place in Section II(b)(2) under the focus area of Improving Public Awareness and Access to the Workforce System. Prior to looking at data integration, the questions of how many individuals would be impacted and whether it would improve service delivery need to be answered. Since referrals across programs are low, processes need to be developed and implemented before data integration efforts are launched.

The state's Workforce Data Quality Initiative grant (WDQI - referenced earlier in Section III.b.6.A.i.) will assist the Workforce Development Council in this effort, providing the data necessary to help improve system alignment in Idaho. Guided by the Workforce Development Council and based on the data generated by WDQI, Core and One-Stop partners can focus on the development of potentially new service delivery models to improve participant outcomes throughout the state's workforce development system.

As per Section 116 of WIOA, as well as applicable federal regulations, the State's still plans to be on the cusp of submitting a single annual report covering all programs before the expiration of this four-year plan. This is in addition to the reports already submitted by individual programs to their respective federal agencies if required.

The core program partners, working together with the WDQI processes in development and using SLDS database processes to address the requirements under the Family Educational Rights and Privacy Act (FERPA), plan to incorporate education and state wage data with WIOA cases management data into the current PIRL file schema to exchange, merge and report on behalf of all Idaho WIOA Title IB, II, III and IV grantees.

To fully incorporate the use of unemployment insurance data for performance reporting, the combined plan partners have executed the state's SWIS data sharing Memorandum of Understanding which allows core program partners additional options for the collection, exchange and reporting of required data. We anticipate that the process will involve individual programs sending their performance information to a single entity (likely the Idaho Department of Labor) who will compile and submit the State Annual Report to the US Department of Labor. As noted earlier, the WDQI grant will help to facilitate partner's abilities to meet WIOA quarterly and year-end reporting requirements through its automated data exchange process. The core partners required to report under Section 116 will issue a Memorandum of Understanding that identifies who this entity will be, the responsibility of that entity for submitting on behalf of the core programs, and the process for submitting program performance data to this entity.

The eligible agencies administering core programs will be responsible for submitting program-specific reports in accordance with applicable Titles under WIOA, federal guidance from their respective Departments, and other statutes to which they are accountable (for example, the Rehabilitation Services Administration and The Rehabilitation Act for Title IV programs). In addition, activities generated under this plan will lay the foundation to incorporate additional Idaho-based WIOA partner program reporting via automated, electronic means.

B. ASSESSMENT OF PARTICIPANTS' POST-PROGRAM SUCCESS

Idaho's workforce system will primarily measure participant progress using the indicators defined in WIOA Section 116 and subsequent guidance. Many of the data elements required to track participant progress in employment and post-secondary education are already collected in some fashion by at least one of the lead State agencies administering a core program. These performance indicators track participants' post-program employment in the second quarter and fourth quarter after exit, as well as credential attainment up to one year after program exit.

For example, The Idaho Department of Labor houses all of the WIOA Title I-B programs, as well as Wagner-Peyser, and the Unemployment Insurance program. As a result, they are able to provide other core partners with wage and employment records. Both Title II (Adult Education) and Title IV (Vocational Rehabilitation - IDVR) programs are housed in separate divisions of the State Board of Education, allowing them access to post-secondary enrollment data via the National Student Clearing House, as well as the State's Longitudinal Data System for Education.

Currently, the existing data sharing agreements established continue to allow core programs to share and report progress measures for WIOA participants. Data sharing agreements negotiated under WIOA follow a similar structure as before. For example, the Adult Education program presents its Employment cohort lists to the Department of Labor to determine employment status of students after exit. As noted earlier, these processes will continue.

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

As mentioned in the previous section (III)(b)(6)(B), Assessment of Participants' Post-Program Success, the Idaho Department of Labor currently administers both WIOA Title I-B and Title III programs, as well as the Unemployment Insurance program for Idaho. All of the core partners have a current MOU with the Unemployment Insurance program via the Idaho Department of Labor to use wage records from the UI system for WIOA performance reporting and evaluations. These records are used to determine the employment status of program participants after exit from their respective WIOA programs. The results then guide program improvement and system alignment, as well as federal reporting purposes under Section 116.

The Department of Labor's Communication and Research Division utilizes Idaho's UI data to conduct a labor market information analysis, which supports the findings under Section (II)(a) of this Plan - Economic, Workforce, and Workforce Development Activities Analysis.

D. PRIVACY SAFEGUARDS

Currently, each of the core programs under WIOA maintains its own management information system (MIS) and adheres to the standards and laws which are applicable to the population being served and the data being collected therein. Participants (or their legal guardians where applicable for those under 18 years of age) are asked to sign release of information waivers, as appropriate, and are advised of their right to decline to share their information outside of the program to which they are applying. Provision of information is voluntary except where such information is necessary to determine program eligibility.

Additionally, data-sharing agreements between core and optional partners will provide specific and explicit instructions as to which data can and cannot be shared between programs, and under which circumstances.

With respect to privacy safeguards related to the General Education Provisions Act and other applicable Federal laws, the Idaho Data Management Council (DMC) is a council that was established to make recommendation on the oversight and development of Idaho's Educational Analytics System (EASI) and oversees the creation, maintenance and usage of said system, including safeguards for student data and privacy concerns.

The Idaho Department of Labor cooperates with the EASI through the Statewide Longitudinal Data System (SLDS) agreement, following Council and agency policies and procedures for secure data sharing.

The purpose of the EASI is to allow longitudinal tracking of students from preschool through all levels of the public education system (elementary, middle and high schools, college and graduate school) and into the workforce. To reflect this scope, the EASI is referred to as a P-20W system. This system will collect data from a variety of disparate source systems, including the K-12 system developed by the State Department of Education, the systems in use at the various postsecondary institutions, the State Department of Labor, the National Student Clearinghouse, and others, and will transform that data into a single, coherent structure on which longitudinal reporting and analysis can be performed.

The privacy of all student level data that is collected by the EASI is protected. A list of all data fields (but not the data within the field) collected by the EASI is publicly available. Only student identifiable data that is required by law is shared with the federal government.

In order to advise and make recommendation to OSBE on the implementation of the EASI, the DMC will report to OSBE through the Planning, Policy and Governmental Affairs Committee. The scope of responsibilities of the DMC includes the following:

1. Data Standards and Quality

- Ensure that all data elements within the EASI are clearly and unambiguously defined and used consistently throughout the system.
- Ensure that the data within the EASI is as complete and accurate as possible and complies with the agreed upon definitions.

2. Access and Security

- Establish parameters for security and encryption of data uploads, data storage, user roles and access, privacy protection, and appropriate use of data.
- Review and approve mechanisms (technical and procedural) for implementing the required security and access rights.
- Establish guidelines for responding to requests for data access by various stakeholders, including school, district and college/university staff, education researchers, and the public.

3. Change Management and Prioritization

- Propose enhancements to the EASI , review enhancements proposed by other groups, and set priorities for the development of those enhancements.
- Review and approve or deny any proposed changes to existing functionality, data definitions, access and security policies, etc.

4. Training and Communication

- Establish guidelines for training of EASI users, and review and approve specific training plans.
- Ensure adequate communication concerning the EASI. In each of these areas, the DMC shall develop policies and procedures for OSBE approval as appropriate.

Members of the Data Management Council include the Office of the State Board of Education, Idaho Department of Labor, Idaho State University, Career Technical Idaho Division of Career Technical Education, North Idaho College, University of Idaho, and the Idaho Department of Education.

7. PRIORITY OF SERVICE FOR VETERANS

As outlined in Section (II)(a)(2) State Workforce Development Activities, the Jobs for Veterans State Grant program is operated by the Idaho Department of Labor (IDOL), which also administers all Title I-B and Title III programs, as well as Unemployment Insurance and Trade Adjustment Assistance programs. More information about the specific activities and services available through these programs are outlined in the Activities Analysis. Because these programs are administered by the same agency, the department has policies in place that ensure consistency in providing appropriate priority of service for veterans across all of these programs. This also ensures effective referrals and co-enrollment where appropriate. A copy of the department's Priority of Service Policy can be found as an appendix to this modification.

Wagner-Peyser and Veteran State Plans both outline veterans' priority of service and are also highlighted in the WIOA Title I-B Eligibility Technical Assistance Guide (TAG) for career planning staff throughout the state. Updates to the Wagner-Peyser and Veteran State Plans are included in this Combined State Plan under "Program Specific Requirements."

The Idaho Department of Labor requires all American Job Center (AJC) managers attend the annual state veterans' training where a significant amount of time is spent discussing priority of service for veterans and eligible spouses. These staff are able to share this information with partners within AJCs to ensure they have an understanding of the priority veteran customers reserve.

Implementation and monitoring of the state's Priority of Service Policy

American Job Center staff are frequently reminded that Priority of Service (POS) for covered persons is mandated for any services funded entirely, or in part, by the USDOL. The most basic Priority of Service measure is extended to covered persons by notifying them that they are entitled to priority of service. Signage in Idaho's AJCs informs covered persons that they have Priority of Service before non-covered persons and encourages them to identify themselves as veterans in the automated system and to office staff. This is also noted on the covered person's registration. AJCs have incorporated a questionnaire into the front desk duties. This questionnaire is given to covered persons and helps staff determine the appropriate service and service provider. (See bulleted list below).

Historically, Idaho has not encountered any issues with providing priority to covered persons in these programs. However, if resources become scarce and more competitive, covered persons will be accepted before qualified non-veterans as noted in the Priority of Service policy as mentioned earlier.

The State Veterans' Coordinator (SVC) provides quality control and ensures that Priority of Service processes and procedures are implemented. The SVC reviews the entire AJC office veterans' operations, analyzing data on services and outcomes for veterans. The SVC provides a written report to Idaho management staff that evaluates the office's implementation of priority of service measures

Monthly veteran program meetings with local management and veteran staff are conducted on a statewide basis to review processes and identify necessary improvements in which Priority of Service is discussed. If necessary, process improvement or corrective action plans are developed.

Additionally, the state's Recently Registered Veterans report is periodically reviewed. When an eligible person is identified a DVOP sends an introductory email listing IDOL's services, and the eligible person is encouraged to contact the DVOP for additional services. Otherwise, an ES staff member contacts them. The covered persons receive various informational handouts, resume assistance, job search strategies, and information on community resources. They are also provided a review of the veteran section of the IDOL web page showing a list of veterans' services offered by IDOL. If a covered person does not qualify for DVOP services, an Employment Services staff member will review the covered person's IdahoWorks registration.

In addition to the items listed on the previous page, the state has taken these additional steps to ensure priority of service for covered persons:

- Idaho has designated Local Veteran Employment Representatives (LVERs) and the Consolidated Positions to provide Priority of Service training in their local American Job Centers as often as needed. LVERs will also provide training to smaller offices that do not have a Jobs for Veterans State Grant (JVSG)-funded staff member.
- Signage is posted in all American Job Centers asking veterans to identify themselves to any local office staff.
- Front desk staff are instructed to ask the covered person to complete an intake form that lists all the Significant Barriers to Employment (SBEs) recognized by USDOL VETS. Completion of this form helps to determine eligibility for DVOP services or if a referral to an Employment Services consultant is appropriate.
- All American Job Centers have pamphlets outlining the department's promise to covered persons, including Priority of Service, how the state administers this preference, and other useful information.
- Recently separated veterans are the first priority in the referral of UI claimants for the RESEA program.

IDVR has a cooperative agreement with the U.S. Department of Veterans Affairs (VA) Veterans Readiness and Employment (VR&E) Program, the purpose of which is to ensure seamless, coordinated, and effective vocational rehabilitation services to Idaho's veterans with disabilities and dependents with disabilities, improving cooperation and collaboration between the two agencies, avoiding duplication of services, improving inter-agency communication, and to establish staff cross-training opportunities.

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

In order to fully address the various components of accessibility, this section is broken into four main topics:

- Internal policies and procedures that ensure compliance, accessibility, and effectiveness
- Training and professional development available to program staff and One-Stop staff
- Accommodations available to individuals with disabilities to ensure accessibility
- One-Stop Certification Policy

Policies and Procedures

All core and combined plan partners, in conjunction with the state's equal opportunity (EO) officer, work to maintain a Non-Discrimination Plan that provides a comprehensive set of actions to ensure that the American Job Centers in Idaho address the needs of customers with disabilities, to include the full array of available services. All of the state's One-Stop centers

comply with ADA Amendments Act (ADAAA) legislation to ensure access for persons with disabilities, providing for the most integrated setting practicable. The state's facilities procurement process incorporates ADAAA guidelines to ensure access to new or renovated One-Stop center facilities.

The state's EO officer works with the Idaho Department of Labor EO officer, who acts as the liaison with other units of the department such as the Disability Determinations Service and the Human Rights Commission, as well as external disability support organizations such as the Vocational Rehabilitation programs and the Council on Developmental Disabilities, to ensure policies are communicated and to foster these groups as resources for customers with disabilities.

American Job Center program service delivery staff provide individuals with disabilities special consideration for labor exchange services. WIOA Title IB program policies consider an individual with disability as having a verifiable impediment to employment. The programs treat individuals with disabilities as a family of one in determining income for program eligibility, giving them an additional opportunity for participation in intensive and training services. Youth with disabilities are given the highest priority of service within Idaho's youth programs.

Through an earlier Disability Employment Initiative (DEI) grant, the Idaho Department of Labor facilitated the development of training to One-Stop staff across the state and laid a foundation of resources for continuous improvement of services to and employment outcomes of individuals with disabilities. Through information and materials gathered from expert local and national sources, the grant efforts are being sustained through publications such as the comprehensive job search handbook, Willing and Able: A Job Hunting Guide for Idahoans with Disabilities *(link)* and its subsequent companion handbook, Willing and Able: A Job Hunting Guide for Idaho Veterans with Disabilities (link). Disability etiquette guides, local resource flyers, referral information and other materials disseminated via the DEI grant remain available to Idaho Department of Labor staff and will be shared with other American Job Center program staff.

A statewide training was conducted after the development of training materials to ensure the tools and information created through the grant's period of performance were sustainable. Despite the DEI grant's end, the knowledge imparted through the training and tools developed as a result of the grant continues to be the cornerstone of services to individuals with disabilities throughout the One-Stop system. All of which have resulted in improved coordination with, and referral to partner services and community resources, enhanced understanding of the needs of those with disabilities and improved ability to develop employment opportunities. As prescribed by Wagner-Peyser Section 8(b), each One-Stop center maintains at least one staff member who is well equipped to provide the unique level of support needed by individuals with disabilities seeking entry or re-entry into the workforce.

Idaho's Vocational Rehabilitation programs also provide technical assistance where needed, and can provide or connect other core WIOA and partner programs to additional training available through national resources. A brief list of additional resources compiled by the Idaho Division of Vocational Rehabilitation is available below:

- National Clearinghouse of Rehabilitation Training Materials provides resources on accessibility to meet requirements of Section 508 (accessible electronic and information technology for federal agencies) of the Rehabilitation Act of 1973.(link)
- The ADA National Network Centers made up of ADA professionals and experts charged with assisting businesses, state and local governments, and people with disabilities as they manage the process of changing our culture to be user friendly to disability and the effect the variety of health conditions can have on society. Training on all aspects of the ADA is one of the major tasks of the Northwest ADA Center.(link)

- The Idaho affiliate of the Northwest ADA Center-Idaho is formerly known as the Idaho Task Force on the ADA. There are four partners in the ADA coalition composed of the three Idaho Centers for Independent Living (CIL) and a state coordinator.
- The Job Accommodation Network (JAN) is the leading source of free, expert, and confidential guidance on workplace accommodations and disability employment issues. Working toward practical solutions that benefit both employer and employee, JAN helps people with disabilities enhance their employability, and shows employers how to capitalize on the value and talent that people with disabilities add to the workplace. askjan.org

Accessibility and Accommodations

All of Idaho's nine comprehensive and affiliate American Job Centers are equipped with accessible computers built primarily with accessible peripherals and software to accommodate a variety of disabilities. Customers with disabilities can come to the centers during office hours and access center programs and information sources. And, with the Idaho Department of Labor's transition to its new service delivery model, any customers with specific accommodations who finds that an advertised location, for some reason, does not meet their need, can rest assured that remote staff will meet them in a location that does. In addition, state policy requires all partner programs that provide services at the One-Stop centers do so in a manner that meets requirements of Section 188 affording programmatic and physical access to services.

Partner-provided services are also available to meet specific One-Stop customer needs. The One-Stop staff collaborate with ICBVI and/or the Deaf and Hard of Hearing to obtain information for customers in Braille, tape or large print versions or access to the qualified Sign Language Interpreter directory.

As core partners, both ICBVI and IDVR's goal is to provide all individuals, regardless of disability, with equal access to its program. Individuals who have complaints or wish to provide input on accessibility issues associated with ICBVI may contact the Administrator or the Rehabilitation Services Chief. Furthermore, if customers wish to report an issue related to the accessibility of the IDVR program, they may do so by submitting a complaint to IDVR's Section 504 Coordinator via e-mail or written correspondence. Contact information is posted on the Division's website. Complaints may also be sent to the Office of Civil Rights. Contact information is available at ed.gov/ocr. The Division conducts programmatic and physical accessibility evaluations of all regional offices for Section 188 compliance and is working to make its website accessible.

Through the Ticket to Work program, core WIOA partners have certified Work Incentives Benefits Practitioners to offer benefits counseling to participant ticketholders on how employment affects Social Security benefits.

Recently, the Governor required that all state agencies work to employ accessible web products and publications wherever possible. As a result, One-Stop programs administered by state agencies have sought to include alternative text capability to ensure clear communications regardless of the process utilized by the customer. The state EO officer coordinates with WIOA core partners to ensure alternative text and other appropriate information are included and in effect on electronic publications.

Part of the State Workforce Development Council's One-Stop certification policy includes annual physical and programmatic accessibility for individuals with disabilities. The certification criteria reference the ADA Checklist for Existing Facilities as recommended by the Northwest ADA Center. The full checklist is located here (link). The state's EO office developed a checklist

for programmatic accessibility along with an updated EO Survey. All WIOA funded programs are required to report annually to the state EO Officer the results of their physical and programmatic assessments and survey results which will better inform WIOA programs where accessibility improvements need to be made.

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

The state workforce system provides a variety of services to those with limited English proficiency (LEP). Staff at Idaho American Job Centers have two primary means of providing language assistance: oral interpretation, either in person or via a telephone interpretation service such as the *LanguageLink,* or written translation. One-Stop staff receive training on how to use the *LanguageLink* as part of their initial staff training. At a minimum, LEP customers will be offered oral interpretation services to help them access and understand recipient programs. This service ranges from onsite interpreters for critical services provided to a high volume of LEP customers, to accessing assistance through commercially available telephonic interpretation services. Written translation, which is provided as necessary, can range from translation of an entire document to translation of a short description of the document.

The Idaho Department of Labor is the primary service provider and location manager of all comprehensive and affiliate American Job Center locations in Idaho. The Idaho Department of Labor maintains a comprehensive policy clarifying the Department's responsibility for providing persons with limited English proficiency meaningful access to agency programs and services as required by Executive Order 13166, Title VI of the Civil Rights Act of 1964 and Section 188 of the Workforce Innovation and Opportunity Act. This policy not only includes instructions on reasonable steps to provide meaningful access, it describes potential discriminatory practices, staff training and processes for monitoring and complaints.

Alongside the agency's policy for Serving Limited English Proficient customers are training materials and resources available for AJC staff. The resources include instructions and tips for using the *LanguageLink* service for interpretation services and process for agency translation requests. WIOA Title II providers also use the *LanguageLink* service to support limited English proficient students when needed. Alongside this service, staff members participate in professional development training on serving limited English proficient students.

In addition, with advance notice, core partners ICBVI and IDVR provide interpreter services for their clients and customers, in the customer's preferred language, to meet their needs as they seek services. Both agencies utilize state contract providers for these services. In addition, IDVR also uses CTS *LanguageLink* or Linguistica International to assist with real-time interpretation when advance notice is not provided. ICBVI has a staff member who is fluent in Spanish and provides assistance, when needed, to all regions of the state.

IV. COORDINATION WITH STATE PLAN PROGRAMS

Description of the 2022 State Plan Modification Process

For the 2022 WIOA Combined State Plan Modification, the State Workforce Development Council convened a series of meetings, beginning fall of 2021, to bring together all WIOA strategic and core partners (Idaho's WIOA Advisory Group). Partners reviewed progress towards implementation of the 2020 WIOA Combined State Plan and noted successes, challenges, and changes. Updates to this plan are from findings in meetings of Idaho's WIOA Advisory Group and One-Stop Committee, along with ongoing input from employers, workforce partners, state agencies, and others. Core and partner program staff continually meet to explore and enhance best practices for providing job seekers employment and employers well-trained candidates.

Meetings of the WIOA Advisory Group were posted in accordance with Idaho Open Meeting Law on the WIOA State Plan Section of the Council's website. The agendas specified which sections of the plan were going to be reviewed and updated.

The 2022 Combined WIOA State Plan Modification is created through coordination and collaboration of all the strategic and core partners and the programs each represent (see section on initial state plan process below) : Idaho Workforce Development Council, Idaho Commission on Aging, Idaho Commission for the Blind and Visually Impaired, Idaho Department of Labor, Idaho Division of Career Technical Education, and Idaho Division of Vocational Rehabilitation. It also includes input and contributions from: Idaho Department of Health and Welfare, Idaho Commission for Libraries, Easterseals-Goodwill, ExperienceWorks, and East Central Idaho Planning and Development Association.

Input from the public and other stakeholders was solicited as part of Idaho's Public Comment Process. The comment period for the plan was available from February 3, 2022 through February 25, 2022. The plan was housed on the state's Workforce Development Council's website, with core and One-Stop partners with links to the plan from their own websites. The information was also shared statewide through both the Idaho Association of Counties and the Idaho Association of Cities and their respective membership.

Description of the State Plan Development Process

The WIOA State Plan partners (known as the WIOA Advisory Group) developed the WIOA 2020 -2023 Combined State Plan between July 2019 and February 2020. The Workforce Development Council's executive director Wendi Secrist led the plan development process through a series of public meetings. This includes 16 listening sessions that were held in:

- Hailey
- Twin Falls
- Pocatello
- Fort Hall
- Caldwell
- Payette
- Boise
- Salmon
- St. Anthony
- Preston
- Coeur d'Alene
- Bonners Ferry
- Plummer
- Lewiston
- Cottonwood
- McCall

All listening session invitations were sent to local media, local elected officials, chambers and other business organizations, and workforce system partners for distribution. Nearly 250 individuals attended the listening sessions.

Following the listening sessions, an all-day strategy session was held on November 12, 2019 to develop the goals and strategies for the WIOA State Plan under the umbrella of the Council's strategic plan which was approved on July 18, 2019. Over 25 representatives of the workforce system partners attended and contributed. Through a technical assistance grant, USDOL provided facilitators for the session.

Meetings of the WIOA Advisory group were posted, in accordance with Idaho Open Meetings Law, on the WIOA State Plan section of the Council's website, with a banner linking directly to the page from the home page. These agenda identified specific sections of the Combined State Plan to develop/review. Following the meeting, the modified sections with tracked changes were posted on the State Plan website.

The following individuals, representing the partners participating in the WIOA Combined State Plan contributed and were responsible for its program-specific content.

- **Idaho Workforce Development Council** – Wendi Secrist, Executive Director, Matthew Thomsen, Business Partnership Manager, Caty Solace, Outreach & Communications Manager, Amanda Ames, Finance and Grant Manager. Council staff represented the State Workforce Board. Paige Nielebeck, Management Assistant ensured that plan development complied with Idaho's Open Meetings Law.
- **Idaho Commission on Aging** – Admir Selimovic, SCSEP Program Specialist. Admir represented the Combined Partner program of Senior Community Service Employment Program.
- **Idaho Commission for the Blind and Visually Impaired** - Mike Walsh, Rehabilitation Services Chief. Mike represented Title IV programs administered by the Commission.
- **Idaho Department of Labor** – Kristyn Carr, Workforce Administration Program Operations Manager, Rico Barrera, Senior Planner, Janell Hyer, Research Analyst Supervisor, and Laurel McMahon, Workforce Services Program Operations Manager. Michael Johnson, Deputy Director, Unemployment Insurance administrator. Kristyn and Rico represented all core and partner programs (except for Unemployment Insurance) administered by the Department, including Title I-B, Title III, Veterans Employment, and Trade Adjustment Assistance as the administrative entity and fiscal agent. Laurel McMahon represented the Title I-B programs as a service provider. Janell Hyer provided all of the updated labor market information in the economic and workforce analysis section of the plan. Michael Johnson represented input from the Unemployment Insurance program.
- **Idaho Career & Technical Education** (ICTE**)** – Molly Valceschini, State Coordinator for Adult Education and GED Administrator. Molly served as the State Plan Lead, represented Title II programs, and also provided a link to Carl D. Perkins programs via the Division (the Perkins program did not participate in the Plan, but is a close partner in the workforce development system).
- **Idaho Division of Vocational Rehabilitation** - Teresa Pitt, Planning and Evaluation Manager; and Matt Markve, Program Evaluation Analyst. Teresa and Matt represented the Title IV general VR program administered by the Idaho Division of Vocational Rehabilitation.

Other WIOA partners, while not participating in the combined plan, contributed to the development of the state's strategies and goals. They include:

- the Idaho Department of Health and Welfare representing TANF and SNAP Employment & Training,
- the Idaho Division of Career & Technical Education representing Perkins,
- the Idaho Commission for Libraries,
- North Idaho College as a WIOA Title I-B service provider,
- Easterseals-Goodwill and ExperienceWorks as state and federal service providers, respectively, for the Senior Community Service Employment Program, and
- East Central Idaho Planning and Development Association as a local workforce development board.

Additionally, input from the public and other stakeholders was solicited as part of Idaho's Public Comment Process. The comment period for the plan was available from March 2, 2020 through March 23, 2020. The plan was housed on the state's Workforce Development Council's website, with core and One-Stop partners with links to the plan from their own websites. The information was also shared statewide through both the Idaho Association of Counties and the Idaho Association of Cities and their respective membership.

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

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 administrating the core programs, required one-stop partners and the	Yes

The State Plan must include	Include
other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	
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

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

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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

A. GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

Idaho is identified as a single statewide planning region, consisting of the two former WIA local areas –

1. Balance of State and
2. East-Central District.

Draft policy criteria for local area designation and appointment of local board members were posted and presented to the Workforce Development Council at the July 2015 public meeting in Idaho Falls. The criteria were modified and approved by the Governor and then posted for public comment on the Idaho Department of Labor website for 30 days from August through early September 2015. Local public officials were notified via the Idaho Association of Cities to ensure that all Idaho mayors and county clerks received direct notice of the policies and opportunity to comment. *No comments were received.*

At the October 19, 2015 public meeting, the Workforce Development Council adopted the WIOA local area designation policy and policy for appointment of local board members. Both local areas met the policy criteria for "performed successfully" and "sustained fiscal integrity" as described below.

Performed Successfully - Met or exceeded the negotiated levels of performance for the last two consecutive program years, and has not failed any individual measure during the same period.

Sustained Fiscal Integrity - The Secretary of Labor has not made a formal determination that either the grant recipient or the administrative entity of the area misspent funds due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration for the two-year period preceding the determination

On April 7, 2020, the state Workforce Development Council updated its initial Designation of the Local Area policy and developed a policy for identifying region(s). Although these were posted for public comment during the state's PY2020-2023 Combined State Plan process and no comments were received, the state has determined that it may need to revise the Local Area designation policy to incorporate several changes as directed by USDOL.

Local Area Designation and Policy (link to draft policy)

Region Identification and Policy (link)

Denial of Local Area Designation

A unit of general local government that requests but is not granted designation as a local Workforce Investment area under section 106 (b) (2) or (3) may submit an appeal to the State Workforce Development Council.

All such appeals shall be in writing and be filed within twenty (20) calendar days of the date the denial letter was mailed by the Governor or the Governor's designee. The appeal must include all factual and legal arguments as to why the appeal should be granted. The appeal shall be filed with the:

Executive Director of the Workforce Development Council
317 West Main Street
Boise, Idaho 83735.

The Executive Director shall promptly acknowledge receipt of the appeal.

The existing designated workforce areas will continue while the appeal is in progress and will be modified should the initial denial of designation be overturned.

(i) Appeal to the State Workforce Development Council

The appeal shall be deemed timely filed if it is received by the Executive Director of the Workforce Development Council within the 20-day period, unless the appeal is filed by mail, in which case the official postmark affixed by the U. S. Postal Service shall be deemed to be the date of filing. Any appeal that is filed late shall be summarily dismissed.

The Chair of the Council will select a hearing officer. The appeal shall be heard by the hearing officer not more than forty-five (45) days after the appeal was filed. With the consent of the appealing party, the hearing may be held after the 45-day period, but in no case shall the hearing be conducted more than sixty (60) days after the appeal was filed.

The hearing officer shall inform the appellant of the date, time and place of the hearing by written notice mailed at least ten (10) calendar days in advance. The appellant shall have the right to present testimony and documentary evidence, to offer evidence in rebuttal, to present oral argument and to be represented by legal counsel. All testimony received by the hearing officer shall be under oath or affirmation. If the appellant retains legal counsel, federal WIOA funds cannot be used for remuneration.

An appellant must establish that it is entitled to designation as a local area according to this policy and WIOA.

Within fifteen (15) days of the hearing, the hearing officer shall issue a recommended decision, which shall include findings of fact, recommendations and the basis therefore. That decision shall be mailed to the appealing party. The hearing officer shall file a copy of the recommended decision with the Executive Director of the Council.

The recommended decision of the hearing officer shall be placed on the agenda of the next Council meeting for disposition, if there are at least 14 calendars days remaining prior to the meeting; however, if no Council meeting is scheduled within forty-five (45) days of the date the decision was issued, a special meeting of the Council, or a Committee designated by the Chair, shall be conducted within that 45-day period to accept, reject or modify the hearing officer's recommended decision.

In its deliberations, the Council shall consider only the evidence presented to the hearing officer. The Council shall not receive or consider any evidence not presented to the hearing officer. The decision of the Council shall be reduced to writing and be mailed to the Governor and the appealing party. The decision must set out in summary fashion the Council's findings and conclusions. The Council may adopt, in whole or in part, the findings of fact, recommendations and rationale of the hearing officer.

(ii) Appeal to USDOL

If a timely appeal of the decision does not result in the requested designation, the unit of general local government or grant recipient may further appeal the designation decision to the U.S. Secretary of Labor within thirty (30) days after receipt of the Council's written decision. The appeal to the Secretary must be consistent with the requirements of the Workforce Innovation and Opportunity Act. The Secretary, after receiving a request for review and upon determining that the entity has met the burden of establishing that it was not accorded procedural rights under the appeal process established in the state plan, or that the area meets the requirements of Section 106(b) paragraph (2) or (3) and 20 CFR 679.250, as appropriate, may require that the area be designated as a local area. As part of this determination, the Secretary may consider comments submitted by the Council in response to the appeal.

Appeals made to the Secretary must be filed no later than 30 days after receipt of written notification of the denial from the Council, and must be submitted by certified mail, return receipt requested, to:

Secretary
U.S. Department of Labor
Attention: ASET
200 Constitution Ave NW
Washington, DC 20210

A copy of the appeal must also be simultaneously provided to the State Council, submitted to:

Workforce Development Council
317 West Main Street
Boise, Idaho 83735

The Secretary will notify the Governor and the appellant in writing of the Secretary's decision.

A one-stop partner may appeal its portion of funds required for one-stop infrastructure costs after determination by the Governor under the State infrastructure funding mechanism, consistent with §361.705(b).

The appeal must be made in writing to the Idaho Workforce Development Council within ten (10) business days of the Governor's determination. The appeal will be heard at the next Workforce Development Council meeting, provided there are at least 14 days before the next meeting. If the Council's regularly scheduled meeting is sooner than 14 days from the appeal submission, a special meeting of the Council, or a Committee designated by the Chair, shall be conducted within a 30-day period to accept or reject the appeal. The partner program entity shall have the opportunity to submit written and verbal information to the Workforce Development Council. The Council will issue a decision within 14 days of the Council appeal hearing. Its decision will be final.

Each partner may only appeal once per program year.

2. STATEWIDE ACTIVITIES

The Idaho Workforce Development Council, functioning as both Idaho's State and Local board, continually updates statewide and local operational policy for use by all WIOA service providers and may be found on the Idaho Department of Labor's (serving as the state's WIOA Administrative Entity) at the following link - ID State WIOA Program Policies. All statewide policies for Governance, WIOA Title IB, and One-Stop System reside on the Council's website via the following link - Idaho WDC Policies.(link)

The following policies, however, are currently under review and slated for revision based on updated USDOL guidance or process changes.

- Idaho Guidance for WIOA Adult Program Service Provision last updated July 14, 2016 **–** The update will incorporate most current WIOA 2022 Lower Living Standard Income Level (LLSIL) dated 4/6/2022. The current income levels, however, are in place for use by program staff.
- Idaho Policy for WIOA Eligible Training Providers Idaho Eligibility Criteria and Procedures Adopted 04-07-2020 **–** This policy needs to incorporate guidance from TEGL 08-19.
- Statewide Service Policies for WIOA Service Provision Updated October 25, 2017 **–** The youth incentive policies have been updated but are not contained within this bundle.
- WIOAP 01-21 - Management Information System and WIOAP 03-20 - National Dislocated Worker Policy – A reference to TEGL 22-15, which was cancelled in 5/12/16, was inadvertently left in both narratives and should be removed.
- WIOAP 01-20 - Change 1 - Measurable Skill Gains and WIOAB 12-19 – These are interchangeable guidance in which one contains a reference to TEGL 10-16 but should be updated to include "Change 1". Reference to each will also be incorporated.
- WIOAP 01-19 - Individual Service Strategy Policy – As with others listed, the reference to TEGL 21-16, should be updated to include "Change 1".

GOVERNOR'S FUND 15% SET-ASIDE PLANS

WIOA Title IB funds reserved for state level activities will be used to support the following:

- Rapid Response activities for dislocated workers;
- Disseminating by various means:
    - The State list of eligible providers of training for adults, dislocated workers and youth, including performance, tuition/fees and attendance cost information;
    - Information identifying eligible providers of work-based training opportunities;
    - Information on effective outreach and partnerships with business and service delivery strategies and promising practices to serve workers and job seekers;
    - Information of physical/programmatic accessibility for individuals with disabilities;
- Conducting evaluations;
- Providing technical assistance to local areas in carrying out state plan activities, including coordination and alignment of data systems in support of this Act;
- Assisting various entities provide opportunities for individuals with barriers to employment to enter in-demand industry sectors or occupations and nontraditional occupations, and the development of exemplary program activities.
- Assisting local areas for carrying out the regional planning and service delivery efforts;
- Assisting local areas by providing information on and support for the effective development, convening, and implementation of industry and sector partnerships;
- Providing technical assistance to local areas that fail to meet performance accountability measure;

- Carrying out monitoring and oversight of activities for services to youth, adults, and dislocated workers;
- Providing additional assistance to local areas that have a high concentration of eligible youth; and
- Operating a fiscal and management accountability information system.
- Support the state board as it implements workforce activities across the state.

Dissemination of Information

The State invests significant funds to meet this statutory requirement which includes: eligible providers, outreach, service delivery strategies, accessibility and workforce information. The state's eligible training provider performance reporting system will continue to receive investments to support eligible training providers and comply with increased regulations.

Assisting in the Operation of the One Stop System

The State invests a significant amount of state funds to assist in the support and operation of the One Stop system. This also includes staff development and technical assistance. To ensure more local funds are dedicated to service delivery, state funds are used to supplement the local planning process and other administrative and program activities.

High-Concentration of Eligible Youth

The State reserved funds to serve high concentrations of eligible youth needing assistance throughout the state. From PY18 through PY21, the state directed efforts to target enrollment of Hispanic and migrant and seasonal farmworker youth across the state. Funds are distributed based on areas demonstrating a need for additional monies.

Fiscal and Program Management

The State invests significant funds to pay for the costs of state administration and program functions such as monitoring, data validation and program assessments. This includes maintaining a fiscal reporting system as well as the annual subscription to America's Job Link for supporting the shared statewide MIS system and assisting with federal reports.

Rapid Response Activities

The Idaho Department of Labor's Workforce Administration Division serves as the state Dislocated Worker Unit with responsibility for the coordination of Rapid Response/ Dislocated Worker/TAA services within the department and other state and local community resources. The department's Rapid Response activities involve and are closely coordinated with the Workforce Services Division, Benefits Bureau, Research and Analysis Bureau, and American Job Center (AJC) locations. The department offers a comprehensive array of services including Title I-B, Wagner-Peyser, unemployment insurance, Trade Adjustment Assistance and veterans' services.

Rapid Response interventions, implemented by the department's Workforce Administration Division and coordinated with the local AJC locations, incorporate all these entities to ensure workers impacted by mass layoffs and closures are seamlessly transitioned to One-Stop activities. The department also coordinates with labor organizations in arranging services for dislocations involving organized labor. The East-Central Idaho Planning and Development Association in eastern Idaho also plays a significant role coordinating that area's local resources to meet the workforce needs of impacted workers. These and other program representatives constitute the state's Rapid Response Team.

Local AJC management and Title I-B provider staff are responsible for coordinating local workforce investment activities in conjunction with the state's Rapid Response efforts, including making WIOA Title I-B resources available to dislocated workers. The staff assists the state in promoting rapid response, early interventions services, and helps to develop response plans to worker dislocations. AJC staff also assists in coordinating services with local economic development efforts and the appropriate local elected officials. The extensive involvement of both AJC management and frontline staff in each early stage of Rapid Response intervention ensures that affected workers are seamlessly transitioned to One-Stop activities.

Employers covered by the Worker Adjustment and Retraining Notification Act (WARN) must submit a notice of plant closures and mass layoffs to the Idaho Department of Labor, which in turn distributes the information to the department's division administrators and state agencies participating in the One-Stop system. The Workforce Administration Division or local AJC management or staff will promptly initiate onsite contact with the employer and the appropriate employee representatives to implement the most effective re-employment activities including financial management, job search assistance and other workshops as requested. If appropriate, fully automated onsite re-employment centers may also be established and staffed. Career and training services are presented as viable options for the workers.

Promoting early intervention to worker dislocations allows the Rapid Response Team to develop the appropriate service delivery strategy for the impacted workers. The response takes into account the impacted workers' skills through individual assessment, their potential for direct job placement and the availability of resources to address their short and long-term needs. Services include onsite information meetings on available employment and training programs, employee surveys, aggressive promotion of services and coordination with training providers.

Each year, the state sets aside a portion of the Title I Dislocated Worker funds, up to 25 percent, to support Rapid Response activities across the state. The funds are first prioritized for supplementing local WIOA Title I services and will support career and training services for the employees of the company. The second priority for funding is to support services for smaller dislocations where the Dislocated Worker Unit and local AJC staff agree that it is appropriate for the local area to take the lead in organizing the response. Funds are available for local areas lacking resources to meet the demand for services. The balance of Rapid Response funds not required to support the above activities is allocated to local Dislocated Worker providers to supplement their area formula-fund allocations. These funds are allocated based on needs (support for carry-in participants and an increase in dislocations). Funds retained for Rapid Response activities at the state level may be allocated for an array of business services, including layoff aversion and other workforce development services to employers to assist and prevent potential layoffs or closures.

The Rapid Response Team also reviews and evaluates the potential for layoff prevention services. The goal of these efforts is to retain the business and to minimize downsizing. If appropriate, the team will present local economic development programs to identify layoff prevention options. These efforts include determining appropriateness of requesting assistance from the state's Workforce Development Training Fund.

The Idaho Department of Labor has years of experience providing Rapid Response services to the Idaho employer community. Its proven track record is evident by its exemplary performance. Department and Rapid Response staff take every opportunity to promote the full range of business services at each contact independent of the reason for that contact. This brings a comprehensive range of economic development, workforce development and education services to the attention of the businesses the department serves. Companies view these services as positive, proactive and business friendly.

The state's management information system, *IdahoWorks*, currently provides integrated participant, financial and management reporting for WIOA Dislocated Worker, National Dislocated Worker Grants (NDWG) and TAA program activity. Tracking Rapid Response team activities are also noted in *IdahoWorks*.

Idaho is a sparsely populated state covering a large geographic area, including millions of acres of federal land. Most natural disasters occur on federal land and displace few, if any, individuals and businesses. The Bureau of Land Management coordinates responses for those events affecting federal land; its responses include hiring trained fire crews or utility workers.

For the occasion of a natural disaster requiring assistance from FEMA or other entities, the Idaho Office of Emergency Management is responsible to coordinate the responses of Idaho's state agencies. In the incident of an emergency, including natural disasters, the Idaho Office of Emergency Management (IOEM) activates an Idaho Emergency Operations Center (IDEOC). Depending on the level of emergency, various levels of service are provided to the community. At all levels, as appropriate, the Idaho Department of Labor participates in the agency coordination to ensure critical functions are operating and assistance is available to those in need. These functions include Rapid Response and Disaster Unemployment.

The Idaho Department of Labor's Workforce Administration Division serves as the state Dislocated Worker Unit with responsibility for coordinating Rapid Response services around the state. In the event of an emergency requiring an Idaho Emergency Operations Center, the Idaho Rapid Response Coordinator will ensure that a service delivery team is assembled in the affected area and coordinated with the IDEOC.

Idaho's team for Rapid Response service delivery consists of various program staff from the local American Job Centers offering the full-range of one-stop services such as Employment Services, Unemployment Insurance, WIOA Title I-B Dislocated Worker, Trade Adjustment Assistance and Veterans services. The team may also include representatives from organized labor (if organized labor is affected) and East-Central Idaho Planning and Development Association when serving the East Central District (Service Delivery Area/Region 6).

The Rapid Response team is responsible for coordinating the local Rapid Response services and help develop a response plan for worker dislocations. The primary services provided by the Rapid Response team are WIOA Title I-B Dislocated Worker.

Disaster Unemployment is provided to individuals whose employment or self-employment has been lost or interrupted as a direct result of a major disaster. The program is activated in conjunction with a Presidential Declaration for Individual Assistance. After the FEMA declaration, state staff will prepare to submit a request for a National Dislocated Worker Emergency Grant within 15 days. After the initial provision of Rapid Response services under WIOA Title I, the state staff will consult the Rapid Response team for a recommendation to apply for a National Dislocated Worker Emergency Grant.

WIOA Dislocated Worker and Trade Adjustment programs are both administered through the One-Stop centers. Since the inception of WIA and continued on with WIOA, any means of cost sharing has been emphasized to increase the impact of limited funds. In Idaho, the state-level Rapid Response team includes staff from the dislocated worker, UI and TAA units. When notified of any closure or mass layoff, including those notifications received via Worker Adjustment and Retraining Notification (WARN), the team quickly broadens to include local delivery staff with expertise in provision of Rapid Response, Title I-B Dislocated Worker, UI, TAA and Wagner-Peyser services. This state-local team communicates with the employer and employee representatives, determines if Trade related, assesses initial community impact, identifies and includes other partners for rapid response assistance and develops integrated service delivery schedules to meet the needs of each individual employer and the impacted workers. Informational packets, which may include a survey to determine workers' interests

and to use towards the development of a National Dislocated Worker Grant, are distributed to the impacted workers at the Rapid Response event. Team members work closely with service provider management staff to develop a service delivery plan that coordinates resources and ensures One-Stop access to information and enrollment in UI, TAA, WIOA and Wagner-Peyser, many times at the job site prior to dislocation and the filing of a Trade petition. Idaho's Rapid Response delivery system provides the impacted worker with coordinated application and enrollment for WIOA, TAA and Wagner-Peyser services. Career assessments conducted by WIOA staff are accepted for the TAA program, eliminating client redundancies and streamlining co-enrollment processes. Rapid Response service delivery planning helps to ensure the majority of TAA recipients in Idaho are likely to be served with WIOA funds. Like the federal program, the state requires co-enrollment of TAA recipients whenever the individual is WIOA-eligible and receives WIOA staff or other supportive services.

One-Stop TAA staff in Idaho have the background and experience to provide a comprehensive One-Stop assessment through their work with WIOA, ES, UI and TAA programs. Through the collection and analysis of participant information, staff can determine the best mix of services necessary for a TAA participant to obtain employment. Information areas may include an applicant's needs, strengths, support systems, education, job skills, interests and career objectives and current work search activities. Information may be gathered informally, via interviews or observations, or formally via assessment tools such as aptitude tests, computer assisted programs and interest inventories. Utilizing this information, these state-merit staff have the tools to guide participants in their work search and career development plans, which includes the option for occupational training through fulfillment of the required six criteria as allowed under TAA. Completing assessment activities for TAA participants eventually helps them "navigate" access to the appropriate One-Stop programs and services, as well as other community services.

B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS

1. WORK-BASED TRAINING MODELS

On–the–job training (OJT) is training activity conducted by a private or public sector employer. This training occurs while the participant is engaged in productive work, learning the skills and information necessary for full and adequate performance on the job. OJTs are an attractive employer option for obtaining employees trained to their specifications, also helping the employees' acquisition of transferable skills to help them obtain employment later, should their current situation change. This effort also helps employers become more aware of the multitude of valuable resources offered by the state's One–Stop Centers. This activity allows businesses to rapidly adapt to changes in technology and the marketplace, making them capable of expanding and remaining competitive with affordable OJT options uniquely designed to achieve their specific developmental goals, especially for small businesses looking to expand. The activity targets all individuals (Dislocated Workers, Adults, and Youth) who are eligible for services under WIOA (including discretionary grants) and may benefit from the availability of OJT options.

OJT Training contracts are directed at employers who are able to provide occupational skill training and full–time employment that leads to self–sufficiency for the participant. Employers must agree first to hire and then to train eligible WIOA/TAA participants. A training payment is provided to the employer to compensate for the extraordinary costs of training; extraordinary costs are those associated with workplace training and additional supervision. This includes those costs the employer has in training participants who may not yet have the knowledge or skills to obtain the job through an employer's normal recruitment process.

The state emphasizes and coordinates learning–rich, work–based opportunities such as on–the–job training as a method to:

- Connect employers to the future workforce
- Expose participants, including youth, to quality employment opportunities, real–world experiences and to the skills (both technical and non–) required for success on the job.

In addition, OJTs

- Improve the state's capacity to promote demand–driven services and build relationships with businesses;
- Increase employment opportunities for harder to serve individuals, such as the long term unemployed, older workers, and those with limited or sporadic job histories;
- Increase opportunities for the One–Stop system to enhance relationships with businesses;
- Increase percentages of employers hiring and retaining a skilled workforce;
- Increase number and percentages of workers trained and hired;
- Elevate skill proficiencies for workers that will result in increased worker viability;
- Increase responsiveness to labor market issues in the private sector; and
- Increase flexibility at the local level to offer businesses training solutions tailored to respond to the specific needs of the business.

Because of the State's reduced WIOA funding levels, its current policy does not include utilizing customized training, incumbent worker training, nor transitional jobs under WIOA.

2. REGISTERED APPRENTICESHIP

Idaho's apprenticeship development team, composed of workforce, apprenticeship, education, and other key partners, was formed in 2016 to support strategies to integrate apprenticeship into statewide workforce systems. The state's efforts towards advancing Registered Apprenticeship (RA) in Idaho have shown significant positive results as its increased sponsorship levels 71% since FY2018 and increased the total number of apprentices 31% during that same time frame .

The Idaho Department of Labor's (IDOL) Registered Apprenticeship Unit is the state's primary organization which develops, writes, and submits RA standards for registration with USDOL-Office of Apprenticeship. IDOL's RA team guides sponsors through the Registered Apprenticeship Program (RAP) development process and serves as the only program providing technical assistance to sponsors through the sponsorship life-cycle and RAP expansion. Technical assistance offerings include Registered Apprenticeship Partners Information Database System (RAPIDS, for RA reporting) , IdahoWorks (the state's workforce management information system), job postings, mentor training, and EEOC. Supporting these efforts are the internally developed resources such as the online Apprenticeship Idaho Sponsor Success Guide, online Mentor Training System, and the innovative Sponsor Journey Map, a nationally recognized best practice by USDOL/Maher & Maher for state apprenticeship agencies which guides partners through the RAP development process.

Partnership and Alignment to Support Workforce System Integration

To strengthen the bond between apprenticeship and workforce development system, Registered Apprenticeship goals are strategically aligned with regional and statewide education and workforce development plans. IDOL is a founder of the newly formed Apprenticeship Idaho Coalition. Together with state's Workforce Development Council, Idaho Career Technical Education, AFL-CIO, Idaho Business for Education, Idaho Division of Vocational Rehabilitation,

and Idaho Department of Corrections, the coalition connects across individual grants to support overall system expansion. Coalition leaders work collaboratively to achieve increased growth, development, modernization, and diversification of RAPs across Idaho. Meeting biweekly, the coalition hosts training and technical assistance events for employers, sponsors, and related-training instruction (RTI) providers across the state.

As recipients of three distinct apprenticeship grants, IDOL plans to continue the state's focus on innovating and modernizing its RAP systems through expansion and development of the following projects:

- **Increase Career Ladders** in the Most In-Demand Occupations in Need of Skilled Labor –Challenged with needing additional support in creating RAPs for the lowest skilled workers, ApprenticeshipIdaho plans to create pre-set and customizable career ladder/career lattice models to help employers with the most in-demand occupations
- Develop a quality **framework for Pre-Apprenticeship Programs** leading to RAPs. – Research and design of a Pre-Apprenticeship Program, including curriculum development in areas of highest industry need, development a directory of Pre-Apprenticeship Programs and providers, and the potential development of a certification process.
- **Diversity, Equity & Inclusion** – A designated team placed strategically throughout the community, working alongside and embedded within organizations and state agencies representing under-represented populations. The team will liaise with employers to expand RAP opportunities and create Individualized Resource Teams (IRTs) to facilitate continued RAP development and talent pipeline connections.
- **Public Sector Apprenticeships** – A team of public agency representatives dedicated to the development of Registered Apprenticeship programs across state agencies.
- "Ready to Go" **RAPs with Online Customization System** – An online system will allow employers to choose the work process and RTI provider/outline per RAP, providing for customization when necessary.
- **Career Pathway Match-Making System** – This helps users create a pathway of existing options, from job shadowing, internship, pre-apprenticeship, and leading to RA within that career choice.
- **Third Party Credential Search** – A data system to house all apprentice certifications as they progress through related certifications, pre-apprenticeship and RA certifications.
- **K-12 National Apprenticeship Week curriculum** – Development of lesson plans, for teachers and counselors, to use for discussion and awareness of the different opportunities to career development and career readiness.
- Automate current **Talent Pipeline Referral System** to reduce lag time for apprentices qualified for inter-agency supportive services.
- **Unify Information Technology (IT) Systems** - Unify all state agencies working on RA projects under one single CRM system that monitors interactions with employers and allows partners to track the progress of RAPs throughout the development process. Integrating the current talent-pipeline referral system and providing more real-time follow-through with automated data triggering is also a proposed project outcome

Moving away from working a grant via a siloed approach has helped to improve the state's focus on integrating, business outreach and assistance with its partners across Idaho, ensuring identification and development of career pathways and industry-recognized credentials with each new RA developed. The state's workforce development system prioritized supporting its

key industries' growth and technological capabilities through the establishment of a trained workforce throughout Idaho. Through the cross training of workforce, education, community and business sectors, *ApprenticeshipIdaho* partners serve to improve the state's RA capacity, with many individual and employer customers benefitting from this "tag-teaming" of resources, which spur its continued success.

3. TRAINING PROVIDER ELIGIBILITY PROCEDURE

As noted in the ***Adult, Dislocated, and Youth Activities*** section, *a. General Requirements, 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,* Idaho's Policy for WIOA Eligible Training Providers Idaho Eligibility Criteria and Procedures (Adopted 04-07-2020) is one of several policies currently undergoing review and slated for revision. The new and revised policy will incorporate guidance from TEGL 08-19 and TEGL 08-19, Change 1 to address multiple items, including the incorporation of Registered Apprenticeship programs. In the meantime, the state is implementing the ETP processes/requirements as laid out in this state plan modification, alongside Idaho's existing policy. The narrative below outlines the state's current policy and process as it relates the eligible training providers in Idaho. Once the policy is updated and addresses its current areas of need, it will be incorporated in the next version of Idaho's Combined State Plan.

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The Workforce Innovation and Opportunity Act (WIOA) requires states to approve training providers before funds can be used to pay for occupational training. The Governor (via the Idaho Workforce Development Council) is charged with developing the process for determining how training providers may qualify for inclusion on Idaho's Eligible Training Provider List (ETPL). The Idaho Department of Labor (as the State Administrative Entity under WIOA) is responsible for implementing these procedures and maintaining the ETPL.

Previous to 2020, Idaho had requested a waiver from annual Eligible Provider Performance reporting requirements to include non-WIOA participants. The waiver helped to alleviate some of the hardship the State has faced in moving toward compliance in trying to implement the WIOA ETP requirements, like so many other states across the country. However, the State did collect full data sets for PY19 and PY20 and provided performance reports to USDOL. For both program years, there continue to be significant inadequacies in the reporting of social security numbers for non-WIOA participants. The Workforce Development Council has been unable to use the data to set performance metrics for continued eligibility and thus the ETP Policy has not yet been fully updated to shift away from alternate criteria. The Workforce Development Council, State Board of Education and Idaho Department of Labor are working with the Idaho Transportation Department to establish a data sharing agreement that will enable participants without social security numbers to be matched against drivers license data to access the SSN.

The Workforce Development Council would like to share that Idaho's providers are increasingly reluctant to stay on the ETP due to the requirement to provide social security numbers for students. Educational entities do not collect this information and while they have made good efforts to do so, they have been communicating with the Executive Director intentions to not renew. As Idaho has few training providers to start with, this may cause the Workforce Development Council to direct all WIOA training funds to on-the-job training and utilize a state program (www.idaholaunch.com) for short-term skills training. We are concerned about the impact on the measurable skills gain performance metric if non-WIOA funded training cannot be used to meet MSG.

WIOA Eligible Training Providers

Idaho Eligibility Criteria and Procedures

Adopted 04-07-2020

The text below includes the policy itself along with screenshots from the system that providers are directed to apply in to confirm that all criteria are collected in alignment with WIOA statute.

Eligible Providers of Training Services -

Subject to meeting federal and state eligibility criteria, WIOA eligible training providers may include:

- Post-secondary education institutions;
- Other public or private providers of training, which may include joint labor-management organizations and eligible providers of adult education and literacy activities under WIOA title II if such activities are provided in combination with occupational skills training; and
- Community Based Organizations (CBOs) or private organizations of demonstrated effectiveness that provide training under contract with the Idaho Workforce Development Council.

U.S. Department of Labor Registered Apprenticeship programs are automatically eligible training providers under WIOA without regard to federal or state eligibility criteria. The Idaho Department of Labor reaches out to RA programs on an annual basis to determine if the programs would like to opt in to participate in the program. If an RA program opts for inclusion, they may complete the program information in IdahoWorks and are then automatically approved without applying any other eligibility criteria described below.

Eligible Programs of Training Services

The Eligible Training Provider List is composed of eligible training programs. Both training providers and their individual programs must meet eligibility standards. A program of training services is defined as one or more courses or classes, or a structured regimen that directly leads to employment in an in- demand occupation. The training must lead to:

- a recognized postsecondary credential,
- a secondary school diploma or its equivalent, or
- a distinct measurable skill gain toward such a credential or employment.

These training services may be delivered in person, on-line, or in a blended approach; however, the training provider must provide physical facilities and/or tools to provide a high-quality experience in meeting instructional and skills assessment needs.

Training Service Exceptions to Eligible Training Provider List

Training services that are not subject to the requirements of the eligible training provider provisions are:

- On-the-job training; customized training; incumbent worker training; transitional employment; or
- The circumstances described at WIOA sec. 134(c)(3)(G)(ii), where the Workforce Development Council determines that:
    - There are insufficient providers, or
    - There is a training services program with demonstrated effectiveness offered in the local area by a community-based organization or other private organization to serve individuals with barriers to employment, or

- It would be most appropriate to award a contract to an institution of higher education or other eligible provider of training services in order to facilitate the training of multiple individuals in in-demand industry sectors or occupations, and such contract does not limit customer choice.

Note: The Eligible Training Provider List is used only to provide occupational skills training services. Basic skills training, "soft" skills training, or other workforce preparation activities do not train individuals for a particular occupation. Additionally, the following are not considered occupational skills training:

- *Workshops or seminars provided by organizations not registered with the Idaho State Board of per year are not considered occupational skills training*
- *Intensive review courses as instruction for test preparation*
- *Continuing education courses for those with existing occupational skills*
- *Short-term certificates that are only one component of the typical requirements for a job such as CPR, OSHA, WorkKeys, Food Handler Certificates, and basic computer training.*

As part of a WIOA participant's individualized employment plan, career planners may pay for these activities as career services separate from or in addition to occupational skills training.

Types of Eligibility

WIOA provides for *Initial Eligibility* and *Continued Eligibility*. Initial eligibility is for new programs who upon approval receive eligibility for one year. Continued Eligibility is for a biennial (every other year) review and renewal of programs having completed initial eligibility.

Note: The criteria provided below for both initial and continued eligibility are still considered alternate criteria in Idaho. The state is currently collecting data that will allow the transition to be finalized as the state anticipates setting thresholds for factors related to WIOA performance indicators.

Alternate Criteria for WIOA Eligible Training Providers Initial Eligibility

Institution Criteria:

- Provide a certificate of registration or letter of exemption from the Office of the State Board of Education or other oversight body such as the Bureau of Occupational Licensing authorizing the entity to provide training and collect tuition in the State of Idaho.
- Provide the required institution specific data elements in IdahoWorks as directed by the Idaho Department of Labor.

Note -These data elements include all of the required criteria listed in Attachment III of TEGL 8-19. See examples of screenshots below.

- Successfully complete Equal Opportunity desk review survey located here: https://www.labor.idaho.gov/WIOA/WIOA-EO-Desk-Survey.pdf
- Sign agreement to securely collect and report required information for programs.

Program Criteria:

- Program of training leads to a high-growth/high-demand occupation listed in Appendix A. WIOA participants will be encouraged to select training for an occupation that pays at least $12 per hour. *Note: Appendix A is updated*

annually in July by the Workforce Development Policy Committee of the Idaho Workforce Development Council.

- Program of training provides a high-quality experience*, including leading to a recognized postsecondary credential or demonstrate a measurable skills gain toward such a credential or employment. *Note: WIOA participants will be encouraged to select high quality training that leads to an industry- recognized postsecondary credential and is available free of charge or at low cost to participants.*

*High quality training experience may be identified by:
-Physical facilities and/or tools appropriate to meet instructional and skills assessment needs; -Reportable skills gain measured by assessments;
-Industry endorsement;
-Not having a high dropout rate and/or high student loan default rate and/or poor job placement rate; and -Preferably has regional or national accreditation.

- Provide the required program specific data elements in IdahoWorks as directed by the Idaho Department of Labor. *Note -These data elements include all of the required criteria listed in Attachment III of TEGL 8-19. See examples of screenshots below.*

- Providing a Program Synopsis, which is a brief description of the training program no more than 5,000 characters.

- Information regarding WIOA performance indicators. (*See screenshot from guidance manual for providers below)*; and

Program Performance	
Begin Date	Enter the program begin date or
End Date	Enter the program end date in mm / dd/ yyyy format
Number Participated	Number of students participated/enrolled in the program
Number Completed	Enter number of students who completed the program.
Completed Percent	Display
Number Employed After Leaving the Program	(*Text*) Example: Idaho Office of the State Board of Education.
Employed Percent	Display
Median Hourly Wage at Placement	(*Text*) Example: Idaho Bureau of Occupational Licenses for Barber and Cosmetology Services Licensing Board.

- Information regarding the provider's relationship with businesses. (*Screenshot from guidance manual for providers).*

✓Are you in any partnership(s) with business?	(*Drop-down*) Select Yes or No.

Exceptions

- U.S. Department of Labor Registered Apprenticeship (RA) Programs - Upon request from the RA program sponsor, programs are automatically placed on the Eligible Training Provider list. RA programs are encouraged to comply with the ETP procedural requirements, especially providing information for performance reporting; however, they are not required to do so.

- Public Postsecondary Academic Programs - Academic programs provided by Idaho's public colleges and universities will be approved for initial eligibility under WIOA. These programs will be added to the ETP list upon request of a WIOA career planner and

confirmed by the Idaho State Board of Education. *Note* – *These programs are subject to the State Board of Education's requirements which meet initial eligibility requirements when aligned to an in-demand occupation. If their information is not already in IdahoWorks, the career planner and/or administrative entity representative works with them to ensure all the required information is entered before issuing a voucher.*

- Out-of-State Providers – Out-of-state providers must be on their respective state's WIOA eligible training provider list. A reciprocal agreement must be signed with the respective state's ETP administrator or appropriate signatory.

Initial eligibility will expire 1 year from date of approval.

Continued Eligibility

A training provider may have their eligibility continued by meeting the following:

- Provide evidence that the Institution Criteria described in the Initial Eligibility section above continue to be met.
- Provider has submitted the required WIOA performance data (*See screenshot above*) and cost information in a timely manner, in accordance with the annual deadlines set by the Idaho Department of Labor. *Note – This includes updating their program information in IdahoWorks in addition to submitting performance data as outlined in the data sharing agreement.*

Examples include:

-Addressing access to training services throughout Idaho, and

✓Training Services Delivered By: (check all that apply)	(*Checkboxes*) Check all that apply: • Online with a browser • Directly on a computer • Onsite at our location

-The ability to provide physically and programmatically accessible trainings as noted in the screenshot below.

✓Do you provide access to training for individuals who are employed?	(*Drop-down*) Select Yes or No.
✓Do you provide access to training for individuals with barriers to employment?	(*Drop-down*) Select Yes or No.

- The occupation(s) the provider's training program(s) are aligned to continue to be included on the list provided in Appendix A, which is updated annually.

Programs that were exempt from Initial Eligibility criteria:

- US Department of Labor Registered Apprenticeship (RA) programs are not subject to Continued Eligibility and will continue to remain on the Eligible Training Provider list until the sponsor requests to be removed. RA programs are encouraged to comply with the state's ETP requirements, especially providing information for performance reporting; however, they are not required to do so.
- Public Postsecondary Academic Programs will be removed from the Eligible Training Provider list if a WIOA participant has not been enrolled in the training in the past 12

months. These programs can be added back to the list per the Initial Eligibility criteria above on an as-needed basis.

- Out-of-State Providers will be independently verified against the respective state's ETP list.

Denial or Termination of Eligible Training Provider State

Note – The reasons listed below are what the state considers to be a substantial violation of the policy.

A training provider or program may be denied initial or continued eligibility for the following reasons:

1. Required information was not provided correctly or in a timely manner.
2. The training program does not support the occupations in demand in Idaho and/or does not meet minimum entry-level wage criteria.
3. The training program does not meet the WIOA definition of training services, which is a program of one or more courses or classes or a structured regimen that directly leads to employment in an in-demand occupation. The training must lead to:
    a. a recognized postsecondary credential,
    b. a secondary school diploma or its equivalent, or
    c. a distinct measurable skill gain toward such a credential or employment.
4. The training program does not provide a high-quality educational experience in meeting instructional and assessment needs. (Could be evidenced by lack of regional or national accreditation, lack of industry endorsement, lack of skills gain measured by assessments, lack of job placement, a high dropout rate and/or high student loan default rate)
5. The training provider has not maintained required licenses and certifications or is found to be noncompliant with the training provider's assurances or certifications.
6. The training provider does not comply with the WIOA regulations, or any agreement executed under the WIOA.

Providers who apply will be notified if the provider does not meet the compliance standards. Each provider will be notified of the status of each requested program.

Formal Hearing-Appeal

A training provider whose program is denied from the ETP or is deemed ineligible, has the option to submit a written or email appeal to Idaho Department of Labor within 14 business days after receiving notification. The request for appeal must include the following: name of training provider, training program(s) impacted, the reason for the appeal (i.e. grounds), training provider point of contact phone and email, and signature of training provider representative.

Written appeals can be mailed to:

Appeals Bureau, Idaho Department of Labor, 317 W. Main Street, Boise, ID 83705-0720

Or Faxed to:208-334-6440

Appeals can also be emailed to: WIOAETP@labor.idaho.gov

Regardless of delivery method, the appeal must be postmarked or sent by 5 p.m. on the last day to protest.

As a result of filing an appeal, a telephone hearing may be scheduled in which all interested parties will be invited to participate. The hearing shall include an opportunity for the applicant to submit written and verbal information to the presiding entity. This will be your only opportunity to appeal this issue. If no appeal is filed, this determination will become final and cannot be changed. If you have questions about this determination or about filing an appeal, please contact the ETP Program Specialist by email at WIOAETP@labor.idaho.gov.

The presiding entity will issue a decision within 60 calendar days from the date the hearing takes place. The decision of the presiding entity shall be final.

APPENDIX A - Idaho Occupations in Demand – Amended 4/19/2022
Appendix A is updated annually by the Workforce Development Policy Committee in July.

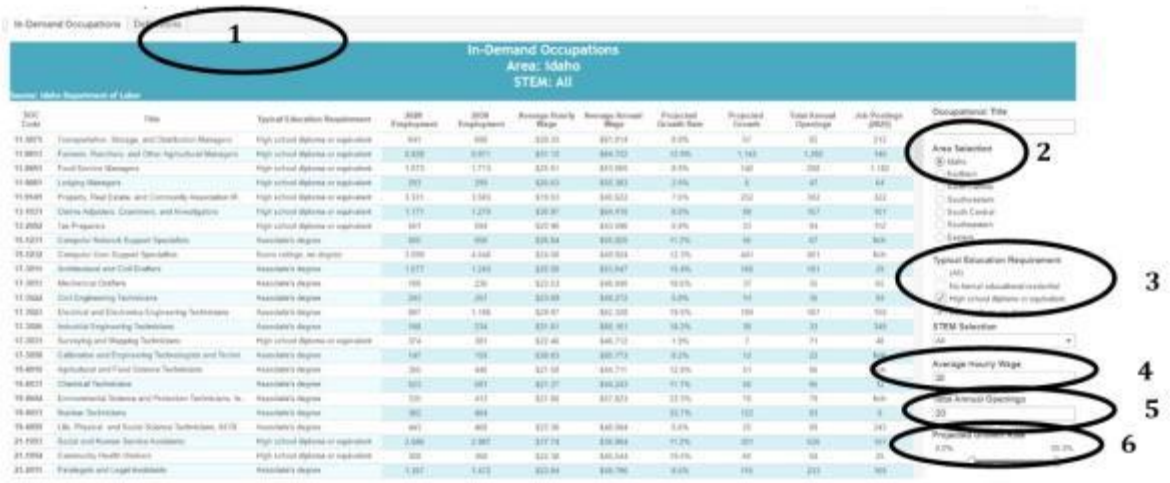
Methodology

The Idaho Department of Labor's labor market information unit has developed a dynamic web tool that uses quantifiable information to identify in-demand occupations and is augmented with projected growth and total annual openings (based on both projections and real-time job postings), wage information and education and training requirements. The list can be filtered by sub-region of the state, typical education requirement and STEM designation.

This list may be found online at: https://lmi.idaho.gov/occupations-in-demand

To be included on the Eligible Training Provider List, programs of training must lead to one or more of the occupations when the following filters have been applied:

1. The tab must be set to "In-Demand Occupations".
2. The "Area Selection" should be set to the region where the training is being provided.
3. The "Typical Education Requirement" should be set such that "No formal educational credential, Bachelor's degree, Master's degree, and Doctoral or professional degree" are not selected.
4. The "Average Hourly Wage" must be set to $12 per hour.
5. The "Total Annual Openings" must be set to 20.
6. The "Projected Growth Rate" must be set to 0 or higher.



The following "career pathway" programs are approved statewide regardless of where they appear on the regional lists:

- Certified Nurse Assistant
- Related training for Electrical, Plumbing and HVAC apprenticeship programs
- Registered Nurse
- Massage Therapy
- Software Developer

A training provider may request review, by the Policy Committee, if the occupation their program prepares individuals for fall outside this policy. They must provide a compelling case as to why the program should be added based on documented demand for individuals with the skills and certifications delivered through the program. The Policy Committee will review the request against available real-time labor market information and make a determination. If approved, the Policy Committee will provide a letter stating such to be attached to the application. If denied, no further recourse is available.

The request must be sent (electronically or by mail) to the Executive Director of the Workforce Development Council at the address found on www.wdc.idaho.gov. Requests that are received 7 or more days prior to the next regularly scheduled Policy Committee meeting will be reviewed at that meeting. If there are fewer than 7 days until the next meeting, it will be reviewed at the following meeting.

The request should include the following information:

- Name of Provider
- Brief Description of Program
- Documented demand for the program by local employers (i.e. letters stating that employers hire from the program, information from the Idaho Occupations In-Demand tool that shows regional demand, other cited data sources that show demand for the occupation). Information provided must be clear, concise and compelling.

The Policy Committee will consider the following, at a minimum, in making a determination:

- Real-time labor market analysis of the occupation through tools such as Help Wanted Online, Burning Glass Labor Insight, EMSI Analyst.
- Regional wage data.
- Whether the occupation is part of a career pathway that leads to additional in-demand, high wage occupations.

If the Policy Committee approves the request, the occupation will be added to the list of additional statewide occupations above.

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

The Idaho policy for adult program eligibility and priority is located here **(link): The excerpt for adult priority of service for individualized career and training services follows:**

Priority Groups

1. Veterans and eligible spouses receive priority service for all Department of Labor-funded training programs, including WIOA programs.
2. Individuals receiving public assistance, other low-income adults, and individuals who are basic skills deficient have statutory priority service for individualized career and training services under the Adult program.

Order for Priority of Service for Individualized Career Services and Training Services

1. Veterans and eligible spouses who are recipients of public assistance, low income or basic skills deficient.
2. Other individuals who are recipients of public assistance, low income or basic skills deficient.
3. Veterans and eligible spouses who are not recipients of public assistance, low income or basic skills deficient.
4. Other individuals who are not recipients of public assistance, low income or basic skills deficient, but have a potential barrier to employment as defined by WIOA:
    a. Displaced Homemakers
    b. English Language Learners, Low Levels of Literacy, Cultural Barriers
    c. Exhausting TANF within 2 years
    d. Ex-offenders
    e. Homeless individuals/runaway youth
    f. Long-term unemployed
    g. Migrant and Seasonal Farmworkers
    h. Persons with Disabilities (including youth)
    i. Single Parents (Including single pregnant women)
    j. Youth in foster care or aged out of system
    k. Individuals within an under-represented demographic, such as sex, race, or ethnicity;
5. Other individuals within these recognized groups:
    a. Individuals within an under-represented demographic, such as sex, race, or ethnicity.
    b. Individuals referred by other one-stop partner programs.
    c. Individuals residing in rural counties.
6. Any other eligible individual determined to be appropriate for services or training to obtain or retain employment.

Low Income Eligibility:

Idaho uses 70% Lower Level Standard Income Level to determine eligibility for low income WIOA participants under WIOA §(3)(35)(ii).

Monitoring Adult Program Priority

The administrative entity collects quarterly data to ensure program and state compliance for WIOA priority of service of Title IB enrollments.

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

Local workforce areas, with the approval of the Governor, may transfer up to 100 percent of the Adult Activities funds for expenditure on Dislocated Worker Activities, and up to 100 percent of Dislocated Worker Activities funds for expenditure on Adult Activities.

The WDC reserves the right to adjust the funds distributed to Service Delivery Areas, within a single Local Area, in or around December and March of each program year. Adjustments will be made based on an SDA's enrollment and expenditure levels compared to the planned levels within their annual agreement. Enrollment or expenditures 10 percent under planned levels will trigger the WDC to consider adjustments. The WDC will consult with the Administrative Entity and service provider to address participant needs and prevent underspending before shifting funds.

C. WITH RESPECT TO YOUTH WORKFORCE INVESTMENT ACTIVITIES AUTHORIZED IN SECTION 129 OF WIOA—

1. IDENTIFY THE STATE-DEVELOPED CRITERIA TO BE USED BY LOCAL BOARDS IN AWARDING GRANTS OR CONTRACTS FOR YOUTH WORKFORCE INVESTMENT ACTIVITIES AND DESCRIBE HOW THE LOCAL BOARDS WILL TAKE INTO CONSIDERATION THE ABILITY OF THE PROVIDERS TO MEET PERFORMANCE ACCOUNTABILITY MEASURES BASED ON PRIMARY INDICATORS OF PERFORMANCE FOR THE YOUTH PROGRAM AS DESCRIBED IN SECTION 116(B)(2)(A)(II) OF WIOA IN AWARDING SUCH GRANTS OR CONTRACTS.[11]

As allowed in WIOA §681.400, the Idaho Department of Labor, as the state's grant recipient/fiscal agent, has exercised its option to provide youth workforce investment activities. All intake, assessment, completion of individual service strategies, case management and follow-up services are provided within the One-Stop offices by Idaho Department of Labor staff.

Outcomes

Compliance with federal performance guidelines, which provide specific levels of performance for WIOA program outcomes, is critical. Performance indicators may be added or revised to meet federal and state requirements.

a. Percentage of participants who are in education or training activities, or in unsubsidized employment, during the second quarter after exit from the project.

b. Percentage of participants in education or training activities, or in unsubsidized employment, during the fourth quarter after exit from the project.

c. Median earnings of participants who are in unsubsidized employment during the second quarter after exit from the project.

d. Percentage of program participants 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.

e. Percentage of program participants in an education or training program that led to a recognized postsecondary credential or employment and achieved a measurable skill gain, noting progress towards such a credential or employment.

d. Effectiveness in serving employers.

2. DESCRIBE THE STRATEGIES THE STATE WILL USE TO ACHIEVE IMPROVED OUTCOMES FOR OUT-OF-SCHOOL YOUTH AS DESCRIBED IN 129(A)(1)(B), INCLUDING HOW IT WILL LEVERAGE AND ALIGN THE CORE PROGRAMS, ANY COMBINED STATE PLAN PARTNER PROGRAMS INCLUDED IN THIS PLAN, REQUIRED AND OPTIONAL ONE-STOP PARTNER PROGRAMS, AND ANY OTHER RESOURCES AVAILABLE.

Connecting with Youth remains a major emphasis among the State's Combined State Plan partners. Despite the resurgence in the economy since the peak of the pandemic, young people, as a broad group, still appear at a disadvantage in terms of finding employment. This disadvantage is compounded when applied to persons with additional barriers to employment such as being an out-of-school youth.

Since PY2016, the state's Title I Youth program has directed 100% of program funds towards out-of-school youth. Program staff across the state have exclusively targeted their outreach efforts to this population since then, boosted by the Workforce Development Council's directive to focus PY2016 Youth in Need funds be specifically applied towards outreach efforts to out-of-school youth with barriers to employment so these youth understand what services are available to them.

However, later in PY21, the council will allow the six Service Delivery Areas across the state to enroll in-school youth in their individual Summer Youth Work Experience projects designed to boost youth employment opportunities. WIOA-eligible in-school youth will only be allowed to participate in this project – the state's emphasis on serving out-of-school youth will not change with this slight modification. Project staff will have undergone training on how to work with in-school youth so as not miss any opportunities to serve youth who may benefit from this project.
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A workforce goal identified by the Idaho Workforce Development Council (Section 11(b)(2)(A)) is "Improve the effectiveness, quality, and coordination of programs and services designed to maintain a highly skilled workforce." Beneath this goal are several strategies specifically designed to target the improvement of out-of-school youth outcomes, including:

A) Create, align, and sustain partnerships with stakeholders to implement workforce development programs.
B) Support development in work-based learning, and innovative programs to drive Idaho's present and future workforce solutions.
C) Leverage existing local employer-focused initiatives to build and support effective pathways to connect Idahoans to careers.
D) Cultivate a high-quality One-Stop Career System that connects employers and workers and facilitates access to workforce services, education services, and information.

Out-of-school and disconnected youth specifically benefit from expanded alternative learning modalities and training opportunities developed within Idaho's education and workforce systems. These may include work-based learning, apprenticeships, distance education, and compressed scheduling. The state's Title II programs connect participants, including those age 16-24, to career pathways through contextualized education in reading, writing, math and the English language, as well as integrated education and training, and transition into training by utilizing the previously noted modalities. This strategy will improve outcomes for out-of-school youth who may not benefit from or have access to traditional modes of education.

The State workforce partners are enacting more focused efforts around specific youth with barriers, including out-of-school youth, youth with disabilities, and low-skilled youth. The Workforce Development Council has identified the following groups with barriers to employment to receive priority service under the WIOA Title I Youth program for out-of-school youth:

- low-income youth involved with the juvenile justice system;
- low-income youth exiting foster care;
- low-income youth that are pregnant and/or parenting; and
- low-income youth with disabilities.

The Council's prioritization of out-of-school youth with disabilities for the WIOA Title I youth program serves as a counterpart to Title IV's requirement to emphasize pre-employment transition services to (in-school) students with disabilities. The alignment of WIOA core programs to maximize service through limited resources continues to improve outcomes for both in-school and out-of-school youth with disabilities throughout the state.

Additionally, the Workforce Development Council has continued with its implementation of an incentives policy to encourage youth achievement. The council will be reviewing and updating the policy the determine if additional incentives may be incorporated as part of the state's offerings. The current policy follows on the next page.

WIOA Youth Program Incentives

Purpose: Revise Youth Program Incentives to comply with WIOA.

WIOA allows for incentive payments to be made to youth participants, provided the incentives are:

(a) Tied to the goals of the specific program;
(b) Outlined in writing before the commencement of the program that may provide incentive payments;
(c) Aligned with the local program's organizational policies; and
(d) Issued in accordance with the requirements contained in 2 CFR part 200.

WIOA-funded youth incentives must be connected to recognition of achievement of milestones in the program tied to work experience, education or training provided it is made a part of the participant's individualized assessment and service strategy. It should be noted that WIOA funds may not be used for incentives for recruitment and eligibility documentation.

This policy and incentive options align with the Workforce Development Council's directive to focus 100 percent of WIOA Youth funding on Out-of-School Youth, as well as WIOA's Youth program outcomes - remediation of basic skills, attainment of HS/GED, gaining industry-recognized skills and credentials that will lead to in-demand, self-sustaining employment.

Limitations on Incentives:

WIOA regulations allow provision of incentives to youth during enrollment in the WIOA Youth program or during the youth's 12-month follow-up time period after completion of the program. Achievements completed prior to WIOA enrollment do not qualify for incentives. WIOA youth program incentives are not intended for use as emergency assistance, but rather as a tool to encourage ongoing participation and attainment of specific program goals. WIOA Youth in need of emergency assistance must be connected to an appropriate service provider.

1) Requirements for Youth:

a) Active in WIOA Youth program *or* follow up activity; b) In collaboration with a career planner, has developed an Individual Service Strategy (ISS) delineating training and employment goals. Follow-up incentives are established to only help complete predetermined program goals.

2) Incentive Documentation:

a) Description of achievement to qualify for specified incentive award is documented in case file and *IdahoWorks* management information system as part of the Individual's Service Strategy (ISS) and WIOA career planner intervention in accomplishing the established goals leading to the incentive;

b) Supporting documentation of attainment prior to issuance of incentive award (copy of credential/test scores/grades, employer evaluations, attendance record, etc.) retained in case file.

3) Incentive Options:

a) *Credential Attainment* – Attainment of a recognized postsecondary credential or secondary school diploma during WIOA Youth program participation or during the 12-month follow-up period;

b) *Measurable Skill Gain* – Attainment of a WIOA skill gain as defined by USDOL for program reporting:

i) Achievement of at least one educational functioning level, if receiving instruction below postsecondary education level

ii) Attainment of secondary school diploma or equivalent;

iii) Secondary or postsecondary transcript for sufficient number of credit hours

(1) **Secondary:** transcript or report card for 1 semester, or

(2) **Postsecondary:**at least 12 hours per semester or, for part-time students, a total of at least 12 hours over 2 completed consecutive semesters

iv) Satisfactory progress report toward established skill-based milestone from an employer or training provider;

v) Passage of an exam required for an occupation or progress attaining technical/occupational skills as evidenced by trade-related benchmarks.

c) *Employment and Retention* – Attainment of fulltime employment in the youth's selected occupation/industry as reflected in the ISS; 6-month retention with the same occupation/employer.

4) WIOA Youth program participants may only participate in one incentive option during a program year.

5) Incentives during follow-up may only assist with completion towards predetermined program goals.

Idaho WIOA Youth Incentive Options

A. A progressive, job retention incentive for youth who have successfully completed all their WIOA Youth program services and attained full–time, unsubsidized employment in the individual's selected career/industry as planned in the WIOA ISS. Verification of employment and retention by the career planner are required for reimbursement.

a. $200 for obtaining employment.

b. $300 for retaining the same position/employer for 6 months.

B. A $150 skill attainment incentive that allows a youth in a work-based activity (OJT, Internship or Work Experience) who can demonstrably show a measurable skill gain verified by the employer/worksite, based upon a positive employer evaluation which enumerates the skill obtained. The evaluations are incorporated as part of the overall process to show the participant's progress, either at the mid-point of the work-based activity or at the end of the

activity, based upon the participant's goal as established in each activity's Memorandum of Agreement with the worksite/ employer.;

C. $150 incentive for each GED section (a total of four) passed during participation in the WIOA Youth Program or during the 12-month follow-up period. Career planners will be allowed the flexibility to provide the GED incentive individually as each test is passed, or cumulatively once the GED is obtained; OR

$100 Incentive for secondary or postsecondary transcript for sufficient number of credit hours.

a. **Secondary:** transcript or report card for 1 semester, or

b. **Postsecondary:** at least 12 hours per semester or, for part-time students, a total of at least 12 hours over 2 completed consecutive semesters

D. $300 incentive for a youth's successful completion of a WEX/Internship - all activities required for participation. This includes pre- and post-orientations, workshops, fulfilling WEX requirements, meeting all established program expectations, and positive successful employer evaluation report(s).

E. $100 Perfect Attendance incentive for youth participating in any work-based learning activity. Youth must have:

a. No unexcused absences.

b. No more than a single tardy of less than 15 minutes.

c. Includes attendance at any required pre-/post-work orientations/job search workshop.

F. $250 incentive for each area - literacy and numeracy - in which a basic skills deficient participant demonstrates an increase of one or more educational functioning levels based on pre- and post-test scores, utilizing any of the assessments recognized by the National Reporting System for Adult Education programs, including the TABE (Test of Adult Basic Education), Casas, etc. The same assessment instrument must be used for pre- and post-tests.

G. $400 incentive for successful passage of an exam required for employment in a particular occupation, or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks, such as knowledge-based exams which lead to a credential. These may include items such as a welding test or passage of the NNAAP (National Nurse Aide Assessment Program). Exams for general skills, such as a typing test, do not qualify for the incentive.

H. $400 incentive for obtaining a recognized postsecondary credential, OR a secondary school diploma or its recognized equivalent. The post-secondary credential must reflect attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation based on standards developed or endorsed by employers or industry associations. Certificates must recognize skills specific to the industry/occupation rather than general skills related to safety, hygiene, etc., which excludes credentials such as CPR, OSHA Health and Safety, flagging certification and other similar certifications. Listed below are examples of credentials eligible for this incentive:

a. Secondary School diploma or recognized equivalent

b. Associate's degree

c. Bachelor's degree

d. Occupational licensure

e. Occupational certificate, including Registered Apprenticeship and Career and Technical Education educational certificates

f. Occupational certification

Below is a list of the types of organizations and institutions that award recognized postsecondary credentials. Please note that not all credentials awarded by these entities meet the definition of recognized postsecondary credential.

- A State educational agency or a State agency responsible for administering vocational and technical education within a State;
- An institution of higher education, which includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in Federal student financial aid programs;
- An institution of higher education that is formally controlled, or has been formally sanctioned or chartered, by the governing body of an Indian tribe or tribes.
- A professional, industry, or employer organization or product manufacturer or developer (e.g., recognized Microsoft Information Technology certificates, such as Microsoft Certified IT Professional (MCITP), Certified Novell Engineer, etc.) using a valid and reliable assessment of an individual's knowledge, skills and abilities;
- USDOL Federal Office of Apprenticeship;
- A public regulatory agency, which awards a credential upon an individual's fulfillment of educational, work experience or skill requirements that are legally necessary for an individual to use an occupational or professional title or to practice an occupation or profession (e.g., Federal Aviation Administration aviation mechanic's license, or a State-licensed asbestos inspector);
- A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans and other eligible persons.
- Job Corps, which issues certificates for completing career training programs that are based on industry skills standards and certification requirements.

3. DESCRIBE HOW THE STATE WILL ENSURE THAT ALL 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2) ARE MADE AVAILABLE AND EFFECTIVELY IMPLEMENTED, INCLUDING QUALITY PRE-APPRENTICESHIP PROGRAMS UNDER THE WORK EXPERIENCE PROGRAM ELEMENT. [12]

The Idaho Department of Labor has been designated as the state's comprehensive WIOA Youth program service provider as allowed under the provisions of the Workforce Innovation and Opportunity Act's Final Rule at 681.400. This section clarified that the competitive procurement provision discussed in the Act (Sec. 123) is only applicable if the local board (please note, Idaho's Workforce Development Council functions as both a state and local board) chooses to award grants or contracts to youth program element service providers other than the grant recipient/fiscal agent.

As the grant recipient, the Idaho Department of Labor is not only eligible to provide service elements under this provision, but also eligible to provide the design framework component of the youth program. The design framework includes intake, assessment, development of an individual's service plan and overall case management - these will determine whether occupational skills are required by the youth, negating the need for procuring the element. In Idaho, the grant recipient/fiscal agent -the Idaho Department of Labor - will provide youth design framework services.

Extensive surveys and communication with youth service providers found that the WIOA youth elements found to be commonly available in local service areas for youth tutoring, alternative school, education concurrent w/work prep, guidance and counseling, financial literacy

education, entrepreneurial skills, labor market information and transition activities will be *coordinated* with other providers in the communities, rather than purchased with WIOA funds.

As the comprehensive youth program provider, the Idaho Department of Labor Workforce Division staff provide both the design framework and element services. Its career planners provide access and/or referral to any of the elements most appropriate for the eligible youth. The Idaho Department of Labor service providers require a program design which includes the 14 required youth elements with an emphasis on the following:

- activities leading to the attainment of a secondary school diploma or its recognized equivalent, or a recognized postsecondary credential;
- preparation for postsecondary educational and training opportunities;
- strong linkages between academic instruction and occupational education that lead to the attainment of recognized postsecondary credentials; and
- preparation for unsubsidized employment opportunities (which includes access to apprenticeship prospects and multiple options for work experience) ; and
- effective connections to employers, in in-demand industry sectors and occupations of the local and regional labor markets.

To ensure the framework services are effectively implemented, the Idaho Department of Labor has established expectations for objective assessments, individual service strategy and other career planning and follow-up services for youth.

To ensure that youth receive the elements found to be commonly available in local service areas, the providers have developed linkages with the public, private and non-profit service providers of these elements. These linkages include arrangements which ensures a regular exchange of information relating to the progress, problems and needs of participants.

Performance of these service providers are monitored regularly to ensure program integrity, including their progress toward the achievement of goals, objectives, expenditure rates, service levels, and other process and outcome measures.

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.

The state Workforce Development Council approved the following criteria for youth requiring additional assistance, which was initially recommended by the state's Youth Subcommittee.

<u>The WIOA Definition for Youth Needing Additional Assistance (Out-of-school Youth):</u>

Low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment:

A) Has been treated by a professional for mental health issues including traumatic events, depression, or substance abuse related problems. OR

B) Has been or is a victim of abuse, or resides in an abusive environment as documented by a licensed professional; OR

C) Has been unemployed for at least three of the last six months (not necessarily consecutive); OR

D) Has a family history of chronic unemployment (during the two years prior to application, family members were unemployed longer than employed); OR

E) Limited English speaking or cultural displacement. i.e., refugees.

5. INCLUDE THE STATE DEFINITION, AS DEFINED IN LAW, FOR NOT ATTENDING SCHOOL AND ATTENDING SCHOOL AS SPECIFIED IN WIOA SECTION 129(A)(1)(B)(I) AND SECTION 129(A)(1)(C)(I). IF STATE LAW DOES NOT DEFINE "NOT ATTENDING SCHOOL" OR "ATTENDING SCHOOL," INDICATE THAT IS THE CASE AND PROVIDE THE STATE POLICY FOR DETERMINING WHETHER A YOUTH IS ATTENDING OR NOT ATTENDING SCHOOL.

IDAHO CODE 33-202. SCHOOL ATTENDANCE COMPULSORY

The parent or guardian of any child resident in this state who has attained the age of seven (7) years at the time of the commencement of school in his district, but not the age of sixteen (16) years, shall cause the child to be instructed in subjects commonly and usually taught in the public schools of the state of Idaho. Unless the child is otherwise comparably instructed, the parent or guardian shall cause the child to attend a public, private or parochial school during a period in each year equal to that in which the public schools are in session; there to conform to the attendance policies and regulations established by the board of trustees, or other governing body, operating the school attended.

Other Idaho codes relating to school attendance:

Idaho Code 33-201. School Age.

Idaho Code 33-203. Dual Enrollment.

Idaho Code 33-206. Habitual truant defined.

Idaho Code 33-207. Proceedings Against Parents or Guardians.

Idaho Code 20-510. Information -- Investigation -- Petition.

6. IF USING THE BASIC SKILLS DEFICIENT DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INCLUDE THE STATE DEFINITION WHICH MUST FURTHER DEFINE HOW TO DETERMINE IF AN INDIVIDUAL IS UNABLE TO COMPUTE OR SOLVE PROBLEMS, OR READ, WRITE, OR SPEAK ENGLISH, AT A LEVEL NECESSARY TO FUNCTION ON THE JOB, IN THE INDIVIDUAL'S FAMILY, OR IN SOCIETY. IF NOT USING THE PORTION OF THE DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INDICATE THAT IS THE CASE.

Idaho has incorporated the statutory definition from WIOA Section 3(5)(A) - "who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test."

D. SINGLE-AREA STATE REQUIREMENTS

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.Any public comments will be included in the Appendices.

2. Not applicable. The Idaho Department of Labor is the entity responsible for the disbursal of grant funds.

3. Extensive surveys and communication with youth service providers found that the WIOA youth elements found to be commonly available in local service areas for youth tutoring, alternative school, education concurrent w/work prep, guidance and counseling, financial literacy education, entrepreneurial skills, labor market information and transition activities will be coordinated with other providers in the communities, rather than purchased with WIOA funds. Also, WIOA and its regulations clarify that awarding a grant on a competitive basis does not apply to the design framework component where these services are provided by the grant recipient/fiscal agent. The design framework includes intake, assessment, development of an individual's service plan and overall case management. These will determine whether occupational skills are required by the youth, negating the need for procuring the element. In Idaho, the grant recipient/fiscal agent -the Idaho Department of Labor - will provide youth design framework services.

The remaining youth elements - paid/unpaid work experiences, leadership skills, supportive services, and adult mentoring – are also provided through the Idaho Department of Labor, since it has exercised its option to provide youth workforce investment activities as the grant recipient, as noted in the response to item (C)(1) earlier in this narrative.

Youth with disabilities are a priority group for the WIOA Title I Youth program. The state has made significant efforts to ensure that services to youth with disabilities are provided in the same capacity as those without disabilities and the needs of this population are properly addressed. Many of the WIOA Youth program staff were trained under a Disability Employment Initiative grant for service provision to the targeted youth. Most WIOA partner staff providing services to employers develop key relationships with businesses to provide opportunities for work-based activities for youth with disabilities. Strong partnerships with the Idaho Division of Vocational Rehabilitation, Idaho Commission for the Blind and Visually Impaired and Idaho Educational Services for the Deaf and the Blind are utilized to develop and undertake activities as diverse as Ropes courses for teamwork and leadership development to week-long work readiness camps that help these youth achieve success by building their confidence, self-esteem and job seeking skills.

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

The requirements for infrastructure cost sharing contributions are applicable to WIOA local areas. Idaho officially consists of two local areas under WIOA – East Central Idaho, also known as Service Delivery Area 6 or Region 6, and the Balance of State, consisting of Regions 1-5. The Workforce Development Council, as the WIOA State Board, provides the policies to the local areas and the Council, acting as the local board for the two areas, is also responsible for implementing these requirements. In compliance with WIOA Sec. 121(b)(1)(A), 20 CFR 678.420, and 678.510, detailed One-Stop partner roles and resource contributions are outlined in the MOUs for each local area of the state with a Comprehensive One-Stop Center and may be found here:

- North Central Idaho (link)
- Eastern Idaho (link)

In accordance with the Statewide Idaho American Job Center Network MOU (link), Idaho One-Stop partners will be responsible to provide available career services in a non-discriminatory and universally accessible manner, provide referrals to system partners, serve populations with multiple barriers to employment, support the cross training of partner agency staff to ensure familiarity with and representation of all programs, participate as a member of the WIOA Advisory Group, and share in the equitable and proportionate share of their respective American Job Center operational costs that benefit their program(s) participants.

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

In Idaho, the state Workforce Development Council also operates as the local workforce board for the state as allowed by waiver in the approved 2020-2023 WIOA Combined State Plan and authorized in WIOA Sec. 107(c)(4). Thusly, the Workforce Development Council is responsible for the selection of Title IB providers, including the competitive procurement of the One-Stop Operator. The Workforce Development Council adopted a policy on the selection of service providers on April 11, 2019.

As a state entity, the Workforce Development Council must follow state procurement policy as authorized by the Uniform Guidelines under 2 CFR 200.320. The State Procurement Act in Idaho Code Title 67, Chapter 92 charges the Administrator of the Division of Purchasing with acquiring all property for state agencies and overseeing all solicitations. Solicitations are required to be competitive, except as otherwise provided by statute or rule.

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.

Idaho Title I-B program offers training opportunities to eligible participants in the Adult, Dislocated Worker, and Youth programs, using both Individual Training Accounts (ITAs) and contracts with employers to provide on-the-job training. The State provides detailed technical assistance guides to local service providers referring participants to training.

Because of its small population and rural nature, the Governor does not maintain a list of On-the-Job training (OJT) providers. Rather, on-the-job training is generally approached as job development negotiated with an employer for eligible participants. A copy of Idaho's Technical Assistance guide which provides WIOA Title I-B staff direction on the implementation of OJT opportunities is located here – Section 9: Occupation Skills Training/OJT (link).

Idaho maintains an extensive Eligible Training Provider List (link) to ensure consumer choice for occupational skills training is provided for all areas of the state. The state's technical colleges, proprietary schools, and Registered Apprenticeship sponsors/employers regularly submit new programs to add to the list, especially those programs which align eligible training to in-demand occupations in Idaho's high-demand industry sectors. Although the state has encountered difficulty in the past collecting performance data from the training providers, it has overcome the obstacles preventing this collection from taking place and recently submitted the required PY20 ETP reporting data, receiving recognition from USDOL for being the first state to do so in the region.

WIOA Title I-B career planners provide assistance to program participants navigating the available training options by reviewing the local or market demand for the occupational skills, and costs of training. The state's WIOA Technical Assistance Guide (cited earlier) contains information regarding occupational skills training and how program staff may provide this service to participants who may show the need for this benefit.

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.

The state Workforce Development Council (Idaho's WIOA state board), through its One-Stop Committee, ensures that activities and services are coordinated with Title I and Title II, as well as the other one-stop partners.

The Council will carry out a review of local applications submitted under Title II in the spring of 2022 for the upcoming FY2023. The Board received a presentation about the description of the process, including the timeline, and the Board chair appointed an ad hoc committee to conduct the review. With this coming year's funding cycle (FY2023) for Title II services, the Council will again be included as it participates in the review of this year's applications.

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.

All of the State-level One-Stop Partners, including the entities administering Rehabilitation Act programs and services, developed a statewide Memorandum of Understanding for the Idaho American Job Center Network. This document sets the standard for how service delivery is provided and integrated throughout the entire state. The executed MOU is located here – Executed Idaho AJC Network MOU (link).

E. WAIVER REQUESTS (OPTIONAL)

Waiver Request –

Allow the State Board to carry out the roles of a Local Board (WIOA Section 107(b))

(1) Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;

The State of Idaho is formally seeking a waiver to permit a state board to carry out the functions of a local board. This waiver request is for a renewal of a waiver previously applied to 20 CFR 679.310(f) which states that a state board must 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. The Workforce Innovation and Opportunity Act Sections 106(d)(2) and 107(c)(4) also direct a state board for a single state local area to carry out the functions of the local board. The Workforce Development Council has acted as both the state and local board under WIA since 2005, under WIOA since 2014, and the current structure is reflected in the 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;

No state or local policies limit the Governor's authority to require a regional plan or utilize the Workforce Development Council as the local workforce board for the state.

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

The primary goal to be achieved by this waiver is to reduce annual overhead and maximize the available money directed to program services, especially training and work-based learning, and services to business. The programmatic outcome is to serve a larger number of participants than would otherwise be served due to added administrative costs. To maximize resources

available for service delivery, the state continues to use the Workforce Development Council as the local workforce board throughout the state. When initially implemented, this saved the WIA program in the state approximately $1.5 million dollars by removing the administrative overhead of maintaining six regions throughout the state. Since then, these former administrative funds have been utilized as WIOA program funds, allowing for more participants to be served.

As evidenced since its initial implementation, Idaho's single statewide planning structure has continued to reduce annual overhead, and maximizes the available funding directed to training and services to business and job seekers.

This statewide structure enhances efforts to transform the system into a demand driven system. The nine Idaho Department of Labor offices serve as the state's American Job Centers offering the full range of workforce development services, and dozens of mobile locations across the state expand access into rural areas to connect citizens far from the AJCs to workforce services. This recognizes the importance of sharing data and information about new and expanding businesses to build the economy across regions.

(4) Describes how the waiver will align with the Department's policy priorities, such as: (A) supporting employer engagement; (B) connecting education and training strategies; (C) supporting work–based learning; (D) improving job and career results, and (E) other guidance issued by the Department.

The Workforce Development Council structure has been in place since the Jobs Training Partnership Act. Its current membership aligns with the prescribed composition under WIOA, including a majority of business representatives, along with partners from government, labor, community-based and educational entities. State education policy is thoroughly aligned with the state's workforce development goals.

(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;

This waiver allowing a single statewide regional planning structure has allowed for an average annual increase in training opportunities for more adults, dislocated workers and at–risk youth, and has helped the state to maintain service levels despite funding cuts over the years**.**

(6) Describes the processes used to:
(A) Monitor the progress in implementing the waiver; B) Provide notice to any local board affected by the waiver; (C) Provide any local board affected by the waiver an opportunity to comment on the request; (D) Ensure meaningful public comment, including comment by business and organized labor, on the waiver. (E) Collect and report information about waiver outcomes in the State's WIOA Annual Report.

As evidenced since its initial implementation, the single statewide planning structure has reduced annual overhead, maximizing the available money directed towards program services, including training/work-based learning, and services to business and job seekers. In the spirit of WIOA's intent, the State has emphasized spending program funds towards those individuals most in need and who can benefit from intensive staff intervention, and direct training and support of businesses and participants, all of which positively impact the achievement of performance goals.

The single statewide structure has strengthened administrative oversight and accountability processes. Prior to this change, administrative deficiencies resulted in substantial disallowed costs for Idaho's largest Workforce Investment Area. The strengthened administrative structure under the waiver has assisted Idaho to minimize disallowed costs, further enabling the redirection of funds from service provider and administration to direct participant training and support.

E1) As noted earlier in this section of Idaho's Combined State Plan, Idaho is comprised of two local areas – the Balance of State and eastern Idaho – a structure established since 2005. Under this waiver, the state Workforce Development Council serves as a statewide local board for both local areas, functioning as the planning structure outlined earlier. Prior to submission of this plan modification and previous versions, the state and the council reached out to the East Central Idaho Elected Official Consortium and its WIOA representatives, East Central Idaho Planning and Development Association (ECIPDA) to discuss any potential changes to this structure and/or affirm the existing relationship. Since the structure's establishment, ECIPDA and those it represents have unanimously supported this waiver and its objectives. Attached is the MOU (updated on February 27, 2020) between ECIPDA and the Workforce Development Council outlining the roles each have in the statewide and local governance of Idaho's workforce development system.

In addition, the Workforce Development Council itself includes several elected officials as part of its membership. Two serve as local elected officials, and two others are state representatives – one representing state House and the other the state Senate. Each member represents a different area of the state and bring a local perspective to the issues affecting workforce matters across the state. Currently, the local elected official representing cities is from the eastern Idaho local area.

E2) Funds to the local areas are distributed based on the state's WIOA Local Board Funding Distribution Policy (link), which outlines how the state allots funds to each local area.

Idaho's waiver request was posted on the Idaho Workforce Development Council's website for comment and review by required parties and the general public. An invitation was personally extended to two influential organizations in the state – the Idaho Association of Cities and Idaho Association of Counties - to provide them the opportunity to review not only this waiver, but the entire Combined State plan. No local boards are affected by the waiver. A copy of this waiver request was be provided to all members of the state Workforce Development Council, along with the PY2022-2023 Modified Combined State Plan. The State Workforce Development Council reviewed the request for submission of a waiver and the state plan during its March 16, 2022 meeting. The meeting was announced and opened to the public via a variety of means across the state.

E3) Despite the opportunities presented, no public comments were received regarding this waiver. If the state had received any, they would have been forwarded to the USDOL and included as a modification to Idaho's Combined State Plan. The impact of this waiver on the state's performance will be addressed in the state's WIOA Annual Report.

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

Not applicable.

TITLE I-B ASSURANCES

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	Yes

The State Plan must include	Include
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;	
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;	No
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA	Yes

The State Plan must include	Include
Annual Report.	
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 Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	78.6	81.4	78.6	81.4
Employment (Fourth Quarter After Exit)	80.4	80.4	80.4	80.4
Median Earnings (Second Quarter After Exit)	$7,025	$,7025	$7,025	$7,025
Credential Attainment Rate	72.2	72.2	72.2	72.2
Measurable Skill Gains	57.9	57.9	57.9	57.9
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	80.1	80.1	80.1	80.1
Employment (Fourth Quarter After Exit)	78.4	81.0	78.4	81.0
Median Earnings (Second Quarter	$7,988	$8,016	$7,988	$8,016

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
After Exit)				
Credential Attainment Rate	69.7	72.0	69.7	72.0
Measurable Skill Gains	60.4	60.4	60.4	60.4
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	73.5	75.0	73.5	75.0
Employment (Fourth Quarter After Exit)	77.9	78.6	77.9	78.6
Median Earnings (Second Quarter After Exit)	$4,350	$4,350	$4,350	$4,350
Credential Attainment Rate	49.7	51.5	49.7	51.5
Measurable Skill Gains	50.0	50.0	50.0	50.0
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

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

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.

The state of Idaho and the Idaho Department of Labor will continue to utilize state merit staff to implement required services, including labor exchange services, under the Wagner-Peyser Act.

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

IDOL is committed to investment in professional development activities for ES staff. The central office team that supports the ES program recently hired a new ES Program Specialist to focus on best practices in ES program design, and develop training to assure consistent, high-quality services around the state. The ES Program Specialist is working with a team of local office supervisors to improve onboarding processes and identify gaps in training as well as identify priorities and resources for ongoing professional development. With the multitude of webinars, resources and toolkits available through Workforce GPS, IDOL seeks to leverage these and other online tools to standardize ES staff training using quality sources, and supplement with classroom training, peer-learning and regional program meetings. IDOL hopes to be able to offer a statewide ES conference in the next year or two to bring new and seasoned staff together for professional development and reinvigorate the networking and personal connections that have faded due to travel limitations and staff turnover during the pandemic.

Additional Ongoing Professional Development for ES Staff

- Idaho's One-Stop core partners are responsible for appropriate training to ensure all staff physically present at the One-Stop can correctly provide information to customers about the programs, services and activities available through partner programs and make appropriate referrals.
- Staff training for all ES and select One-Stop partner staff on effective employer outreach techniques and coordination of business outreach among One-Stop partners.
- Training on work-based learning opportunities that can assist employers in meeting skilled-workforce needs, particularly registered apprenticeship models, and One-Stop partner programs that support work-based learning.
- In-depth analysis of regional/local labor market data, including 'real-time' labor market data provided by IDOL's Regional Economists
- One-Stop partner staff meetings to develop knowledge of partner program offerings and activities, and maintain working connections and effective referral processes.

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

As the state government agency tasked with administering the unemployment insurance program for collection of taxes from employers and disbursement of benefits to claimants, IDOL provides periodic training and general information to American Job Center staff, including ES and WIOA staff, regarding general eligibility guidelines.

Strategies to support training and awareness of UI across core programs include:

- UI Program staff provide training to all ES and WIOA staff on identification of UI eligibility issues and how to refer issues to UI staff for adjudication.
- ES staff provide RESEA services in Idaho, and they receive annual training from UI program staff specific to the requirements of the RESEA program

- Fully trained unemployment insurance staff are available by phone and via online chat, during business hours, to answer any questions from staff or claimants regarding UI issues
- UI Navigators are stationed within seven AJCs located throughout the state to provide UI claimants with in-person help such as filing UI claims, resolving basic non-monetary issues, and helping them with other unemployment insurance functions.

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

Idaho's unemployment insurance application process is available online. Idaho's iUS web-based system and staffing model is designed to provide meaningful and personalized assistance in filing a claim for unemployment compensation at Idaho's American Job Centers, as well as at partner locations, in the following ways:

- When applying online, the iUS system provides simple, written instructions in English and Spanish to assist claimants through the application process
- Each American Job Center provides several lobby computer stations to provide self-service access for filing an application for unemployment compensation or to access other online One-Stop services. Each workstation has been updated to improve data processing times, and include larger monitors to reduce user scrolling
- In addition, IDOL's mobile service delivery brings ES staff and laptops for customer use to rural communities on a scheduled basis to increase access to UI and other One-Stop programs in places far from an AJC.
- Each American Job Center also provides access to centralized, fully trained UI staff who answer questions, and assist with UI application or weekly claim filing. Centralized staff are available by phone or via online chat technology on the public access lobby computers.
- iUS user guides and real-time communications support is available for ES, WIOA, and other One-Stop Partner frontline staff from the centralized UI section to support staff provision of information.

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

Reemployment assistance is available to anyone in Idaho through the ES program, including UI claimants, unemployed individuals, and employed individuals. All job seekers who register in IdahoWorks receive an email to welcome them to the system and inform them of services available to assist with reemployment. All UI claimants receive information by email after filing their claim that directs them to register in IdahoWorks, informs them of assistance available through the AJCs, and provides links to the IDOL website where they can find information on available assistance and contact information for the AJC or mobile location nearest them.

A large number of UI customers first come to use staff- assisted ES services through the RESEA program. ES staff provide an orientation to all RESEA claimants on available AJC services. They work with each claimant one-on-one, conducting a thorough assessment of the claimant's current skills, abilities and identifying any barriers to reemployment. They also provide customized labor market information to each claimant based on their specific situation. Working together with the claimant they complete an individualized employment plan for each claimant, which may include additional follow up activities and services to assist the claimant in

returning to work as soon as possible, including referrals to community services and training services as appropriate. The RESEA program focuses on UCX claimants and those profiled as most likely to exhaust their benefits. RESEA services are provided for each claimant at an average of two and a half hours.

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:

All in-state UI claimants are required to register for work in the IdahoWorks system upon filing a claim. After filing a claim for UI, the iUS web-based system provides a link to IdahoWorks, offering immediate access to work registration and the array of labor exchange services available, including links to current employment opportunities for self-referral. Wagner-Peyser funded staff provide services to UI claimants every day as a regular part of their duties, and IDOL has placed additional emphasis on ES services to unemployed Idahoans as a strategy to address business needs as the state experiences historic low UI rates.

Department program policy, not state law, requires registration with ES.

IDOL Wagner Peyser staff are familiar with UI eligibility requirements and do eligibility assessments and referral to adjudication as required and appropriate for RESEA participants. In 2021 a more rigorous work test process was implemented where most RESEA participants are given a job referral and follow up is done with the employer to verify the application was made and determine hire status when possible. Issues detected through RESEA interviews, work test, or other interactions with UI claimants are referred to adjudication.

Idaho's WIOA Title IB programs (Adult, Dislocated Worker and Youth) reflect high service levels for UI claimants. IDOL's ES staff are co-located with WIOA Title IB staff, and they also participate in One-Stop partner and community meetings on a regular basis to remain up to date on training, education and resources. ES staff are often the first point of contact for new job seekers coming into the AJCs, whether in person or virtually, and one of their primary functions is to assess basic needs and eligibility and provide services and/or refer appropriately to WIOA Title IB or other One-Stop and community partner training programs and resources.

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.

In 2020, there were an estimated 24,000 Idaho farms producing 185 commodities. Idaho's crop farming is integrating technology and automation as labor force shortages have been a reality in agriculture for decades. Round-up ready sugar beet seeds have freed up hand hoeing and thinning. Precision agriculture has improved and sped up the drilling/planting of seeds utilizing the Global Positioning System to keep rows straight and alleviate human error. Precision agriculture also refers to tracking the amount of water in the soil to enhance efficiency in irrigation. Programmable pivots have reduced some of the labor needed to move irrigation lines.

Idaho's top five labor-intensive crops are potatoes, sugar beets, hay/grain, onions, and corn, primarily because many workers are still needed for irrigation and harvest. In addition to these,

there is large production of peas and lentils in north-central Idaho, and hops production has increased dramatically across the U.S. and Idaho, driven by the popular craft beer industry. Since 2000, hops acreage under production across the U.S. increased by 62% (Source: NASS) while Idaho's acres under production tripled. The northern and southwestern regions of the state have witnessed growth in hops that require hand-stringing, mowing, and pruning.

Nursery operations are another important agricultural activity, mainly the production of ornamental trees in north Idaho. Nursery and landscape flowers and shrubs are raised in greenhouses across southern Idaho requiring hand labor for planting during months not normally reserved for agriculture.

The dairy industry, concentrated in south central Idaho, has skyrocketed since the 1980's when California enacted environmental laws causing dairy operators to relocate operations to states with less onerous oversight. Many large dairy operations produce their own hay and forage needing both seasonal workers for irrigation, equipment operation and harvest but also year-round milking and feeding operations. The dairies milk three times a day requiring relief milkers to ensure reliability.

In 2020, Idaho led the nation in the production of potatoes, barley, food-size trout, and peppermint. Idaho's sugar beets and hops were ranked second nationally while alfalfa hay, cheese and milk were ranked third. Onions, spring wheat and lentils were ranked fourth nationally.

Idaho's need for an agricultural labor force has remained steady and has been a high-demand industry for decades but lacks supply due to its seasonality, hard physicality of the job requiring overtime during growing season, lower wages and dismal benefit packages. The projections provided by the Idaho Department of Labor's (IDOL) Research & Analysis Bureau show the need for agricultural workers is approximately 62,600 during the peak of the agricultural season.

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

Agricultural employers primarily hire foreign workers for the use of hand labor utilizing the H2A Visa program which reported 6,757 visas approved for Idaho in 2021. Producers are heavily dependent on foreign labor due to its reliance on guaranteed labor as crops must be planted, irrigated and harvested in a timely manner.

In Northern Idaho, the predominant crops are hay, barley, grain, hops, peas, beans (lentils, garbanzos, and chickpeas) wheat and grass seed. The earliest activity involves hops, stringing from April to May and training from May through June. The harvest season for hay begins in May and lasts through September. Harvest for the other groups lasts from August through Mid-September. The estimated number of farmworkers in Northern Idaho was almost 2,500 for 2020 and slightly over that amount in 2021.

In Southeastern and Eastern Idaho, the predominant crops are barley, beans, grain, hay, potatoes, and sugar beets. The hiring season begins in April for irrigation activities. The harvest for potatoes and sugar beets is in October and November, respectively, occurring later in the fall due to the later start of the growing season in the spring. In addition to farmworkers, there is a requirement for truck drivers, equipment operators from May to November, along with sorters and testers during harvest. In 2020, Southeastern Idaho had about 9,200 farmworkers and

Eastern Idaho had approximately 7,000. 2021 saw the same amount of agricultural employment for both regions.

Southwestern Idaho has greater diversity of significant crop activity: seeds, barley, beans, corn, fruits (cherries, apples, and peaches primarily), grain, hay, hops, mint, oats, onions, potatoes, sugar beets, and wheat. Workers are needed for irrigation, hoeing, topping, and harvest in the months of heavy activity. Apples and other fruits require pruning and thinning from January to March. The first cutting of hay occurs in April and can end as late as October. The number of farmworkers in Southwestern Idaho was 14,446 in 2020 and 14,698 in 2021.

The traditional South-Central Idaho crops are barley, beans, corn, grain, hay, potatoes, sugar beets, forage crops, and wheat. There is also high demand for farm equipment operators and truck drivers. Greenhouse and nursery workers are needed for seedling and plant cultivation. South central Idaho pulls sheepherders from Peru with the caveat that the Department of Homeland Security approves countries for H2A visas with a new list for each year. South Central Idaho had 15,987 farmworkers in 2020 and 15,983 in 2021.

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 characteristics of the MSFW population indicate a large percentage of MSFWs are Hispanic and predominantly Spanish speaking. Most migrant and seasonal farmworkers in or coming to Idaho originate from either southern parts of the United States (e.g., Texas, Arizona) or Mexico. The popularity of the H2A visa program has replaced the diminishing pool of domestic migrant seasonal farmworkers, many of which found jobs in construction or agricultural jobs closer to home. In 2021, the number of certified H2A visas rose to 6,757. The number of MFWs range from a low of 3,600 in the winter months to the peak of 18,200 in October. Much of the work is seasonal reflecting on the workforce for this industry.

Due to the difficulty in estimating farm employment on a monthly basis, IDOL staff utilize data from a variety of sources to establish MSFW population projections for the state. These include the U.S. Department of Agriculture's Census of Agriculture, U.S. Census Bureau and the Idaho Department of Labor's Quarterly Census of Employment and Wages (QCEW) data. The need for agricultural workers is projected to remain at slightly more than 62,600 during the peak of the agricultural season, which is the month of October when most of the crops are harvested statewide.

4. OUTREACH ACTIVITIES

In an effort to address the unique regional challenges that the system faces in our state, primarily with service accessibility in rural and remote areas and reductions in federal funds, in the summer of 2019 the Idaho Department of Labor implemented new service delivery model. Face-to-face service can now be found in approximately 47 communities around the state, an increase of more than 100 percent from the agency's previous brick and mortar offerings. The new model modernizes how the department delivers services, focusing on increasing IDOL's presence while decreasing its physical footprint. It is more adaptable to fluctuations in the economy and empowers staff to be more responsive to community needs.

Bureau of Labor Statistics' farmworker estimates are significant for the three southern regions of the State. However, IDOL will provide appropriate outreach from its AJCs in the following communities located in these agricultural regions throughout the state:

- **Caldwell AJC** - Located in city of Caldwell, provides services to Canyon County
- **Burley AJC** - Located in the city of Burley, provides services to Minidoka and Cassia counties
- **Pocatello AJC** - Provides services to Bingham, Power, Franklin, Caribou, Bear Lake, Oneida and Bannock counties

In addition, during the months of high agricultural activity, the department will provide or coordinate activities to reach MSFWs in the following communities although the department may no longer have an AJC located there:

- **Sandpoint AJC/Bonners Ferry Mobile Service Delivery** -Provides services to Boundary County
- **Twin Falls AJC** - Provides services to Twin Falls, Jerome, Gooding, and Lincoln counties
- **Caldwell AJC/Mountain Home Mobile Service Delivery** - Provides services to Elmore and Owyhee counties
- **Caldwell AJC/Payette Home Mobile Service Delivery**- Provides services to Washington and Payette counties
- **Idaho Falls AJC/ Rexburg Mobile Service Delivery** - Provides services to Jefferson, Butte and Bonneville counties and Clark, Fremont, Madison, and Teton counties, respectively.

Migrant and/or Seasonal Farmworker (MSFW) outreach staff are located in the American Job Centers listed above to best serve the state's high agricultural areas. The department will ensure bi-lingual English/Spanish capability of staff assigned to outreach and ensures multi-lingual access through the use of language line tools to the state's one stop system. All AJC staff participating in the outreach effort will receive training on the use of language line tools, including mobile location staff who may assist in the effort where there may be no AJC located in a specific community and may resort to use language line tools to assist in communication efforts.

During each year of this four-year plan, the department's Wagner-Peyser (W-P) staff, in collaboration with its partner organizations also serving MSFWs throughout the state, will plan to reach 10% of the estimated migrant/seasonal farmworker population during the peak of the agricultural season in the counties served by outreach offices. As noted by USDOL, these numerical goals are in reference only to the proposed outreach activities and are not negotiated performance targets. The offices noted in italics below serve as the principal locations within their respective regions with the responsibility for not only ensuring appropriate MSFW outreach but service provision as well.

AJC REGIONS - Community Locations	Estimated Farmworker Population*	Outreach Goals W-P Staff	Outreach Goals in Conjunction with Other Agencies
NORTH IDAHO – *PLANNED STAFFING: .15FTE/ year W-P*			
Sandpoint/Bonners Ferry	650	39	26

AJC REGIONS - Community Locations	Estimated Farmworker Population*	Outreach Goals W-P Staff	Outreach Goals in Conjunction with Other Agencies
SOUTHWEST IDAHO – *PLANNED STAFFING: 1 FTE/year W-P; .03/year Cooperating Agency*			
Payette	2,558	153	102
Caldwell	5,668	340	226
Mountain Home	2,735	164	109
SOUTH-CENTRAL IDAHO – *PLANNED STAFFING: 1 FTE/year W-P; .06/year Cooperating Agency*			
*Twin Falls***	10,045	297	203
Burley	5,297	317	206
SOUTHEAST IDAHO – *PLANNED STAFFING: 1.5 FTE/year W-P; .06/year Cooperating Agency*			
Idaho Falls/Rexburg	5,744	344	229
Pocatello/Blackfoot	9,004	540	360
Total	**41,701**	**2,194**	**1,461**

Idaho Department of Labor: Estimated Agricultural Employment-*December 2021*

**Farmworker population based on counties which make up the AJC regions & service locations. **Twin Falls - 5% outreach; adjusted due to high dairy count*

Designated MSFW outreach staff are creative in seeking out opportunities to contact farmworkers who may not be reached through the normal intake activities conducted at the AJCs, especially with the impact created from the COVID-19 pandemic. However, outreach staff have resumed their efforts as much as possible and are adjusting their approach as needed based on the pandemic's current status.

ES staff target Idaho farmworkers through different types of media outlets, such as the multitude of radio stations in the state with Spanish programming that regularly air public service announcements from the Idaho Department of Labor. These announcements provide notice of the workforce development system's services and are used to inform and educate farmworkers and their families about the services and protection available in the state of Idaho.

Individual MSFW outreach staff also make direct appeals and other announcements via their local radio stations. Special presentations are made to English as a Second Language groups, Hispanic high school students and other groups of farm workers to encourage use of the *IdahoWorks* system and the state's One-Stop system services.

In addition, MSFWs and Idahoans across the state will see, hear and read about accessing Idaho Department of Labor services in the service delivery model described earlier. "Let's Talk Work" is a bilingual (English and Spanish) outreach campaign designed to help job seeker and employer customers find their nearest IDOL location via radio, print ads, billboards and social media. The overarching message - "Help is Closer than You Think" – reinforces the fact that help

with finding a job, filing for unemployment insurance or improving one's skills is just a phone call away.

The Idaho Department of Labor prints bilingual brochures, posters and flyers for dissemination at and beyond the AJCs. One example is an easy-to-carry bilingual rack card, which outlines the state's complaints process which provides MSFWs guidance on how to file a complaint or wage claim.

Assigned outreach staff contact MSFWs at their work sites, labor camps, living areas, and other places frequented by the migrant and seasonal farmworkers. Outreach staff also attend community events on evenings and weekends where migrant and seasonal farmworkers are in attendance.

Outreach workers encourage MSFWs to come into the local AJC one-stop or mobile location for more in-depth assessment and to register for available services. For those who choose not to or cannot visit their local AJC, the outreach worker provides on-site assistance for services that may be available, such as prepare and accept complaints or apparent violations, provide information on local labor markets and training opportunities or referral to other service providers.

Outreach workers in Idaho have not limited themselves to pounding the pavement to contact MSFWs. Since 2013, an outreach worker in Southcentral Idaho has hosted a local radio show periodically as a means of offering MSFWs information about the services available through the department. Topics ranged from recruitment efforts for the WIOA Youth Program which targets out-of-school youth, to discussions regarding Idaho and federal labor laws impacting agricultural employment. Radio as an outreach tool has also been used by outreach workers from the Caldwell, Twin Falls and Idaho Falls AJCs during the last year.

The AJCs with outreach staff have permanent and/or temporary staff who are bilingual in Spanish to conduct outreach. During the area's peak agricultural season, if resources permit, additional temporary bilingual staff will be used to support MSFW activities.

A primary resource available to all outreach workers is the MSFW page in the department's internal employee website, "EPIC", which provides all the information needed for all department staff who work with MSFWs. It includes Spanish language materials addressing One-Stop services, local contacts for groups serving MSFWs, as well as basic material outlining the rights MSFW are entitled to.

The State Monitor Advocate assists the department by providing training and technical assistance to One Stop Staff, especially dedicated MSFW outreach personnel, concerning the MSFW special service requirements and best practices, much of it on a one-on-one basis. The topics presented during trainings include outreach practices, labor law updates, H-2A/Foreign Labor Certification, the Employment Service Complaint System, and labor market information. During PY20, the Monitor Advocate conducted two statewide MSFW services trainings and one complaint system training via virtual means to AJC staff throughout Idaho.

The State Monitor Advocate also provides training and technical assistance to AJC staff during the review visits to significant offices, and as needed and/or requested by office managers. Due to the pandemic, this was not possible during the last PY. However, the Monitor Advocate has prioritized providing one-on-one training and technical assistance to newly hired outreach personnel. The Monitor Advocate has continued to make this practice a priority during subsequent years and will resume with the onboarding of new outreach staff. As new outreach staff onboard, individualized technical assistance continues as a program mainstay, especially in these times plagued by the pandemic. As COVID subsides, in-person training and technical assistance presentations may resume as necessary

To bolster the one-on-one training and technical assistance, the State Monitor Advocate has also organized an annual, statewide MSFW/H2A training conference over the years. In addition to IDOL staff, a significant number of staff from the state's National Farmworker Jobs Program (NFJP), the Community Council of Idaho, also participate in the training. Multiple Idaho state Department of Education staff, along with local school district employees, and other community service programs, such as Idaho Legal Aid, have also attended this two-day event over the last several years. However, because of the COVID pandemic, this event did not take place in the spring of 2021. It is hoped that the event may resume once the impact of the Corona virus has subsided.

These conferences, usually held in March, have been considered very successful. Participant feedback has shown that these conferences are an efficient tool for training staff, allowing for the sharing of new techniques and approaches on providing MSFW services, and strengthening partnerships with other state and federal agencies and local organizations serving farmworkers. Past presenters have included district directors from each of USDOL's Wage & Hour and EEOC divisions, an agricultural economist from the University of Idaho, as well as state program staff addressing services and systems such as the complaints process.

MSFW outreach workers are merit staff for Wagner-Peyser Employment Services and receive an overview of the Unemployment Insurance process. As part of the one-stop system, the outreach workers are also responsible for providing information regarding ES services, farmworker rights, Unemployment Insurance, the complaint system, WIOA Title I-B employment and training services for Adults, Dislocated Workers and Youth, WIOA Title II Adult Education services, WIOA Title IV Vocational Rehabilitation services, SNAP and TANF benefits, along with other community services that may be available.

The MSFW page in the department's internal website, EPIC, keeps updated program information available for outreach workers. Not only are outreach workers aware of the WIOA core program services, but they are also active collaborators in advocating for and recruiting participants. Over the last four PYs, Governor's Reserve/state funds have been set aside to provide additional assistance to MSFW youth at the behest of outreach staff. American Job Center staff, including outreach workers, continue to work together to find eligible individuals in the MSFW communities to connect them to Title IB services. During the end of PY20, the department implemented a media outreach campaign targeting MSFW and Hispanic youth to encourage their enrollment in the Title I-B youth program. AJCs all along the Snake River plain have seen an increase in these youth expressing an interest in the program.

For the past several years, the state has spearheaded an effort to increase WIOA Title I-B Youth program enrollment of MSFW and Hispanic youth through an infusion of Governor's Reserve funds under the requirement to provide additional assistance to local areas with high concentrations of eligible youth. For PY20, a portion of these funds flowed to areas of the state with agricultural activity to target this population in an enhanced recruitment effort.

As merit staff for Wagner-Peyser Employment Services, MSFW outreach workers receive regular professional development activities described in (a)(2) of the Wagner-Peyser section of this plan.

The State maintains training programs for local service delivery staff, which includes MSFW outreach staff. Instruction is provided as needed. Training is also periodically open to One-Stop partner staff as well. Management development has also been a focus for delivering quality customer service over the long term.

With a cooperative agreement with the Community Council of Idaho (CCI- Idaho's Sec. 167 grantee) and other partner agencies, the Idaho Department of Labor serves as the lead organization in coordinating outreach efforts at both the state and local levels. All partners are dedicated to increasing MSFW customers' awareness and access to education, training and

other services. CCI, as Idaho's NFJP grantee, is not a subrecipient conducting outreach, but rather actively collaborates in the effort.

At a minimum, the following collaborative activities will occur during the upcoming agricultural seasons:

- The memorandum of understanding/cooperative agreements for coordination of services between the Idaho Department of Labor and the Community Council of Idaho is in the process of being reviewed and renewed.
- Ongoing, mutual participation in staff training and ongoing communications to improve MSFW access to community services, particularly workforce services through the One Stop system
- Partners are collaborating on developing and sharing outreach materials among all entities
- Coordination of community information and staffing efforts at the local level to enhance outreach
- The administrative entities have reached data sharing agreements, facilitating reporting and data analysis which improves partnership and service delivery, along with opportunity assessment and process enhancement to streamline co-enrollment

To leverage resources, staff coordinate outreach activities with local partner organizations, targeting large events to contact a greater number of farmworkers. The State Monitor Advocate and outreach workers continue to make use of appropriate media, especially public service announcements using the multitude of radio stations throughout the state with Spanish programming.

Program service information is presented verbally and/or in writing in both English and Spanish. In many instances, these efforts are coordinated with other agencies, such as Idaho Legal Aid, the Community Council of Idaho, and others in order to provide MSFWs with a comprehensive look at the services available to them.

In order to protect Idaho's agricultural labor force from exposure to the COVID virus, the state Monitor Advocate coordinated efforts with St. Luke's Hospital allowed for the distribution of guidance, posters and other information to agricultural employers and workers across the state. Various health providers in the state aided these efforts by creating awareness and by volunteering during immunization clinics that were organized specifically for Idaho farmworkers. Outreach workers in the areas where these events took place where made aware of these events so they could relay the information to the MSFWs they came across.

In addition, during PY2020, the Monitor Advocate donated more than 400 protective masks and received a donation of more than 3,000 masks that were distributed to farmworkers across the state during the pandemic. This effort also included the creation and maintenance of a Facebook page to reach out to monolingual, Spanish speakers farmworkers with the purpose of providing reliable information on verified resources Trabajadores Agrícolas de Idaho | Facebook

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

Providing career and training services to MSFWs

The Idaho Department of Labor, its AJCs, and mobile locations provide the full range of ES benefits and protections, including the full range of job counseling, testing, and job and training referral services to MSFWs. The agency continues to expand services to agricultural workers and employers by coordinating basic labor exchange services, outreach, information

dissemination, and training workshops with other One Stop partner agencies, organizations and the employer community. Working relationships exist with the Community Council of Idaho, Idaho Legal Aid Services, Inc., and various agricultural producer organizations to provide services and information. AJC and mobile office staff are fully informed of the services available to farmworkers in their areas, including short-term training programs, ESL classes, etc. Once in an AJC or mobile location, staff thoroughly assess the skills, strengths, and needs of farmworkers who register with the system, and make appropriate referrals to jobs and training opportunities. With this information, farmworkers may make informed employment decisions and have meaningful access to all the services that are available through the state's One Stop network.

With the recent transition of WIOA service providers, the state looks to maintain a sustained level of service to MSFWs visiting AJCs across Idaho in search of appropriate workforce services. Aware of this change, state outreach workers make active referrals to the new provider, Equus Workforce Solutions, which has ensured the state and the Workforce Development Council that it has the capacity to serve all those in need of service, regardless of any potential language limitation a visitor, including MSFWs, may have.

Services Provided to Farmworkers and Agricultural Employers

Agricultural-related job listings have increased over the years, primarily due to the rapidly increasing demand for foreign workers through the Foreign Labor Certification programs, initiated through the Agricultural Clearance Order process. As noted earlier, this activity has increased significantly in the state over the past several years. Many of the employers utilizing this program are members of the Snake River Farmers' Association (SRFA), Western Range Association (WRA) and Mountain Plains Agricultural Services (MPAS), which act as a recruitment agency for Idaho agricultural employers. The state's H-2A activity for FY 2020 shows a slight decrease in applications over the previous year, with 699 applications recorded for the recent FY, and 715 in PY19. However there were more than 4,664 positions listed in FY20, a 4.2 increase over the previous year. The program is currently on track to match or exceed the previous year's activity. As more H-2A applications are submitted, and more positions requested to be filled by foreign labor, the placement of domestic agricultural workers has unfortunately declined over time.

Basic labor exchange services are provided to the agricultural employer community through the automated process of matching job seekers to job orders received as well as recruitment and direct referral from staff. IDOL continues to provide information about ES services and assist agricultural employers through direct employer visits and outreach to grower organizations, county extension offices, and through special presentations and seminars to agricultural employers, farm labor contractors, and local employer committees. Information may be provided through radio and TV, or other media in conjunction with other agencies and organizations involved with the agricultural employer community. These efforts are coordinated with other outreach efforts that are developed as part of the respective area's One Stop system.

To identify agricultural employers in labor needs, the department reviews prior year job orders and request input from grower organizations and local employer committees. Direct outreach activities, specialized surveys and other labor market information available through IDOL and One Stop system will also be used to identify agricultural employer needs. Information from other agencies or organizations that represent or serve the agricultural community will also be solicited to identify areas of needed services.

IDOL will continue to expand services to agricultural workers and employers by coordinating basic labor exchange services, outreach, information dissemination, and training workshops with other One Stop partner agencies, organizations and the employer community. As noted earlier, IDOL's extensive working relationships help to ensure an information exchange on

available services. To reduce the impact on domestic workers, the department continues its coordination with the NFJP grantee and other partners to identify pools of available and eligible workers who may take advantage of the agricultural listings throughout the state.

The state's approach to enhanced business services takes a regional focus to serving employers, targeting activities such as outreach, one-on-one meetings with select employers to learn their workforce needs, office team discussions and strategy session on how best to respond to identified employer needs. Enhanced collaboration is channeled through the state's AJCs and mobile locations, which direct the coordination of workforce needs with education, economic development and workforce partners across the state. All of which leads to a streamlined service delivery which is logged through the state's *IdahoWorks* management information system, which provides automated business services tracking and information management to all AJCs and mobile locations.

The state has multiple resources available to provide information regarding the complaint system. Outreach workers and one stop partners encourage MSFWs to come to their local AJC or mobile location to register for all available services. For those who choose not to or cannot visit the AJC, the outreach worker provides on-site assistance for services including the preparation and acceptance of complaints or apparent violations.

Information about the complaint system is not only provided via outreach orientation of the services available through IDOL's various locations, but also through various documents available in the AJCs and the Idaho Department of Labor's website. This allows One-Stop partners' access to those same documents to distribute to their customers. Public Service Announcements (PSAs) are also used to notify MSFW customers of available services, including the complaint system. The PSAs, distributed to Spanish-speaking radio stations across the state, are used to inform and educate farmworkers and their families about services and protection available in the state of Idaho. Ongoing efforts continue to improve outreach to inform MSFWs and the rest of the public about the state's ES complaint system.

Over the last several years, a Spanish radio station in the city of Burley collaborated with its local AJC to reach out to the Spanish-speaking community. When originally aired, the employment-related segments generated more calls than usually received during the previously scheduled broadcast for that hour timeslot. Because of its popularity, the radio station established a regular Friday morning, hour-long show that continues to provide information to the public on a multitude of issues revolving around the area of employment. Since it began in 2013, the segments addressing the complaints system and worker's compensation that have been periodically presented are likely to elicit more calls from the listening audience.

The efforts to inform Wagner-Peyser program users of these services found some success, as the Idaho Department of Labor processed 478 Employment Services complaints, four of which were MSFW complaints, accompanied by two apparent violations. Wages remain the number one issue cited by program customers, as the state's Wage and Hour Section addressed 52 MSFW wage claims, which is an overall increase from PY19. During that period, 440 complaints were processed, none from MSFWs however, there were three apparent violations. Thirty-nine farmworker wage claims were also reviewed by the Wage and Hour Section.

Agricultural jobs, both temporary and permanent, continue to be important to local economies throughout the state. The increased interest by agricultural employers in having a reliable workforce at the "right" time is gaining in importance compared to other considerations such as costs. This situation presents a phenomenal opportunity for the Idaho Department of Labor and the One-Stop System to demonstrate to employers, workers and the public that AJCs and their partners can be the First Stop and the Only Stop in helping agricultural workers find jobs with agricultural employers find a suitable workforce through utilization of the ARS.

IDOL is working to provide agricultural employers with information on ALL programs and resources available to help them with their labor needs. By emphasizing that the ARS is simpler to use, costs less, and does not require another federal agency's involvement, employers will be encouraged to consider ARS as an integral part of their effort to locate qualified citizen/legal resident domestic workers in other parts of the state/country.

Information about the ARS continues to be shared and distributed to agricultural employer groups and associations and statewide publications including the Idaho Employment Newsletter, Idaho Farm Bureau and other major publications. MSFW outreach staff and regional business services staff also provide information about the ARS as they reach out to employers to orient them about One-Stop services for businesses.

6. OTHER REQUIREMENTS

A. COLLABORATION

As mentioned before, IDOL maintains several agreements and partnerships with other WIOA Core programs and partners throughout the state, each which have a significant impact on MSFWs across the state. For example, The Community Council of Idaho is represented on the One-Stop Committee of the state Workforce Development Council, Idaho's WIOA State Board. The state's monitor advocate and the Community Council have also entered into an agreement outlining the services that the SWA and NFJP grantee will both provide their efforts to reach out and increase services to MSFWs across the state.

In addition, the Idaho Department of Labor has agreements with several universities' High School Equivalency Program (HEP) and College Assistance Migrant Program (CAMP) programs across the state to work in conjunction with both to offer the most effective and best possible services to MSFWs participating in those programs. Another strong collaborative effort the agency has maintained over the years is with U.S. DOL's Wage and Hour Division regional office. A Memorandum of Understanding between the two entities is designed to maximize and improve the enforcement of laws administered by both agencies through greater coordination. This MOU has been helpful to both agencies in their efforts to seek remedy for MSFWs impacted by those who sought to take advantage of them.

Also, the statewide training conferences, coordinated in partnership with the state monitor advocate, the College of Idaho, the Community Council of Idaho, the state's HEP/CAMP programs, have included AJC and NFJP staff, as well as other partner staff. And will continue to do so in the future. As in previous years, attendees also included state education agency and local school district representatives, along with Boise State University's HEP and CAMP programs. Training highlights include the state's complaint system, and the challenges and obligations faced by Idaho's agricultural employers relating to immigration. Plans for future trainings are already underway. A consortium comprised of the State Monitor Advocate, NFJP grantee staff and representatives from colleges and universities across the state meet periodically to expand informational offerings to not only MSFW service providers, but the public as a whole to provide them awareness of MSFWs across the state. However, because of the COVID pandemic, this event did not take place in the spring of 2021. It is hoped that the event may resume once the impact of the Corona virus has subsided.

At a minimum, the following collaborative activities will occur during the upcoming agricultural seasons:

- Review/renewal of cooperative agreements for coordination of services between the Idaho Department of Labor and the Community Council of Idaho
- Ongoing, mutual participation in staff training and ongoing communications to improve MSFW access to community services, particularly workforce services through the One Stop system

- Collaboration on development and sharing outreach materials among all entities
- Coordination of community information and staffing efforts at the local level to enhance outreach
- Sharing data for reporting and data analyses to improve partnership service delivery
- Assessment of opportunities and enhancement of processes to streamline co-enrollment

In order to leverage resources, staff will coordinate, where possible, outreach activities with partner organizations in their area, targeting large events where a greater number of farmworkers may be contacted. The State Monitor Advocate and outreach workers will continue to make use of appropriate media, especially public service announcements using the multitude of radio stations throughout the state with Spanish programming.

The existing core and One-Stop partners form the state level WIOA Advisory Group, which meets regularly to discuss the continued improvement of the state's robust one-stop service delivery design. This collaboration is also engaged at the service delivery area level to ensure that their specific program services are integrated into the local one-stop delivery system. As part of the continuous improvement and design of the One-Stop service delivery, new partners are actively recruited.

Supplementing the cooperative agreements noted earlier, the required One-Stop Memorandum of Understanding addresses the service delivery integration and collaboration of the partners in providing services to MSFWs. Each memorandum of understanding will be reviewed within the required three-year timeline to ensure that the collaborations are still productive and make adjustments as necessary to ensure service delivery alignment.

B. REVIEW AND PUBLIC COMMENT

The State Monitor Advocate reviewed this plan and provided direct contributions in drafting this agricultural plan, with consideration given to the annual summary developed under 20 CFR 653.108(g)(4).

Electronic copies of this plan have been provided to Idaho's WIOA 167 grantee- National Farmworker Jobs Program, Community Council of Idaho, with a request for written comments by February 25, 2022. A draft of this 2020-2023 Agricultural Outreach Plan-PY22 Modification, and a request for comments have also been sent out the same day to the following agencies/service providers with instructions to provide comments:

Erik Johnson, Director Migrant Unit Idaho Legal Aid Erik.johnson@idaholegalaid.org

Jane Donnellan, Administrator Idaho Division of Vocational Rehabilitation jane.donnellan@vr.idaho.gov

Michelle Kelley, HEP/CAMP Recruiter Boise State University mkelley@boisestate.edu

Sarah Seamount, Migrant Coordinator Migrant Education Programs Idaho Department of Education sseamount@sde.idaho.gov

Irma Morin, Executive Director Council of Idaho imorin@ccimail.org

Korene González, Director Employment and Training Community Council of Idaho KGonzalez@ccimail.org

Roy Vargas, Farm Foreman Former FLC rvargas1276@gmail.com

Sonia Martínez, Diversity Outreach Coordinator Idaho State University orstem@isu.edu

Sam Byrd, Director Centro de Comunidad y Justicia sbyrd@comunidadyjusticia.org

Margie Gonzalez, Executive Director Idaho Commission on Hispanic Affairs
Margie.gonzalez@icha.idaho.gov

Brian S. Bean, Lava Lake Land and Livestock brian@lavalake.net

A draft of this plan was incorporated as part of Idaho's WIOA Combined State Plan-PY22 Modification, which also underwent a public comment period ending February 25, 2022. Two stakeholders commented during the 30-day comment period regarding the state's AOP . One of the comments targeted the collaboration and coordination of outreach efforts between state Migrant Education program staff and ES outreach staff to maximize both programs' ability to find and serve MSFWs needing services. The other comment presented that the closure of offices across the state during the pandemic adversely impacted many MSFW and Hispanic families lacked internet access. The comment also noted that Spanish speakers struggle with the state's unemployment insurance system. Both of these items have been directed to the appropriate area within the agency.

C. DATA ASSESSMENT

The following data regarding Idaho's performance versus actual attainment of minimum service levels was provided by the department of Labor's *IdahoWorks* MIS system and the department's electronic outreach log records.

Prior to the full implementation of WIOA, the state struggled to achieve *Attained* status for all three of the MSFW Compliance Indicators. Since then, the state has seen improvement with few measures lacking. However, this may be attributed to several issues, mostly due to the reporting requirements under WIOA. Many of these measures are based on wage-related data. The lag time in reporting wages, which relies on automated reporting from employers, can cause a delay. In addition, because of WIOA's requirements, an individual that is considered active in any of the partner programs, despite obtaining employment, is not considered as exited from a program and therefore not immediately counted in the measures. As a result of both of these reporting issues, some placements may not be counted if one continues their active status in a program such as Wagner-Peyser (Labor Exchange).

With regards to the MSFW Equity Indicators, IDOL notes that a comparison of these over the years shows that the state is consistently meeting the majority of these numbers. Unfortunately, the overall number of applications has decreased which subsequently affects the indicators. The pandemic played a significant role in the establishment of these annual universes, as noted with the decrease in the number of non-MSFWs during each PY.

The Idaho Department of Labor also notes that the Compliance Indicators goals were established by USDOL in the 1970's, and strongly recommends a review of these fixed outcomes. Updating the static measures to something more equitable and reasonable would be more in line with the philosophy behind WIOA to consider current, up-to-date data which reflects economic and labor conditions, as well as the technology applies more relevance to these measures relevant.

<u>Corrective Action</u> - *Wagner-Peyser management and outreach staff will assess data collection options to increase documentation of placements on job orders listed with AJCs. Connections with agricultural employers will increase as outreach staff continue to connect with the department's employer service efforts implemented under WIOA. One-Stop partners have also been encouraged to refer MSFWs to the AJCs to assist them in fully accessing the state's labor exchange system. Future staff presentations will include an emphasis to ensure that MSFWs receive a full complement of services when present in an AJC or mobile office location, including referrals to WIOA Title I-B as necessary.*

PY 2017	**# of**	**% of**	**# of Non-**	**% of Non-**	**<u>Equity</u>**

MSFW Equity Indicators	**MSFWs**	**MSFWs**	**MSFWs**	**MSFWs**	
Total Applications	89	100%	13,555	100%	
Referred to Employment	36	40.45%	3,272	24.14%	**Yes**
Received Staff Assisted Services	87	97.75%	12,563	92.68%	**Yes**
Referred to Support Service	0	0.00%	0	0.00%	**Yes**
Career Guidance	18	20.22%	3,501	25.83%	**No**
Job Development Contact	49	55.06%	7,898	58.27%	**No**
Compliance Indicators	**# of MSFWs**	**% of MSFWs**	**# of Non-MSFWs**	**% of Non-MSFWs**	**Compliance**
Placed in Job	84	94.38%	11,569	85.35%	**Yes**
Placed $.50 above min Wage	0	0.00%	2	0.01%	**No**
Placed in Long Term non-ag Job	84	94.38%	11,569	85.35%	**Yes**
PY 2018 **MSFW Equity Indicators**	**# of MSFWs**	**% of MSFWs**	**# of Non-MSFWs**	**% of Non-MSFWs**	**Equity**
Total Applications	240	100%	16,308	100%	
Referred to Employment	67	27.92%	2,607	15.99%	**Yes**
Received Staff Assisted Services	228	95.00%	15,399	94.43%	**Yes**
Referred to Support Service	0	0.00%	0	0.00%	**Yes**
Career Guidance	41	17.08%	3,139	19.25%	**No**
Job Development Contact	136	56.67%	9,461	58.01%	**No**
Compliance Indicators	**# of MSFWs**	**% of MSFWs**	**# of Non-MSFWs**	**% of Non-MSFWs**	**Compliance**
Placed in Job	144	60.00%	9,019	55.30%	**Yes**
Placed $.50 above min Wage	0	0.00%	0	0.00%	**Yes**
Placed in Long Term non-ag Job	144	60.00%	9,019	55.30%	**Yes**
PY 2019 MSFW Equity Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Equity
Total Applications	219	100%	17,006	100%	**Yes**
Referred to Employment	49	22.37%	1,918	11.28%	**Yes**
Received Staff Assisted Services	215	98.17%	9,916	58.31%	**Yes**

Referred to Support Service	0	0.00%	0	0.00%	**Yes**
Career Guidance	33	15.07%	2,371	13.94%	**Yes**
Job Development Contact	146	66.67%	10,210	60.04%	**Yes**
Compliance Indicators	**# of MSFWs**	**% of MSFWs**	**# of Non-MSFWs**	**% of Non-MSFWs**	**Compliance**
Placed in Job	150	75.76%	9,049	69.50%	**Yes**
Placed $.50 above min Wage	NA	NA	NA	NA	**NA**
Placed in Long Term non-ag Job	98	86.73%	6,947	88.54%	**No**
PY 2020 MSFW Equity Indicators	# of MSFWs	% of MSFWs	# of Non-MSFWs	% of Non-MSFWs	Equity
Total Applications	109	100%	13,173	100%	**Yes**
Referred to Employment	9	8.26%	759	5.76%	**Yes**
Received Staff Assisted Services	109	100%	13,116	99.57%	**Yes**
Referred to Support Service	0	0.00%	0	0.00%	**Yes**
Career Guidance	12	11.01%	1,247	9.47%	**Yes**
Job Development Contact	68	62.39%	7,733	58.70%	**Yes**
Compliance Indicators	**# of MSFWs**	**% of MSFWs**	**# of Non-MSFWs**	**% of Non-MSFWs**	**Compliance**
Placed in Job	130	71.04%	9,066	64.28	**Yes**
Placed $.50 above min Wage	NA	NA	NA	NA	**NA**
Placed in Long Term non-ag Job	107	85.60%	8,321	86.77%	**No**

D. ASSESSMENT OF PROGRESS

Year after year, the state continually exceeds its overall planned outreach objectives for the season, achieving its outreach-contact goal of contacting 10% of MSFWs throughout the state, For PY20, state outreach workers contacted 6,633 MSFWs across Idaho, providing them information about the multiple services cited earlier. The state will strive to reach its goals of exceeding its planned outcomes for the year.

As noted earlier, the number of actual MSFW applications for the state has decreased significantly, which coincides with the period during which the department has implemented its automated IdahoWorks system as a member of the AJLA consortium. This, in combination with the changes in WIOA's reporting requirements, have likely led to the reduction in overall MSFW applications. However, recent changes to how the Idaho Works system poses questions to users to allow them to identify themselves more easily as MSFWs, should lead to an increase in the state's MSFW applications. The state will review MSFW registration numbers periodically throughout the year to ensure MSFW applicants are being coded correctly so they can be served and included in reporting.

E. STATE MONITOR ADVOCATE

The State Monitor Advocate, funded by Wagner-Peyser, is the department's lead representative to ensure that ES services are coordinated with other MSFW service providers, to identify overall changes in agricultural employment, MSFW trends, employment rights, and to recommend new program approaches. The Monitor Advocate Unit will continue to conduct ongoing monitoring of the service provided to Migrant and Seasonal Farmworkers. Reviews will be conducted in each of the significant offices to identify the needs and concerns that affect the provision of services for farmworkers and provide technical assistance as appropriate. The issues identified will be brought to the attention of the Administrative and Executive personnel when necessary.

On February 1, 2022, the state Monitor Advocate approved the state's final draft of its Agricultural Outreach Plan, after offering suggestions and commentary to ensure the state is able to appropriately meet the needs of MSFWs across Idaho. The AOP has been included as part of the overall WIOA Combined State Plan and was made available for public comment. Comments were incorporated earlier in the AOP in Section 6.B.

WAGNER-PEYSER ASSURANCES

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

The State Plan must include	Include
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.	

WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	64.0	65.7	64.0	65.7
Employment (Fourth Quarter After Exit)	65.0	66.2	65.0	66.2
Median Earnings (Second Quarter After Exit)	5900.0	6175.0	5900.0	6175.0
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

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

A. ALIGNING OF CONTENT STANDARDS

Idaho's Adult Education program has formally adopted the College and Career Readiness (CCR) Standards for Adult Education, as developed by Susan Pimentel and MPR Associates for the US Department of Education in 2013. As stated in the introduction to the standards, the CCR Standards represent a subset of the Common Core State Standards, which are "most indispensable for college and career readiness and important to adult students."

The Idaho Department of Education (K-12) has adopted the Common Core State Standards for mathematics and English language arts for K-12, also known as the Idaho Core Standards. Because both the Idaho Core Standards and the CCR Standards for Adult Education are derived from the Common Core State Standards, they are well aligned. In the case that Idaho's K-12 standards are revised, replaced, or otherwise changed, the State's Adult Education program will realign its standards appropriately.

B. LOCAL ACTIVITIES

i. How Idaho Will Fund Eligible Providers

As the Eligible Agency administering Title II programs, the Idaho Division of Career & Technical Education awards AEFLA funds through a competitive grant application process. Please refer to section III.b.5.B.i—ii in the *common-elements* portion of Idaho's Combined State Plan for more detailed information about the Title II competitive grant application process.

Eligible providers are any organizations who have 'demonstrated effectiveness' in providing adult education and literacy activities and may include: local educational agencies; community-based or faith-based organizations; volunteer literacy organizations; institutions of higher education; public or private nonprofit agencies; libraries; public housing authorities; a nonprofit institution having the ability to provide adult education and literacy services to adults; and a consortium of agencies, organizations, institutions, and libraries described above. *(Section 203(5))*

Funds are awarded as multi-year grants on a competitive basis to eligible providers via regional competitions. All regional competitions use the same process and application materials issued by the State to ensure direct and equitable access. The competition is announced across a variety of platforms to ensure statewide participation. These platforms include local newspapers, the States' monthly newsletter, press release, social media, and contacts with other state and local agencies and workforce partners.

The regional competitions adhere to the provisions set forth in WIOA Title II Section 231 – *Grants and Contracts for Eligible Providers,* and Section 232 – *Local Applications*. Grantees receiving funds under the initial competition are required to submit annual renewal plans and negotiate program budgets each year. By federal law, eligible providers are prohibited from using federal grant funds to supplant state or local dollars.

The State office provides technical support to local providers in aligning programs with local workforce needs and addressing existing skills gaps. Partnerships with local workforce boards, local departments of labor, and community-based organizations are fundamental to the success of Adult Education programs in Idaho. Integrated Education and Civics Education and Integrated Education and Training programs are delivered in collaboration with community partners; local programs are encouraged to build partnerships to provide wraparound support services for students in their AEFLA funded programs.

The competitive application process requires applicants to document their qualifications per each of the thirteen considerations set forth in Section 231(e). Information is collected via a State-issued Request for Grant Applications (RFGA). The information collected from each applicant in the RFGA may include, but is not limited to:

Documentation of eligibility per Section 203(5)

The state of Idaho will select a committee to screen each application to determine if it is an eligible provider of demonstrated effectiveness before the application is reviewed, scored, and considered for funding. A meeting between the Idaho State Program Director and this committee will clarify the distinction between evaluating an application for demonstrated effectiveness and considering an eligible provider's past effectiveness in considering an application for funding. The first step for this committee is to determine the eligibility of the applicants. Only those applicants that have demonstrated effectiveness in providing adult education and literacy services is eligible to apply for AEFLA funds. Applicants that are determined to be ineligible for funding because they were not determined to be eligible providers of demonstrated effectiveness will be notified.

How demonstrated effectiveness is established:

1. An eligible provider that has been funded under Title II of the Act must provide performance data required under section 116 to demonstrate past effectiveness by providing data on its record of improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy, in the content domains of reading, writing, mathematics, and English language acquisition - and other subject areas relevant to the services contained in the state's application for funds.

2. An eligible provider must also provide information regarding its outcomes for participants related to: employment, attainment of secondary school diploma or its recognized equivalent, and transition to postsecondary education and training.

Eligibility will be based upon a 'yes'/'no' determination where:

Yes Indicates the applicant has submitted previous two year's worth of data demonstrating effectiveness in the areas shown below and met a minimum of an overall 15% achievement on Measureable Skill Gains:

- Academic level gains in the content areas of reading, writing, mathematics, and English as a Second Language
- Employment outcomes
- Attainment of Secondary School Diploma or its recognized equivalent.
- Transitions to Post-secondary Education/Training

Applications which meet the above criteria will have demonstrated effectiveness and will pass the pre-screening process.

No Indicates the applicant has not demonstrated effectiveness in serving eligible individuals. Grant applicant will not be forwarded to committees for considerations in funding.

Applications that meet the '**Demonstrated Effectiveness'** requirement will be reviewed, scored and considered for funding. Applications that do not result in a determination of demonstrated effectiveness will not be further considered for funding and will be notified within two weeks of submission by letter.

The Idaho Division of Career & Technical Education distributes funds awarded under Title II, as set forth in WIOA Section 222(a). The State distributes funds at:

1. Not less than 82.5% of the grand funds to award grants and contracts under Section 231 (Eligible Providers) and to carry out section 225 (Programs for Correctional and Institutionalized individuals), of which not more than 20% of such amount shall be available to carry out section 225.

2. Not more than 12.5% of the grant funds to carry out State leadership activities under section 223; and

3. Not more than 5% of the grant funds or $85,000, whichever is the greater, for the administrative expenses of the eligible agency (the State).

Type of Adult Education Program(s) and/or Activities to be funded, limited to those activities allowed in Title II of WIOA and set forth in this plan

Section 243 Integrated Education and Civics Education: A service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement. In order for a program receiving funds under Title II of such activities, they must allow students to access all three components concurrently.

Section 225 Corrections Education: Correctional programs may use funds to carry out activities as authorized under Section 225, including: 1. Adult Education and Literacy (as defined in part (b) above) 2. Special education, as determined by the eligible state agency administering the grant 3. Secondary school credit 4. Integrated education and training 5. Career pathways 6. Concurrent enrollment 7. Peer tutoring and 8. Transition to re-entry initiatives and other post-release services with the goal of reducing recidivism.

Section 231 Regional Adult Education and Literacy Programs:

- *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*

Alignment with Idaho's Combined State Plan including state strategies and goals, career pathways, and local one-stop alignment. Strategic planning occurred between partners in the Combined State Plan. Representatives from these programs work in close collaboration through a series of meetings and discussion organized through the Workforce Development Council and the One-Stop Committee. AEFLA activities throughout Idaho plan career pathways that are in-demand with multiple access points and with opportunities to earn stackable credentials. The goals and objectives for recipients of Title II funds includes creating educational and workforce access to sustainable careers. In order to promote consistency and alignment, the Workforce Development Council reviews all approved applications and makes recommendations to alignment for all workforce and workforce preparation activities. Ideally, IET's are a launching pad for moving students into Registered Apprenticeships for continued short-term or long-term training.

Administrative capacity such as: organizational structure, funding streams, financial oversight, data collection and reporting, and assurances. The state of Idaho ensures that the structure of all recipients are set up to manage each funding stream they receive with qualified accountants and fiscal managers to provide financial oversight and to manage the drawdown process and provide monthly balance ledgers to program directors. As the state moved to a new management information system, LACES with LiteracyPro, both virtual and on-site trainings will be provided. The new MIS will provide more accurate and up-to-date data than the prior MIS. Therefore, FY22 will provide a baseline to provide a more in-depth qualitative and quantitative summary for reporting purposes.

Operational capacity such as description of qualified staff and hiring processes, available locations and classroom space, community partnerships, and number of Title II-eligible students served per year. Each provider will be required to track the qualifications of their support and instructional staffs. The hiring processes are outlined in their agency's policies for both classified and non-classified employees. The full time instructional staff either have a bachelor's or a master's. Part-time staff and support staff may possess AA or AAS degrees through a master's and certifications that align with their position. Each funded program will work with and participate on Technical Advisory Committees to connect the region's services especially the WIOA partners. The goal is to offer seamless services with warm hand-offs of clients. Idaho will typically serve between 5,000 and 6,000 students annually - the pandemic has cut these

numbers in half. Each provider will have sufficient classroom space for ABE, AE, IELCE/IET programs. Additional classrooms that may be needed will be provided through local community partnerships.

Quality of Services such as proposed class schedules, description of curriculum and alignment with state-adopted standards, and professional development/training activities. Idaho's AEFLA programs will provide day, afternoon, evening, distance learning, and hybrid courses to accommodate the variety of learners that programs serve. All learners will be taught using the College and Career Readiness Standards and the English Language Proficiency standards. Curriculum is rooted in science-based researched best practices. The state will hold professional development opportunities for new and veteran teachers to deepen their understanding and application of the standards.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

The Idaho Division of Career & Technical Education uses no more than 20% of funds awarded to eligible providers to support programs under section 225 for incarcerated and institutionalized individuals. Grant funds are awarded to an eligible provider that offers applicable services to incarcerated or institutionalized individuals. Funds are awarded using a competitive application process outlined in part (b (i)) above, after which, providers may request funds on an annual basis through an extension application.

The State requires that any eligible provider using Title II funds to carry out programs authorized under section 225, give priority to those offenders who are likely to leave the correctional institution within five years of participation in the program.

Correctional programs may use funds to carry out activities as authorized under Section 225, including:

1. Adult Education and Literacy (as defined in part (b) above)
2. Special education, as determined by the eligible state agency administering the grant
3. Secondary school credit
4. Integrated education and training
5. Career pathways
6. Concurrent enrollment
7. Peer tutoring and
8. Transition to re-entry initiatives and other post-release services with the goal of reducing recidivism.

The type of activities offered by correctional service providers depends on the needs of the populations being served. Programs are expected to provide those activities, which are appropriate to meet the needs of the populations in their facility. For example, short-term facilities (such as county jails) should prioritize activities that can have a meaningful impact in a short amount of time and help meet a student's re-entry needs. Longer-term facilities (such as state prisons) may choose to focus on longer, more intensive education programs for students who will be incarcerated for multiple years.

When submitting applications for funds to support activities authorized under Section 225, applicants are required to provide rationale for each activity for which funds are requested, including data that demonstrates a need for the activity in their facility.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

Idaho's IELCE programs will provide ELA standards driven, evidence-based instruction in reading, writing, speaking and understanding English an civics education to all English language learners - including professionals with degrees and credentials in their native countries. Student desiring citizenship will acquire an understanding of what it means to be a citizen and to participate in civics responsibilities. IELCE may include workforce training. Through collaboration with the local workforce development council and WIOA partners and alignment with the combined state plan, IECLE programs will assist English Language learners with career goals by offering IELCE education concurrently with integrated education and training as part of a career pathway. IET's will focus in in-demand occupations that lead to economic self-sufficiency. All stakeholders in the development of pathways will have input into the contextualized curriculum and to the single set of objectives and goals. Workforce partners will provide technical assistance when determining the most in-demand jobs and what those pathways make look like. English language learners seeking IELCE, but not seeking workforce training, may still participate in the IELCE IET services to assist them in identifying a chosen career pathway. In some cases, IELCE IET students will have access to job shadowing and hands-on experiences through partnerships with technical schools. Students will have the opportunity to ask questions and see first hand what a career looks like in real time.

Through the IECLE programs, students will achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. he ELA standards drive instruction to serve students who desire to improve their language skills to better function in their environments as parents and patrons of the local communities.

In Idaho, Integrated English Literacy and Civics Education (IELCE) funds are awarded to eligible providers through a competitive application process for multi-year grants, outlined in part (b(i)). After providers receive funds through the competitive process, they may request continuing funds on an annual basis through a renewal application. Funds are used to support the operational expenses of local IELCE programs, including teacher salaries and benefits, classroom supplies, textbooks, and other items necessary to carry out instruction. The State collaborates with local providers to build on existing best practices while expanding and/or implementing new workplace training components, as necessary.

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

The State distributes no more than 12.5% of Title II funds allocated to the state to carry out required and permissible leadership activities, as required under Section 223. While the state reserves the right to carry out any of the permissible activities authorized under Section 223, the permissible activities listed below will be the primary focus.

Required activities supported with Leadership funds:

· Align adult education and literacy activities with other core programs and one-stop partners, including eligible providers, to develop career pathways and provide access to employment and training services for individuals in adult education and literacy activities.

· Establish or operate high-quality professional development programs to improve the instruction provided pursuant to local activities, including instruction incorporating the essential components of reading instruction as such components relate to adults, instruction related to the specific needs of adult learners, instruction provided by volunteers or by

personnel; and disseminate information about models and promising practices related to such professional development programs.

· Provide technical assistance to eligible providers including the dissemination of instructional and programmatic practices based on research, the role of eligible providers as one-stop partners, and the use of technology to improve system efficiencies.

· Monitor and evaluate the quality of, and improvement in, adult education and literacy activities, and disseminate information about models and proven or promising practices within the State.

Permissible activities supported with Leadership funds:

· Develop and disseminate curricula, including curricula incorporating the essential components of reading instruction as such component relate to adults

· Develop content models for integrated education and training and career pathways.

· Provide technical assistance regarding the use of data to measure the progress of programs, evaluate program effectiveness, and guide program improvement, especially as such data relates to the State's adjusted levels of performance described in section 116.

· Develop and implement transition programs, including linkages with postsecondary education institutions

· Integrate literacy and English language instruction with occupational skill training, including linkages with employers

· Develop and pilot strategies for improving teacher quality and retention.

Alignment with Other Core Programs

Two key strategies for program alignment, as identified in Idaho's Combined State Plan, Section (II)(c)(2), supports this requirement. The first is to establish a WIOA Advisory Group comprising key state-level staff from each of the programs covered by the plan. The purpose of the WIOA Advisory Group is to coordinate operational policies and partnerships at the state level between programs covered under the Combined State Plan. The WIOA Advisory Group will work with regional coordinating groups and with local programs to ensure consistency in the application of program policy throughout the state and to help local programs overcome operational and policy-related barriers to full collaboration.

The State Program Director for Adult Education is a member of this group and will provide technical assistance to local Title II providers as needed. Leadership funds may be used, as appropriate and allowable, to support local staff in attending any training or meetings hosted by the State to provide such technical assistance to local staff and leadership.

The second strategy identified in Idaho's Combined State Plan is to coordinate training across workforce programs to enhance opportunities for professional growth and development. This might include, for example, inviting local Vocational Rehabilitation staff to training on adult learning styles, or inviting local Adult Education staff to training by Wagner-Peyser/Employment Service staff on the use of Idaho's Career Information System to help students identify potential careers. Title II Leadership funds may be used, as appropriate and allowable, to support Adult Education program staff in attending such training.

High Quality Professional Development Programs

Given Idaho's large geography and relatively small population, local Adult Education programs have historically been spread far apart. As a result, it is expensive and time consuming for local staff to travel to centralized training. The State has therefore designed a three-tiered approach

to professional development in Idaho. The first tier is state-level training, the second is local routine/required training, and the third is local discretionary training. All levels of training are supported with State Leadership funds under section 223.

State-level training, while not mandatory, is highly encouraged for all programs. The State generally chooses one or two such training options per year, these trainings will be centrally located and host a larger cohort of participants (20-30). These trainings will focus on instructional topics or practices, which will have the greatest impact for the most number of attendees across the state. In the past, this has included nationally recognized trainings like the Adult Numeracy Institute. To the extent that it is feasible, the State will prioritize trainings that use a model of sustained contact between trainers and a cohort of teachers throughout the year. This may include multiple in-person meetings, online discussion groups, and opportunities to try new practices in the classroom between meetings. However, the exact model of such trainings will depend on the needs and resources identified in the State each year.

More routine and required training, such as new teacher onboarding, training on the NRS and data collection, and assessment training, have been, and will continue to be handled locally. Under WIA, each program identified a staff member or members to serve as expert trainers, and employed a professional- development coordinator to track training needs and participation. This model has worked well, and will continue under WIOA. The State will provide guidance on the frequency and content of such local training and will host refresher trainings for these local trainers and PD coordinators as appropriate. The State may also explore options that allow programs to collaborate on such trainings, as well as tools that will help centralize the development and storage of training materials for use by multiple programs.

Finally, local programs can also apply for discretionary funds to support local professional development projects. Such projects should be aligned with local needs and supported with evidence. For example, a local provider may determine through teacher evaluation and observation that training on the use of contextualized reading would help improve instructional quality at its outreach centers. The program would then create a training plan and request funds from the State to support this plan.

Technical Assistance

The State provides technical assistance, as appropriate, based on the needs and performance of local providers. Such assistance may be provided directly to one program, or may be provided for the entire state. Such assistance may include:

· Technical assistance for establishing transition programs, team teaching, and other areas where Adult Education programs connect with other core and partner programs and the One-Stops

· Guidance from WIOA Advisory Group to ensure policy alignment between programs, training and technical assistance on these policies and their impact on programs

· Training as needed or requested to address new and relevant technology in the classroom

Monitoring and Evaluation

The State will use a variety of methods to monitor and evaluate the quality of adult education and literacy activities. Such methods will include on-site monitoring, quarterly desk audits, continuous data-quality monitoring, annual program plans, and annual reports.

The State will make every reasonable attempt to conduct an on-site monitoring visit to each local provider at least once every three years. Such visits may occur more frequently if warranted by program performance or compliance issues, or if requested by a program. Monitoring will include a review of processes, practices and documentation related to program

finances, administration, data collection, and instruction. A complete monitoring tool will be developed by the State to facilitate such visits and ensure consistency across programs.

Programs will also be evaluated based on regular submission of reports, applications, and program plans to the State. The State will monitor program data-quality through the use of the State's Management Information System. Technical assistance will be provided on an ongoing, as-needed basis regarding compliance, program quality, and data quality. Leadership funds will be used to support training and other activities resulting from such evaluations. Programs that are found to be out of compliance with State or Federal policies or law, or which have demonstrated unacceptable administrative practices or consistently low performance will be subject to a Corrective Action Plan. "Consistently low performance" will be determined based on actual performance against program indicators, the extent to which state targets are met, past performance of the program, the relative performance of other providers, and mitigating program circumstances. Programs which fail to implement a Corrective Action Plan as determined necessary by the State may be subject to loss of funds.

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

- Develop and disseminate curricula, including curricula incorporating the essential components of reading instruction as such component relate to adults
- Develop content models for integrated education and training and career pathways.
- Provide technical assistance regarding the use of data to measure the progress of programs, evaluate program effectiveness, and guide program improvement, especially as such data relates to the State's adjusted levels of performance described in section 116.
- Develop and implement transition programs, including linkages with postsecondary education institutions
- Integrate literacy and English language instruction with occupational skill training, including linkages with employers
- Develop and pilot strategies for improving teacher quality and retention.
- Infrastructure costs such as dissemination of WIOA partnerships to key stakeholders.
- Infrastructure costs related to signage.

F. ASSESSING QUALITY

The State assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Local providers are accountable to the State to meet the standards of quality for administration and instruction outlined in the competitive grant application, certifications, assurances, and state policy. The effectiveness and quality of local providers is assessed through the use of performance data aligned with the indicators of performance set forth in WIOA Section 116, as well as the evaluation and monitoring processes described in part (e) above. The state will take certain actions to improve program quality:

1. Quarterly desk audits are required and each provider will be given feedback from the state. Accomplishments will be noted and concerns will require actions on behalf of the provide to remedy the concern. The state will provide support in remedying any concerns. 2. Biweekly director meetings will be held to discuss appropriate actions to improve the quality of programs. 3. Program improvement plans may be utilized and progress of the components of these plans will be addressed in each quarterly desk audit. 4. Site visits as needed in addition to

the scheduled site monitoring visits. 5. Data quality training with the new LACES system as needed. 6. Analysis of professional development needs will be conducted and the alignment of leadership funds to address these needs will follow. These actions along with other actions that may need to be included throughout the program year are all designed to improve program quality.

Assessment of Program Quality

Core programs collectively report on the six performance indicators set forth in Section 116 of WIOA and pursuant to federal regulations and guidance. These six indicators are:

1. The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program;

2. The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program;

3. The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program;

4. The percentage of program participants who obtain either a recognized postsecondary credential or a secondary school diploma, or its equivalent, during participation in or within one year of exit from the program

5. The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are

achieving measurable skill gains towards such a credential or employment; and

6. The indicators of effectiveness in serving employers established pursuant to clause (iv).

Every two years, the State is required to negotiate the above-defined targets with the US Department of Education for the upcoming program year (July 1 – June 30). Local programs are be expected to meet or exceed the state targets and report on their performance in an annual report submitted to the State.

Data collection and analysis

In order to determine the levels of performance under each of the indicators listed above, local programs are required to collect data through a standard collection process (including standardized assessments), input data into the statewide Management Information System on a regular basis, and analyze data for the purpose of performance reporting and program improvement. Programs must adhere to all state and federal policies when collecting student data.

Programs are expected to use this data to determine progress toward meeting the State targets. Programs are also expected to use such data to evaluate program effectiveness and align program improvement efforts.

Program Improvement

In the case that a provider has consistently low success in achieving the negotiated levels of performance, the State may require the program to implement a Program Improvement Plan. To the extent that such a plan includes professional development and training, allocable costs of such training may be provided for with state leadership funds under section 223.

Assessing Professional Development

The State has a vital interest in assessing the quality of programs funded under Title II, and in providing adequate professional development and technical assistance to those programs in order to ensure continuous improvement. To that end, the State currently implements certain measures to assess its professional development activities. These measures are outlined:

· **Professional Development Coordinators**: Each local program is required to identify a staff person to identify local training needs, organize and implement local training, track staff attendance at both state and local trainings, collect training evaluations, and provide an annual report to the State regarding the program's professional development activities. The State will support the time spent on these activities through Leadership funds.

· **On-site Evaluations**: All statewide training and professional development shall include evaluation forms to solicit feedback from participants about their experience, what they learned, what was effective, what could be improved, and what they are likely to implement when they return to their local program. The State will review this feedback and make adjustments as needed.

· **Follow-up Evaluations**: To the extent that such follow-up is appropriate and feasible, the State will ask for follow-up evaluations from participants of statewide trainings three months after the conclusion of the event to assess whether practices have been implemented and sustained.

· **Ongoing Performance Review**: Both the State and local programs will review performance data on a regular and ongoing basis. Such review will take into account federal reporting tables, student outcomes, attendance, measurable skill gains, and other factors. This review will occur regularly, but at a minimum must occur each quarter. The information gained from these performance reviews will help the State and local programs identify areas that are improving and those areas which demonstrate gaps or a decline in performance.

The results of the above assessment activities will be used when considering the effectiveness of past professional development. These results will also inform future training and the types of professional development activities the State will offer or require.

In addition to the activities listed above, Idaho will take a special focus on using section 223 funds to ensure adult education students have access to the created and updated career pathways that technical colleges use. In some cases, to meet the specific hiring gaps within a sub-recipient region, career pathways in partnership with the local agencies and organizations may be necessitated. In such cases, workplace requirements and adult education requirements will be detailed in these plans. Simultaneously, sub-recipients will be using program and instructional best practices to identify needed skills for students to transfer to the workforce and post-secondary institutions. These best practices will be discussed in bi-weekly meetings with the Adult Education State Program Director and be used to identify program and/or instructional areas of need. Reading instruction will be rooted in research and instructional standards. Proven instructional models will be a part of state directors meetings which are held throughout the program year. Technical assistance will always be available to programs struggling to meet performance measures.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS

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	Yes

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

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM ASSURANCES

The State Plan must include	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	Yes

The State Plan must include	Include
participation in the program.	
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

APPLICANT'S ORGANIZATION	**Enter information in this column**
Applicant's Organization	Idaho Career & Technical Education
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	**Enter information in this column**
First Name	Clay
Last Name	Long
Title	Administrator, Idaho Career & Technical Education
Email	clay.long@cte.idaho.gov

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

The State of Idaho requires all AEFLA funded programs to sign a Section 427 GEPA Attestation form as part of the grant renewal application. The attestation includes a narrative of the steps that will be taken locally to comply with the GEPA requirements. The purpose of this requirement is to assist the United States Department of Education in implementing its mission to ensure equal access to education and to promote educational excellence.

The Idaho AEFLA State Office will take necessary steps to ensure equitable access to, and participation in, all activities funded through federal dollars including professional development and technical assistance. To do so, the state office will identify any special needs of its target audience and provide accessible formats of written documents and provide options for virtual and in-person events to ensure full participation of attendees. In addition, the State will ensure all opportunities for employment and participation in programs is open to anyone, regardless of gender, race, national origin, color, disability, or age. The goal of Idaho is to ensure equitable access to resources so that staff, local providers, and students can reach their full potential. Professional development and trainings for local providers and their staff will be recorded and archived for those who otherwise could not attend an event.

ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	43.0	35.0	55.0	37.0
Employment	37.0	36.0	45.0	37.0

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
(Fourth Quarter After Exit)				
Median Earnings (Second Quarter After Exit)	4,500.0	4,900.0	4,600.0	5,200.0
Credential Attainment Rate	43.0	43.0	45.0	45.0
Measurable Skill Gains	30.0	29.0	40.0	31.0
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (COMBINED OR GENERAL)

A. INPUT OF STATE REHABILITATION COUNCIL

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

The responsibilities of the Idaho State Rehabilitation Council (SRC) are outlined in the Rehabilitation Act of 1973, as amended.

The SRC and IDVR changed the input period from a calendar year to a program year with this State Plan, to better align with the VR program reporting period.

The SRC's input during PYs 2019 and 2020 can be summarized within three broad areas: 1) strategic planning and manual input; 2) survey input; and 3) collaborative reporting.

Furthermore, IDVR engaged with the SRC on the 2022-2023 draft modification of the State Plan in January 2022 including a review of the state plan elements and the recommended goals and priorities of the Division at the January 2022 SRC quarterly meeting. SRC feedback was supportive of IDVR strategies addressing recruitment and retention challenges, efforts to further align and leverage the workforce development system, and the development of a VR Counselor position for the deaf and hard of hearing. Other grammatical feedback was provided and accepted by the Division.

Following SRC review of the 2022-2023 draft plan, the Council participated in a Strategic Planning and Prioritization session held in March 2022. This session further addressed SRC interests including:

- CRP improvement activities
- Comprehensive services to individuals with MSD

- Expanding partnerships
- Pre-ETS expansion and improvement
- Recruitment and retention issues
- Services to business/Business relations coordination

A period of public comment was held January 18, 2022, through February 11, 2022, including two statewide calls held February 3, 2022. SRC recommendations were incorporated into the final version of this plan where applicable.

1. **Business Engagement**

SRC Input

The SRC members, particularly those members who represent business, industry, and labor, participated in a strategic planning process with the Business Engagement Team (BET) and other VR staff to develop a Business Engagement strategic plan. During our next quarterly meeting, after the planning process, the IDVR Deputy Administrator reviewed a Business Engagement Strategic Planning summary document and asked the SRC to provide feedback and comments. An SRC member commented that the focus on employers and how VR can benefit employers is a positive and effective message in the strategic planning goals. The outcome of the relationship benefiting VR customers

2. **Field Services Policy Manual**

SRC Input

The current Field Services Policy Manual (FSPM) is no longer a document referenced in IDAPA rule. Yet, according to the 34 CFR 361.20 public comment is required when IDVR makes substantive changes to policy. Due to changes, which were considered substantive, a period of public comment on the draft FSPM occurred, which included phone sessions, emails to stakeholders, posted notices in IDVR offices, as well as posted on the external website. SRC members extensively reviewed the draft FSPM prior to it being finalized and posted on the IDVR website. In addition to identifying minor grammar and formatting issues, the SRC policy sub-committee members recommended that IDVR add Code of Federal Regulation (CFR) citations to all major policy sections. It was also recommended that IDVR make changes to the closure policy to increase readability and clarity.

3. **Customer Access to Services During COVID-19 Survey**

SRC Input

IDVR sent out 3,500 surveys (paper and electronic) to current customers with a 18% response rate. The results indicate that 92% of customers have access to their VR Counselor. Those indicating lack of access to service cited a fear of COVID-19 and technology challenges. Moreover, 85% of the respondents stated they can access services they needed to move forward with their employment plans, with 50% affirmed they can access employment opportunities. SRC members wondered if the respondents self-identified, so there could be outreach back to them if they cited needs. They also posed the idea of using other mechanisms to distribute the survey beyond a letter such as phone calls or text messages, to increase response rates.

4. **Comprehensive Statewide Needs Assessment**

SRC Input

Previously, IDVR and SRC re-designed the CSNA surveys, and these survey results informed State Plan goals and priorities. Additionally, the SRC reviewed the CSNA report and prioritized

elements based upon those areas which are important to the SRC members. SRC members are most concerned with improving the quality of services provided by CRPs, staff retention and turnover which impacts quality service delivery, increase outreach, continue to expand and improve Pre-ETS.

5. **State Plan**

SRC Input

In the January 2020 SRC quarterly meeting, IDVR presented emerging goals and priorities resulting from the current draft CSNA to the SRC at large, compared to previous VR State Plan goals and priorities. The SRC agreed that these were relevant and important goals and priorities and that they remained consistent with the previous state plan and strategic plan goals. In February 2020, several members of the SRC participated in a strategic planning in session with IDVR management staff to jointly develop the goals and priorities for the Division, which would be included in the VR Portion of the State Plan.

The SRC Vice Chair reviewed the entire VR Portion of the Combined State Plan and acknowledged agreement with the goals and priorities.

Furthermore, SRC input into the 2022-2023 draft modification of the State Plan was solicited alongside the public comment period. SRC recommendations have been incorporated into the final version of this plan where applicable.

6. **Annual Report**

SRC Input

The SRC Annual Report is a collaborative effort between the SRC and IDVR. The format and content design are an ongoing discussion for several months. This is followed by a group effort of writing and edits with contribution from several members. The last 2 years Annual Reports included a COVID-19 focus with narratives and data weighing heavily on everyone's minds.

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

During PYs 2019-2020 the SRC provided input and recommendations to IDVR on a variety of subjects. IDVR agreed with and or adopted all but one suggestion provided by the SRC. The following summarizes IDVRs responses to that input and recommendations.

IDVR Responses

1. **Business Engagement**

IDVR appreciates the involvement of the SRC members in the Business Engagement strategic planning process. Furthermore, the Division agrees that focusing on employers and how VR can be of benefit to them is important and a priority for the Division.

2. **Field Services Policy Manual**

The Division agrees with the SRCS policy related suggestions to include the CFR citations to all major policy sections and making changes to the closure policy for improved readability and clarity.

3. **Customer Access to Services During COVID-19 Survey**

The Division was not able to act upon all of the SRC's recommendations, particularly conducting telephone or text surveys to improve the response rate for the COVID-19 Access to Services

survey. The SRC discussed the feasibility of making contact with customers via phone or text message to increase responses. The Division did evaluate and consider the possibility of this action; however, it was determined that the Division currently lacked the human resources to engage in this strategy, primarily due to high staff turnover/vacancies and the additional challenges of virtual service delivery (COVID).

4. **Comprehensive Statewide Needs Assessment**

The Division agrees with the SRCs concerns and has already or will prioritize the following: improving the quality of services provided by CRPs, staff retention and turnover which impacts quality service delivery, increase outreach, continue to expand and improve Pre-ETS. These are already current priorities of the Division and will be included, if not already, in the Division's Strategic Plan and the State Plan as goals and/or priorities.

The Division continues to engage the SRC in identifying emerging goals and priorities for the Division. Their voice and engagement provide valuable input necessary to keep the Division focused on relevant and important activities to improve the employment of individuals served by the Division.

5. **VR Services Portion of the Combined State Plan**

The Division appreciates the dedication and involvement of the SRC Vice Chair and other members who take the time to understand the goals and priorities of the Division. SRC input into the 2022-2023 draft modification of the State Plan have been incorporated into the final version of this plan where applicable. While not all SRC input was germane to this state plan, all themes were retained for a strategic plan and prioritization discussion to be held March 10, 2022. The annual strategic planning and prioritization discussion brings together IDVR administration, Central Office program managers, Regional Managers, and representatives of the SRC.

SRC feedback was supportive of IDVR strategies addressing recruitment and retention challenges, efforts to further align and leverage the workforce development system, and the development of a position for the deaf and hard of hearing.

Following SRC review of the latest draft plan, the Council included topics and suggestions which will be directly addressed at the March 10 session including:

- CRP improvement activities
- Comprehensive services to individuals with MSD
- Expanding partnerships
- Pre-ETS expansion and improvement
- Recruitment and retention issues
- Services to business/Business relations coordination

Annual Report

The Division appreciates and values the contributions of the SRC members in preparing the Annual Report. The Division believes the report has seen steady improvements because of their suggestions and involvement.

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

The Division was not able to act upon all of the SRC's recommendations, particularly conducting telephone or text surveys to improve the response rate for the COVID-19 Access to Services

survey. The SRC discussed the feasibility of making contact with customers via phone or text message to increase responses. The Division did evaluate and consider the possibility of this action; however, it was determined that the Division currently lacked the human resources to engage in this strategy, primarily due to high staff turnover/vacancies and the additional challenges of virtual service delivery (COVID).

B. REQUEST FOR WAIVER OF STATEWIDENESS

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

Waiver of Statewideness

IDVR is requesting waivers of statewideness for cooperative agreements with:

1. Various Local Education Agencies (LEAs) across Idaho and
2. Idaho Department of Correction (IDOC).

All funds made available to IDVR across these agreements are certified non-federal funds.

Note: IDVR utilizes the last completed SFY/PY for projection estimates. SY2021/PY2020 data is the most current completed year available to report.

Local Educational Agency Agreements:

IDVR currently has 11 School to Work Transition (SWT) cooperative agreements serving 50 of the 175 total LEAs across Idaho. These cooperative agreements are solely to facilitate the transition of students with disabilities from K-12 public education into adult life. This transition to adult life may involve any or all of the following goal-oriented activities: post-secondary education, training and job placement, direct placement into appropriate employment (to include supported employment if required), advocacy and any other activities that are relevant to the student and within the scope of IDVR's mission and role. Additionally, IDVR agrees to collaborate with LEAs to provide or arrange for the provision of pre-employment transition services for eligible and potentially eligible students with disabilities who need these services in accordance with 34 CFR 361.48.

Each signed individual agreement with participating LEAs provides for certified non-federal matching funds and further stipulates that IDVR will not provide pre-employment transition services that the school customarily provides under IDEA.

These agreements promote better understanding and convenient access to VR services, including pre-employment transition services, to qualifying students offered through School to Work Transition, but do not expand the scope of services available statewide (e.g. all services provided under these agreements are available statewide for all students, regardless of the presence of an LEA agreement). The services offered under these agreements include:

- Job exploration counseling
- Work-based learning experiences
- Counseling on opportunities for enrollment in postsecondary educational programs at institutions of higher education
- Workplace readiness training and
- Instruction in self-advocacy
- All other traditional VR services

These agreements are revised and renewed on an annual basis.

These agreements increase outreach through stronger relationships between the LEA, VR, and individuals with disabilities promoted by a better understanding of services by LEAs where agreements are in place. Enhanced relationships between all parties to the agreement promote an informed transition to traditional VR services and the opportunity for potentially eligible students to participate in Pre-ETS. There are a growing number of students being served under these agreements with a 21.22% increase in PY20 to 1485 students, and participating students are utilizing a greater array of services with 110 fund expenditures rising from $804,270 in PY19 to $1,815,717 in PY20.

All state plan requirements, including a state's Order of Selection, apply to all services provided under these cooperative agreements.

Data for each of these 11 agreements are included in the following table, including the LEAs, number of students served, receipt of non-federal funds and VR 110 grant funds (not including match funds). IDVR utilizes the last completed SFY/PY for projection estimates.

Agreement	Students Served (PRE & VR)	Non-Federal Funds Captured	VR 110 Funds Expended
Region 1 Agreement with LEAs: #271, #273	69	$18,522	$181,158.55
Region 1 Agreement with LEAs: #83, #84, #101, #272	89	$18,522	$60,266.83
Region 2 Agreement with LEA: Lewiston Independent School Dist. #1	35	$18,522	$78,244.29
Region 3 Agreement #1 with LEA: Boise Independent School Dist. # 1	132	$18,522	$117,275.17
Region 3 Agreement #2 with LEA: West Ada School Dist. #2	156	$37,044	$136,578.37
Region 3 Agreement #3 with LEA: Nampa School Dist#131	108	$18,522	$121,363.97
Region 3 Agreement #4 with LEAs: #133-137, #221, #363, #370, #372, #373	102	$18,522	$91,366.44
Region 4 Agreement with LEAs: #61, #234, #121, #151, #314, #231, #232, #233, #261, #331, #418, #316, #312, #465	225	$18,522	$246,682.15

Agreement	Students Served (PRE & VR)	Non-Federal Funds Captured	VR 110 Funds Expended
Region 5 Agreement #1 with LEAs: #25, #52, #55, #58, #381	314	$18,522	$485,513.01
Region 5 Agreement #2 with LEAs: #33, #148, #351, #21, #149, #150, #201, #202	63	$18,522	$37,866.27
Region 6 Agreement with LEAs: #59, #60, #91, #93, #251, #252	192	$18,522	$259,402.28
Totals:	**1485**	**$222,264**	**$1,815,717.33**

Idaho Department of Correction (IDOC) agreements:

IDVR has also entered into two cooperative agreements with the Idaho Department of Correction (IDOC) which cover six of the seven IDOC Districts in Idaho, excluding IDOC District 2. The purpose of these agreements is to provide comprehensive Vocational Rehabilitation (VR) services to eligible offenders with disabilities leaving the prison system that have been identified as at risk for recidivism, thus needing more intensive reentry services to promote post-incarceration stability including stable employment.

These agreements promote better understanding and convenient access to VR staff and services to promote the reentry of the offenders into society, with an emphasis on stability and employment. All relevant VR services may be provided, depending upon the need of the individual. The scope of services provided under these agreements may include:

- Vocational Rehabilitation Counseling and Guidance
- Assessment
- Diagnosis and Treatment
- Training services to include, graduate, 4-year college, junior or community college, occupational or vocational, on-the-job, job readiness, miscellaneous, registered apprentice, basic academic remedial or literacy and disability related training
- Information and Referral
- Short-Term Job Supports
- Job Search and Placement Assistance
- Supported and Customized Employment
- Benefits Counseling
- Rehabilitation Technology
- Personal Assistance and Technical Assistance Services Including Self-Employment
- Reader and Interpreter Services
- Extended Services, if applicable and individual meets the eligibility criteria to receive such services

- Supportive services to include, maintenance and transportation
- Other Services

All state plan requirements, including a state's Order of Selection, will apply to all services provided under these cooperative agreements. Both agreements are revised and renewed on an annual basis.

All funds allotted to IDVR via these IDOC agreements are certified non-federal funds. Both signed agreements provide this assurance.

1. IDOC Agreement 1 $65,607 (Region 1 and 5)
2. IDOC Agreement 2 $116,029 (Regions 3, 4, 6, 7)

The total receipt of certified non-federal funds from IDOC is anticipated to be $181,636 for SY 2022. The total number of individuals served in SY2021/PY2020 by both agreements was 693 individuals with disabilities. The Division expended $160,756 VR 110 grant funds (not including the above listed match funds). The Division anticipates similar projections for the number of individuals services and funds expended in SY2021/PY2020 per these agreements. The Division expended $342,734.89 in total for this population in SY2021.

Note: IDVR utilizes the last completed SFY/PY for projection estimates. SY2021/PY2020 data is the most current completed year available to report.

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

IDVR will approve each proposed service prior to it being provided.

3. REQUIREMENTS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN WILL APPLY TO THE SERVICES APPROVED UNDER THE WAIVER.

All State plan requirements, including order of selection requirements, will apply to all of the cooperative agreements with Local Education Agencies (LEAs) across Idaho and with the Idaho Department of Correction (IDOC).

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

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

The Idaho Division of Vocational Rehabilitation (IDVR) and the following entities have entered into or are developing formal agreements with programs to outline and explain the collaborative relationship between the program and IDVR. The agreements outline some or all of the following: goals, planning processes, information sharing and confidentiality, technology, accountability, service delivery support, cost sharing, annual action plans, duration, amendments, and termination/conflict resolution, when applicable.

The cooperative agreements with agencies mentioned in this section of the state plan were created to allow for more efficient service delivery to those populations under each cooperative agreement. They have allowed for more efficient referral, eligibility determination and collaborative service provision. Customers have benefited from these cooperative agreements because of the well-established relationships and improved understanding of cross program requirements. Customers also receive more effective referral and expedited service provision because of the established agreements.

IDVR's case management system collects outcome data for individuals served under many of these agreements. The Division has yet to analyze this information for program improvement purposes.

IDVR has the following cooperative agreements:

Idaho Industrial Commission (IIC): This agreement outlines the relationship between IDVR and the IIC with regard to persons injured on the job who may also have other non-work-related injuries. The Industrial Commission will be the lead Agency for injured workers in Idaho and will refer them to IDVR when they are unable to return to previous or similar employment due to the work-related injury.

The cooperative agreement with the Idaho Industrial Commission benefits customers who have experienced an industrial injury, covered by worker's compensation law. Customers benefit in terms of access and service provision because of the well-developed relationships fostered by this agreement. Customer receipt of services is generally faster and more streamlined because program staff have strong working relationships and an understanding the requirements of each program.

IDVR has had a long-standing agreement with the Idaho Industrial Commission (IIC). The agreement describes the purpose, responsibilities, and referral process for customer who are industrially injured workers covered by the Idaho Workers' Compensation Law. The Division does not track IIC referrals.

The agreement with Idaho Industrial Commission has been updated as of April 2022 and includes referral procedures for both ICRD and IDVR. Referrals to the Industrial Commission are contingent on application for benefits under Idaho Workers' Compensation Law. Co-enrollment may be indicated where rehabilitation services available under 34 CFR 361 are needed but not available under Idaho Workers' Compensation Law.

Co-enrollment and referrals between the entities has traditionally been low, and the current referral processes detailed in the agreement are sufficient to address the volume of referrals occurring between the entities. Traditionally IIC referred cases are low volume multiple diagnosis referrals including severe and persistent mental health conditions, or individuals who may be waiting on a settlement and need some type of immediate income stream. Additionally, individuals who have settled a claim and are subsequently no longer attached to the commission are then more likely to engage with VR, but these customers no longer fall under the agreement.

Coordination between IDVR and IIC is accomplished through Regional Management attendance of IIC staff meetings. Additionally, IDVR's Administrator has engaged the new director of IIC to help better inform on the services available through the partnership, and navigate the intersection between the programs.

Reciprocal Referral Services between the two VR Programs in the State: The State of Idaho has two VR programs, the Idaho Division of Vocational Rehabilitation and the Idaho Commission for the Blind and Visually Impaired. The two programs have a Memorandum of Understanding (MOU) to establish guidelines and policies to delineate the services both agencies will provide to individuals with disabilities. Furthermore, this agreement enhances cooperation and collaboration between the two agencies, improves inter-agency communication, and establishes staff cross-training opportunities.

Customers of both VR programs in the state of Idaho receive comprehensive VR services in a timelier manner. The Division has recently started obtaining co-enrollment data across all WIOA programs. This data will help improve our cross-program referrals and other collaborative efforts. As of the most recent ETA 9169, 4.3% of Title IV participants are co-enrolled in other WIOA umbrella programs. This figure does not consider co-enrollment within Title IV.

Independent Living: IDVR is the Designated State Entity (DSE) for the Title VII Part B funds distributed by the Administration for Community Living (ACL). IDVR currently contracts and allocates a percentage of the total grant funds to the following entities:

- Idaho Commission for the Blind and Visually Impaired (ICBVI)
- State Independent Living Center (SILC)
- Living Independence Network Corporation (LINC)
- Disability Action Center – Northwest (DAC)
- Living Independently for Everyone (LIFE)

IDVR projects split based upon percentages agreed to by participating entities and uses prior year expenditures for the following projections.

SILC	30.0%
ICBVI	24.0%
LINC	23.0%
LIFE	18.0%
DAC	5.0%
Total	100.0%

SILC	30.0%
ICBVI	21.0%
LINC	24.5%
LIFE	19.5%
DAC	5.0%
Total	100.0%

Part B funds are used to enhance and expand core independent living services.

This agreement is to describe the transfer VR funds for IL activities as outlined in Section 705 and 713 of the Rehabilitation Act of 1973 as amended by the WIOA. This agreement increases the IL centers' ability to provide services to individuals with disability who require independent living services. IDVR does not track services or outcomes as they relate to this cooperative agreement.

Project Search: Project Search is a high school transition collaborative effort between school districts, VR, Community Rehabilitation Programs (CRPs) and host businesses. It is an international, evidence-based model which prepares transition students identified as requiring long term supports for the world of work, thus helping them move into community employment after high school graduation. The Project Search program combines two hours of daily classroom training along with four hours of unpaid internship. These internship experiences are

provided in three different eight-week rotations and can include: housekeeping, dietary, laundry, childcare, and equipment transportation. Even though the students may not be hired by the host business, they are better prepared for work and better able to access employment after Project Search completion.

This collaborative agreement describes the roles, responsibilities, and process between all parties involved. Students participate in internships and other Pre-ETS activities in several rotating work sites. Students develop work skills which will increase their employment options at the completion of the program. The Division maintains employment information on all successful outcomes. Forty-one students have participated in Project Search since PY2018, of those 22 students successfully obtained employment after their participation in Project Search.

Tribal VR (Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Bannock Tribe, and Shoshone/Paiute Tribe): IDVR entered into one collaborative cooperative agreement with all four federally funded Tribal VR programs in the state. The updated cooperative agreement addresses WIOA requirements, specifically to include address transition services to students and youth with disabilities.

The intent of the agreement is to develop and implement a cooperative system for providing vocational rehabilitation services to eligible American Indians with disabilities and to promote and enhance to the greatest extent possible vocational rehabilitation services like that of those provided by the State of Idaho. IDVR has the basic responsibility to provide rehabilitation services to all eligible customers in the State of Idaho. The Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Paiute and Shoshone/Bannock Tribe, through a Federal Section 121 grant, will work cooperatively with IDVR.

American Indian (or Alaska Native) customers benefit from the enhanced cross program collaboration described in this cooperative agreement. They experience greater access to services in an expedient manner because of the well-developed relationships and increased collaboration fostered by the agreement. IDVR staff are provided cultural awareness and sensitivity training so they are better prepared to engage with shared customers. Customers also receive a comprehensive array of unduplicated service.

Currently outcomes are not being tracked in the Division's case management system. The Division still needs to evaluate a better method for collecting jointly served participants.

U.S. Department of Veterans Affairs (VA) Vocational Rehabilitation and Employment (VR&E) Program and IDVR: This cooperative agreement is entered into by the U.S. Department of Veterans Affairs (VA) Vocational Rehabilitation and Employment Program (VR&E), and the Idaho Division of Vocational Rehabilitation with the purpose of ensuring seamless, coordinated, and effective vocational rehabilitation services to Idaho's veterans with disabilities and dependents with disabilities, improving cooperation and collaboration between the two agencies, avoiding duplication of services, improving inter-agency communication, and to establish staff cross-training opportunities.

Veteran customers with disabilities jointly served by VR&E and IDVR receive faster, more streamlined access to services and shared program resources because of the increased collaboration created by this agreement.

Currently outcomes are not being tracked in the Division's case management system. The Division needs to evaluate a better method for collecting jointly served participants.

Partnership Plus (PPLUS): Partnership Plus (PPLUS): IDVR has established PPLUS agreements with five Employment Networks (EN's) in and out of the state. The PPLUS agreements facilitate referrals between IDVR and the EN under the Social Security Administration's (SSA) Ticket to Work program. The Agreement defines the responsibilities of each party in working with Social Security beneficiaries (those receiving SSI Supplemental Security Income or SSDI Social Security

Disability Insurance benefits). This partnership is created once the beneficiary selects an EN, and the EN accepts the referral. A referral to the EN is made within the first month of stable employment. This agreement establishes the basis for collaboration and coordination between the beneficiary, IDVR, and the EN as the beneficiary transitions from the VR program after closure. The EN will provide continued support on the job, i.e., benefits counseling, reporting earnings to SSA, job retention services, and other types of ongoing support, at no cost to the beneficiary. The EN can help the beneficiary maintain or advance in employment and increase their earnings.

Idaho Department of Labor as an Employment Network: The Idaho Department of Labor (IDOL) has revised their PPLUS agreement with IDVR. American Dream Employment Network (ADEN), an administrative EN, has taken over the technical assistance and training of PPLUS for IDOL. The PPLUS agreement describes the referral process between IDVR and ADEN/IDOL under the SSA's Ticket to Work program authorized under the Ticket to Work and Work Incentives Improvement Act of 1999 (P.L. 106-170, Title 1, Subtitle A, 42 U.S.C. 1320b-19 et seq.) and the revised regulations Social Security promulgated under 20 CFR Part 411 that took effect July 21, 2008. The Agreement further describes the responsibilities of each agency in working with Social Security beneficiaries (those receiving SSI/SSDI benefits).

The cooperative agreements with Employment Networks, including the agreement with IDOL, assist those customers who could benefit from additional supports and services needed to maintain their employment. IDVR has experienced low volume referrals to ENs across the state, however IDVR continues to reinforce the value of services provided by ENs for customers who could benefit from additional supports to maintain their employment. IDVR continues to educate staff and works with ENs to market their services to increase the number of referrals. Outcomes are not tracked in the case management system but are tracked by the Central Office Ticket to Work Program Specialist.

Adult Corrections: The Division in collaboration with the Idaho Department of Correction (IDOC), has two Memorandum of Agreements (MOAs) to provide a cooperative effort in the delivery of comprehensive vocational rehabilitation services to customers who are involved with the criminal justice system. The goal of the MOAs is to provide IDVR eligible customers who are reentering the community and under felony supervision in the following service areas: Region I Coeur d'Alene, Regions III and VII Treasure Valley area, Region IV Twin Falls and Region V Pocatello area the opportunity of the full spectrum of IDVR services. IDOC will contribute certifiable non-federal funds towards the case service expenditures.

Incarcerated individuals with disabilities who are ready to transition back into society, receive services in a more efficient and timely manner because IDVR staff are collocated in correction facilities per the cooperative agreement. Staff are able to engage with customers more frequently, prior to release. Counselors who work with incarcerated and ex-offenders better understand the probation and parole requirements which can assist individuals with their IPE services and goals and reduce potential recidivism.

Outcomes are tracked in the case management system by caseload. Of those offenders working with an IDVR corrections counselor, in PY2020, 72 incarcerated or ex-offenders successfully obtained employment.

Transitioning Students with Disabilities: In collaboration with Special Education and IDEA, as well as federal initiatives, the Division has developed cooperative agreements with schools or school districts in various areas throughout the state to provide comprehensive vocational rehabilitation services to students with disabilities to assist with transition to work. A designated VR counselor and staff member are assigned to a consortium affiliated facility to better serve customers in the respective areas.

The school districts contribute certifiable non-federal funds to IDVR to be used for allowable IDVR case service expenditures per the cooperative agreement. The memoranda agreements cover the following areas of the state:

- Region I Coeur d'Alene - Two Projects
- Region II Lewiston - One Project
- Region III Treasure Valley Special Programs - Four Projects
- Region IV Twin Falls - One Project
- Region V Pocatello - Two Projects
- Region VI Idaho Falls - One Project

It is worth contrasting the services in the regions of the state covered by the cooperative agreements versus those not covered. IDVR counselors are either located in high schools or travel to those high schools participating in the project. This increases accessibility to the students eligible and/or potentially eligible for IDVR services. Counselors maintain a dedicated caseload of transitioning students and youth with disabilities until case closure. Dedicated school to work counselors collocated in schools creates closer working relationships with school personnel, provides for more timely referrals, better support throughout the rehabilitation process, and the expertise that comes with specialization. The arrangement has proved important in developing an excellent working relationship between IDVR staff and school districts across the state.

In school districts not covered by the cooperative agreements, students continue to receive the same level of service provision; however, referrals to IDVR are made by school counselors, special education teachers, or by word of mouth. All of the traditional and relevant activities and services are provided by a general caseload counselor. There are no services offered under the cooperative agreements that are not also made available by counselors providing services in the areas not covered by the cooperative agreements. The counselors who only serve students and youth typically are more knowledgeable and specialized in serving this population.

Students with disabilities benefit from the cooperative agreements IDVR has with LEAs across the state because VR staff are collocated in the when practicable, which results in increased accessibility and availability to students, parents, and teachers. This enhanced access has increased Pre-ETS to those potentially eligible students and students who wish to apply for VR services. The cooperative agreements serve as the foundation for improved relationships between VR, students, parents, and teachers.

The Division is beginning to see more students reach their employment goal because of the early engagement with teachers, parents, and students. IDVRs case management system does capture employment outcomes for students who apply for VR services. Not all potentially eligible students apply for services, however those that do are also being tracked.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

The state program which carries out the statewide Assistive Technology program for Idaho is the Idaho Assistive Technology Project (IATP), housed by the Center on Disabilities and Human Development at the University of Idaho. IATP's goal is to increase the availability of assistive technology devices and services for older persons and Idahoans with disabilities. IDVR and IATP have had a long-term working relationship to assist IDVR customers with assistive technology services and devices, to include VR representation on the IATP Council. IDVR is in the early development stages of formalizing a cooperative agreement with IATP. The components of the cooperative agreement will include coordination and availability of services, the reciprocal

referral process, and other programs and resources available through the Idaho Assistive Technology Project.

The collaboration between IDVR and IATP has improved access to AT services and devices for those individuals with disabilities who can benefit from these services. IDVR staff have a linkage directly to AT resources our existing collaborative efforts to include AT assessments, services, and devices from AT subject matter experts. AT services and devices can reduce barriers to employment, allowing individuals with disabilities the opportunity to be more productive and succeed in employment. The Division does not currently track outcomes related to services provided under this agreement. The Division needs to evaluate a method for collecting jointly served participants. The formal agreement with IATP was delayed due to COVID related challenges faced by both agencies. Agreement discussions have recently resumed with the IATP Director with an estimated completion date of September 2022 will be completed by the end of FFY 2020.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

The Idaho Division of Vocational Rehabilitation does not engage in any programs carried out by the Under Secretary for Rural Development of the U.S. Department of Agriculture.

4. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

The Division does not currently have any agreements with non-educational agencies serving out-of-school youth.

When indicated, IDVR will engage in a co-enrollment strategy with other WIOA Plan partners, to provide general VR services and disability related supports.

Out-of-school youth (youth age 14-24 not enrolled in a secondary program) are encouraged to complete their high school education or pursue a formal or self-study GED program whenever possible to increase their options and access to postsecondary opportunities. This includes referral to Idaho Career & Technical Education's Adult Education program (available to those over the age of 16). Idaho Job Corps maintains a partnership with the College of Western Idaho to offer a path to a high school diploma or GED for those age 16-24.

The WIOA Youth program under the Idaho Department of Labor focuses on education, training and employment opportunities for out-of-school youth. WIOA Youth provides an array of services to qualifying youth including dropout recovery services, paid and unpaid work experiences, occupational skill training, leadership development opportunities, facilitation of employer connections, interviewing skills, and mentoring.

The Idaho Division of Vocational Rehabilitation's (IDVR) State Transition Coordinator and Area Transition Counselors meet monthly with the Idaho Youth Apprentice Program (YAP) to develop strategies for working together to create options for youth to participate in apprenticeships. The regional YAP staff began meeting with IDVR staff in the areas they serve to educate all IDVR staff about Youth Apprenticeship opportunities, referral process, and to support IDVR staff in understanding the youth apprenticeship process for in-school versus out-of-school youth. The Youth Apprenticeship Program connects people, ages 16-24, to training and careers in Idaho. Building workforce-ready labor requires a collaborative effort among government, business, and education. Youth Apprenticeship provides education, work experience, and access to postsecondary education, training, and certifications.

IDVR is currently working with YAP to serve a student in Northern Idaho in an apprenticeship pilot. We will use what is learned from Northern Idaho to continue to develop more programs. Additionally, IDVR and YAP are providing joint presentations to the community and to students and teachers.

IDVR is also working with Job Corps to develop ways to provide students with access to paid work experiences, work readiness training, and instruction in self-advocacy in addition to attending their Job Corps courses. Our Area Transition Counselors are points of contact with Job Corps to provide these services in both individual and group settings.

Idaho Job Corps offers qualifying youth extensive support for up to two years depending on individualized need. This includes career exploration and education assistance.

The Division will be coordinating with the apprenticeship program under Idaho Department of Labor for the purpose of expanding apprenticeships in the state. As part of this collaboration, the Division will be hiring an Apprenticeship Coordinator that will work as a liaison for IDVR customers with the IDOL Apprenticeship team, including the Youth Apprenticeship (YAP) team and will bring expertise on how employers can support youth with disabilities to be successful in their apprenticeship programs.

Idaho's Disability Employment Initiative grant and the formal agreement IDVR had with the Idaho Department of Juvenile Corrections have ended. Regardless of the presence of formal agreements, these past projects have resulted in better working relationships between these partners.

Numerous regional partnerships take advantage of local resources or serve as referral sources to IDVR to engage out-of-school youth. These resources differ by location with a common theme of providing a mechanism of outreach for out-of-school youth.

5. STATE USE CONTRACTING PROGRAMS.

Idaho Division of Vocational Rehabilitation does not maintain state use contracts with vendors.

At the state level, some non-profit Community Rehabilitation Programs provide skill development and training for individuals with disabilities through the State of Idaho's State Use Contracting program. While many programs providing state use goods do not meet the integrated criteria established under WIOA, the program does generate income for CRPs allowing increased stability of their overall programs with supplemental revenue. Fiscally healthy CRPs are then able to continue operations in their Competitive Integrated Employment divisions. This indirectly benefits those customers of IDVR who require CRP services.

D. COORDINATION WITH EDUCATION OFFICIALS

1. THE DESIGNATED STATE UNIT'S PLANS, POLICIES, AND PROCEDURES FOR COORDINATION WITH EDUCATION OFFICIALS TO FACILITATE THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO THE RECEIPT OF VR SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, AS WELL AS PROCEDURES FOR THE TIMELY DEVELOPMENT AND APPROVAL OF INDIVIDUALIZED PLANS FOR EMPLOYMENT FOR THE STUDENTS

The following section outlines how IDVR meets the requirements of 34 CFR 361.22: Coordination with education officials.

(a) Plans, policies, and procedures.

(1) The vocational rehabilitation services portion of the Unified or Combined State Plan must contain 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 students with disabilities from the receipt of educational services, including pre-employment transition services, in school to the receipt of vocational rehabilitation services under the responsibility of the designated State agency.

(2) These plans, policies, and procedures in paragraph (a)(1) of this section must provide for the development and approval of an individualized plan for employment in accordance with § 361.45

as early as possible during the transition planning process and not later than the time a student with a disability determined to be eligible for vocational rehabilitation services leaves the school setting or, if the designated State unit is operating under an order of selection, before each eligible student with a disability able to be served under the order leaves the school setting.

The Division has developed and maintains policies and procedures for IDVR staff in Section 9 of the Field Services Policy Manual: Pre-Employment Transition. This section contains field guidance under the following categories:

- IDVR Policy: Pre-Employment Transition and Transition Services for Students and Youth outlines Division policy for internal staff and includes sections on Pre-ETS, Service Provision and Collaboration with Schools, Potentially Eligible Students, Pre-ETS services for students, transition services, youth with a disability, student with a disability, IPE development, Pre-ETS services exemption from financial participation, auxiliary aids or services, and guidance for Pre-ETS delivery under Order of Selection (note: IDVR is not currently under OOS and does not anticipate entering OOS according to current projections). IDVR Policy defines Student with a Disability including age and education requirements within this policy. The earliest a student can engage in Pre-ETS is 14 as agreed to by IDVR and ICBVI. This age was determined through collaboration with our blind agency ICBVI and the state department of education during development of our Interagency Agreement. We determined the start age of 14 because of statewide initiative with CTE that is focuses on middle school. The age is documented in our Interagency Agreement. It has been communicated to IDVR staff through the Pre-ETS Guidance Document.
- IDVR Procedures: Pre-Employment Transition Services: This document is a guide for IDVR staff outlining Pre-ETS Procedures. This guide does outline some contract processes and guides to help IDVR staff understand the differences in how contracts are framed, but all contract requirements and actual contracts are conducted as a separate formal process following all required policies and rules outlined by the Idaho Division of Purchasing (as outlined in individual contracts and designed to meet the requirements of this section). IDVR staff can only approve and authorize services within the context of their position, approval authority, and as outlined in policies and procedures. Processes include: LEA paid work process (with procedures for LEA and IDVR staff), traditional IPE case Pre-ETS processes, pre-case type processes, LEA summer programs, Occupational Preparation Advocacy Lab, CTE Exploration Program, IESDB (LEA) Summer Work Camp and Paid Work Experience, Idaho Parents Unlimited (IPUL) Work of Art, Institutes of Higher Education (IHE) Programs (Summer and School Year sections), Summer Bootcamp, Summer Self-Advocacy classes, Tools for Life, Summer Work Experience, Employer Reimbursed Work Experience (100-hour), 40-Hour individual CRP employer Work Readiness Training and Work Experience, Job Shadows (VR provided and CRP based), Vendor travel for remote and underserved areas, Conover online, The Idaho Transition Institute, and a Pre-Case Checklist guide.

Plans:

IDVR maintains multiple documents for the purposes of Pre-ETS planning. These include the IDVR Pre-ETS Strategic Plan, the Statewide Transition Plan (STP), and other relevant transition plans (as needed).

(b) Formal interagency agreement.

The SDE, IDVR, and ICBVI have developed a comprehensive formal interagency agreement which meets the requirements of 34 CFR 361.22(b)(1-6) by addressing eligibility criteria, collaborative service provision, consultation and technical assistance, including the programmatic and fiscal responsibilities for each agency, as well as procedures for outreach,

application (when required) and early engagement. The latest amended agreement is in effect as of January 2022.

Additionally, the Agreement details that the IPE must be developed, agreed to and signed by the student, or the student's representative, and the VR counselor, as early as possible in the transition process, within 90 days from eligibility and no later than the time the student leaves the school setting, whichever is earlier.

This agreement provides the assurances required for coordination with 34 CFR 397 (Limitations on the use of subminimum wage) for proper notification and documentation requirements when a student becomes known to be seeking less than minimum wage employment. Additionally, the agreement notes SDE and LEA responsibilities to:

- Per 34 CFR 397.31 neither the Idaho State Department of Education nor a local education agency will enter into an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at subminimum wage.

Specific criteria are used to determine which agency (IDVR, ICBVI or LEA) has the primary responsibility for providing and paying for transition related services for students with disabilities. These criteria are based on several factors, including the purpose of the service, which entity customarily provides the service, and program eligibility (per 34 CFR 361.22(c)).

IDVR Pre-Employment Transition Highlights. The Division has developed Pre-ETS implementation strategies to provide services at the following levels, including all required pre-employment transition services (job exploration counseling, work-based learning experiences, counseling on opportunities for enrollment in postsecondary education, workplace readiness training to develop social skills and independent living, and instruction in self-advocacy). The Division has continued to modify and improve these strategies, including the coordinated and authorized services, as service delivery and partnerships evolve. For example, the Division has developed numerous Memorandum of Agreements (MOAs) with various Local Education Agencies (LEAs). These include contracting with educators to provide a Self-Advocacy curriculum for students previously developed through a partnership between the Idaho State Department of Education, IDVR, an Idaho LEA, and the National Technical Assistance Center on Transition (NTACT). The Division has also developed MOAs to provide students with an opportunity to participate in a paid work experience while earning summer school credit.

The Division has also improved coordinated activities by having our VR Counselors work collaboratively with local school personnel to develop effective referral and outreach strategies to maximize opportunities for students with disabilities to participate in Pre-ETS activities. These strategies also include opportunities for students who are receiving accommodations under Section 504 of the Rehabilitation Act. VR Counselors are attending numerous IEP meetings and are working with districts to develop a better process for inviting VR counselors to IEP meetings. In addition, VR Counselors are working with districts to coordinate pre-employment transition services. VR Counselors are working with LEAs to provide career fairs and career mentoring.

IDVR also now has three area transition counselors (ATCs) whose focus is to increase the number of students receiving pre-employment transition services and to increase the number and types of services that are available to students. They use our Power BI data to evaluate where we are low in referrals or have limited student involvement in Pre-ETS. They specifically target service provision in these areas; these are largely rural areas. Additionally, they are attending an increased number of IEP meetings to assist with coordinated services. One counselor covers northern Idaho, one cover southeast and south-central Idaho, and one covers southwest Idaho.

The ATCs have also worked hard to develop strong working relationships with counselors and within the schools. The ATCs have provided presentations to many school districts (both virtual and in-person) where they discuss various services that are available to the students and to discuss the referral process. They have also provided informational group meetings with parents and students. The ATCs have also participated in many Pre-ETS planning sessions with schools that were identified by IDVR as underserved/underrepresented for their size. These planning sessions have been productive and have increased student engagement from those schools. The ATCs have meetings with special education directors to identify their perception of student needs to best assist with the transition out of high school. Additionally, these ATCs hold discussions to better gauge perceptions of the VR/school alliance and how we can further strengthen this relationship.

The ATCs have also worked with the school-to-work counselors closely. ATCs meet with SWT counselors on a regular basis to brainstorm ideas, address emerging issues, and discuss Pre-ETS in general. They have worked with several staff to set up WBLE for rural LEAs. Additionally, ATCs attended several events with SWT counselors for deeper engagement with school districts with projects such as Reality Town, school presentations, a tour of multiple CTE programs, career fairs, or observing programs at the LEA. They have also actively engaged with LEAs to help start 18-21 programs with plans to expand this initiative to other schools.

Finally, the ATCs have worked with new IDVR staff to introduce them to the world of Pre-ETS. This early staff training is important as Pre-ETS is a major part of the VR process. The ATCs have also been the main point of contact for many schools when a region experienced significant staff turnover. This has been an important task as we work to maintain positive relationships with school districts and not lose the progress, we have made this year.

The Division also works with the State Department of Education, the Idaho Commission for Blind and Visually Impaired, LEAs, Institutes of Higher Education (IHEs), and the Council for Developmental Disabilities to put on a Transition Institute for LEAs and VR staff. The Institute is modeled after NTACT Taxonomy for Transition Programming. The Taxonomy for Transition Programming provides solid practices identified from effective programs and evidence-based predictors of post-school success for implementing Pre-ETS and transition focused education. This Institute allows collaborative planning between LEAs and VR. Teams, at the regional level, discuss what transition/pre-employment transition services are available to students and what services are needed by students based on each district. Teams then create plans to help increase the necessary services for students with disabilities.

The Division has strong relationships with education agencies throughout the state, including formal interagency agreements with several Local Education Agencies (LEAs), a comprehensive formal interagency agreement which addresses collaborative service provision with the State Department of Education (SDE), and the Idaho Commission for Blind and Visually Impaired (ICBVI).

The Division and the SDE have developed a comprehensive formal interagency agreement which addresses collaborative service provision. This agreement specifies the programmatic and fiscal responsibilities for each agency and identifies the minimum age for service delivery to students with disabilities. The minimum age is 14 for service delivery to students with disabilities.

The pre-employment transition services will be provided to students with disabilities who are potentially eligible or eligible for VR services. This agreement was formalized and signed in November 2020. The agreement is reviewed annually for relevance and will be amended by mutual consent as needed.

Lastly, the Division has partnered with the SDE to implement a Statewide Secondary Transition Plan which correlates to the Division's Pre-Employment Transition Plan. The goal on the

statewide plan is to develop systems for effective collaboration between students, families, secondary and post-secondary educators, rehabilitation counselors, Career and Technical Education (CTE), and service providers to provide quality transition activities and pre-employment transition services to students across Idaho. The Statewide Transition Plan is further detailed in section 2B.

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

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

The formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains several provisions designed to promote communication and the sharing of technical expertise in transition planning.

The agreement stipulates that the vocational rehabilitation agency must provide consultative and technical assistance services to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including employment.

The agencies agree to:

1. Encourage staff to work closely with LEAs to ensure coordination between education services, pre-employment transition services, and vocational rehabilitation services.
2. IDVR and ICBVI counselors will provide training and information to school district personnel, students and families on pre-employment transition and vocational rehabilitation services, including their role as IEP team members.
3. IDVR and ICBVI counselors are available to consult with educators concerning pre-employment transition and vocational rehabilitation services for students to assist them toward employment.
4. IDVR and ICBVI counselors will collaborate with the LEAs in their service area to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
5. IDVR and/or ICBVI counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student's parent or legal guardian. VR counselors may attend either in person or via video or telephone. The IDVR and/or ICBVI counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
6. IDVR and ICBVI counselors will consult with educators concerning referral of students to IDVR and/or ICBVI for rehabilitation services, including pre-employment transition services. Students with blindness or visual impairments should be referred to ICBVI. Students with multiple disabilities may have dual cases with both IDVR and ICBVI to provide rehabilitation services.
7. IDVR and ICBVI counselors will accept referrals for pre-employment transition or vocational rehabilitation services, when appropriate, and will work collaboratively with input from the student's IEP team, for service provision and/or to develop an IPE. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required vocational rehabilitation services that will move the student towards their employment goal.

8. IDVR and ICBVI counselors will help students and youth with disabilities develop and participate in Pre-Employment Transition services, including work-based learning opportunities, provide information, support, and guidance to transition students, parents, and schools to promote effective transition services, help eligible students develop an IPE, plan and promote the use of Pre-ETS and transition services, identify and help students and their families access other appropriate resources, help students obtain technology evaluations, recommended assistive technology, and training in the use of purchased equipment, when appropriate.
9. All Vocational Rehabilitation State Plan requirements, including Order of Selection, will apply to all services provision under this cooperative agreement.

Idaho Interagency Council on Secondary Transition:

The Idaho Interagency Council on Secondary Transition is established by the Superintendent of Public Instruction to advise, review, analyze, and monitor the implementation of the State's Interagency Agreement on Secondary Transition. The authority to establish this Interagency Council lies in IDEA Section 640(b)(1)(A) and regulation 300.154. IDVR continues to be involved in the Idaho Interagency Council on Secondary Transition with the purpose of ensuring that students with disabilities experience a collaborative, comprehensive system that facilitates a smooth transition from secondary school to adult life. The goal of this group is to increase the number of students with disabilities who are actively engaged in postsecondary education, employment, and community activities. Interagency cooperative planning, information sharing, and the collaborative use of resources assist in accomplishing IDVR's mission at the state and local level. Members include the Idaho State Department of Education (SDE), Idaho Division of Vocational Rehabilitation (IDVR), Idaho Commission for the Blind and Visually Impaired (ICBVI), Idaho Educational Services for the Deaf and Blind, Idaho Parents Unlimited, Council on Developmental Disabilities, Department of Labor, Boise State University, Idaho State University, The Assistive Technology Project , Idaho Health and Welfare, Juvenile Corrections, Department of Correction, and LEAs.

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

Statewide Transition Plan - IDVR, the State Department of Education (SDE), Idaho Parents Unlimited, Council on Developmental Disabilities, Boise State University, University of Idaho, West Ada School District, Lake Pend Oreille School District, and Bonneville School District, have developed and implemented a statewide secondary Transition Plan with support and assistance from NTACT (National Technical Assistance Center on Transition). The goal of the plan is to increase referral and connection to evidenced based transitions and postsecondary services by ensuring broad student/family awareness of resources and opportunities, and mapping pathways for students of differing needs that allows for effective hand-off from one service/agency to the next.

Expected outcomes include increased provider understanding of CTE programming and pathways; increased provider understanding of DHW services and processes for transition from student to adult services; increased number of students receiving pre-employment transition services or needed transition services; continued collaboration at the local level because of the transition institute, and more students participating in post-secondary services, with the ultimate goal of promoting higher quality employment outcomes for Idaho students with disabilities.

This is done in various ways. The planning of activities which may be joint activities occurs through three main avenues.

- First at the central office level, the transition coordinator works with LEAs and IHEs to plan different Pre-ETS that will be available to student either during the school year or summer. Contracts for these services outline the requirements and expectations for the service. Dates of the summer programs will be set through discussion between the LEA and the Transition Coordinator. Dates during the school year will be determined through discussion with the LEA and the IHE. Either a local VR counselor or an ATC will assist in setting these dates and times.
- Second, the ATC team promotes appropriate planning and service provision within their designated areas. The ATC will work with the LEA to determine types of service need, when the service can be provided, and who (either IDVR staff or a contractor) will provide the service.
- Finally planning of activities may occur at an IEP meeting, IPE meeting, or individually scheduled meeting with IDVR staff. VR counselors will work with the student and family during one of these times to determine what if any Pre-ETS are needed and will plan accordingly.

IDVR counselors attend hundreds of IEP meetings statewide each year where they discuss Pre-ETS and VR services with students and families. IDVR also created a one-page Request for Pre-Employment Transition Services form that is easy to complete to receive Pre-ETS. This makes the process for receiving Pre-ETS quick and easy for students and families. However, students still meet with a VR counselor when completing the form. During this time, the counselor discusses the VR program and what additional services can be made available to the student when they fully participate in the VR program. Additionally, while receiving Pre-ETS, students are provided information about the VR program and how VR can support students with employment and educational goals.

IDVR also conducts significant outreach as part of collaboration with LEAs to discuss both Pre-ETS and the VR program. They are also provided information on the VR eligibility process, so they can provide this information to families. The Transition Coordinator attends regional special education directors' meetings to present on Pre-ETS and VR services. IDVR also presented at the 504 coordinators meeting, the superintendents meeting, and the statewide Transition Institute. IDVR provides numerous presentations at Tools for Life, which is a conference that students with disabilities attend. Presentations include information on Pre-ETS, VR services, and the VR eligibility process.

Lastly, IDVR developed an informational packet for students and families that can be shared by teachers at IEP meetings when the VR counselor is not able to attend. IDVR developed two videos that have been shared with teachers on Pre-ETS and the VR program as well as the eligibility process for VR. These videos are maintained on the VR website. These videos disseminated to LEA staff via the State Department of Education's Transition Coordinator.

Furthermore, the formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains several provisions designed to facilitate the development and implementation of Individualized Education Programs (IEPs). The agencies agree to cooperate in the development of transitioning students' Individualized Education Programs (IEPs) and any relevant Individual Plan for Employment (IPEs). Development of the IEP is vested with the IEP team, including the student and his/her parent or guardian. Approval of the IPE is vested with the IDVR or ICBVI, the student and his/her parent or guardian.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

IDVR has continued to participate in agreements with many LEAs across Idaho, initiated prior to WIOA, however these agreements do not afford unique services to students in these districts. In other words, Pre-ETS and transition services offered under these agreements do not increase services or expand the scope of services over any other political subdivision of the state. All Pre-ETS and transition services are offered statewide to all LEAs regardless of agreement status. IDVR has staff assigned to all public high schools across the state.

Idaho State Department of Education (SDE) - Secondary Transition:

Idaho Division of Vocational Rehabilitation (IDVR), Idaho Commission for Blind and Visually Impaired (ICBVI), and the State Department of Education (SDE) agreement ensures a coordinated, comprehensive system focusing on students with disabilities as they transition from secondary school to post-school activities, promoting post-secondary education, vocational training, competitive integrated employment (including supported employment), continuing and adult education, adult services, independent living, and community participation emphasizing a team approach to facilitate the transition of students with disabilities from public education into employment.

This agreement addresses the following:

- Pre-Employment Transition Services will be provided to students with disabilities who are potentially eligible or eligible for VR services beginning at the age of 14.
- Roles and responsibilities of each agency, including which agency is state lead
- Financial responsibilities of each agency, including the purchase of Assistive Technology
- Procedures for outreach, consultation, training, and technical assistance
- Transition planning
- Referral process for students with disabilities to the appropriate VR program
- Data release and data sharing
- Dispute resolution
- Prohibition on entering into an arrangement with an entity holding a 14(c) special wage certificate for the purpose of operating a program where people with disabilities are engaged in work at subminimum wage.
- Coordination and documentation requirements under section 511

IDVR has created a Youth Subminimum Wage Document Requirements Checklist which includes the documentation requirements and responsibilities under Section 511. Various requirements are detailed in the top-level checklist for youth, including the requirement for a transition or Pre-ETS service to be completed prior to youth verification of Career Counseling and Information and Referral (CCI&R) under Section 511. The Transition Services Documentation and Checklist details LEA requirements for documenting provision of a transition service. Finally, the Youth Career Counseling Verification Requirements section outlines areas and responsibilities of IDVR in ensuring regulations are met ahead of providing verification of receipt of CCI&R.

Section 511 Subminimum Youth Checklist

The following steps must be completed before IDVR can provide **verification** of Career Counseling and Information and Referral to Youth Seeking Subminimum Wage Employment

1. The provision and documentation of transition services or pre-employment transition services (a. or b. must be completed)

a. Transition Services Documentation Checklist Completed

b. Pre-employment Transition Services Documentation Checklist Completed

2. Application for VR services AND one of the following (a. b. or c. must be completed)

    a. Ineligibility Determination Checklist Completed

    b. Closure after an Approved IPE Checklist Completed

    c. Informed Choice Not to Pursue Competitive Integrated Employment Form Completed

3. The provision of Career Counseling, and Information and Referral Services (ALL must be completed)

    a. Youth Career Counseling Verification Elements Signed by Counselor

    b. Information and Referral Packet Provided to Youth

    c. Career Counseling, Information and Referral Youth Verification Form for Stated Subminimum Employment Goal Completed

4. Once all of the preceding steps have been satisfied, verification of CC/I&R can be provided to the youth and they would be able to legally work for less than minimum wage. The 511 Subminimum Youth Checklist only has to be completed once. After the youth completes this process, they would engage in group sessions at the 14c to meet ongoing requirements for CC/I&R for youth.

Section 511 Transition Services Documentation Checklist and Cover Sheet

34 CFR § 397.30 outlines the responsibilities of local educational agencies to youth with disabilities who are known to be seeking subminimum wage employment. All elements of this form must be completed in order for the checklist to be considered valid evidence of the completion of transition services for the purposes of satisfying Section 511 requirements of the Workforce Innovation and Opportunity Act.

1. (To be completed by the Local Education Agency): The documentation of completion of appropriate transition services for a youth with a disability under IDEA

    a. This can be transmitted in the form of an Individualized Education Plan, but must contain at a minimum (please verify the following are contained in this release):

        i. Youth's name

        ii. Description of the service or activity completed

        iii. Name of the provider of the required service or activity

        iv. Date required service or activity completed

        v. Signature of educational personnel documenting completion of the required service or activity

        vi. Date of signature documenting completion of the required service or activity

        vii. Date and method (e.g., hand-delivered, faxed, mailed, emailed, etc.) by which document was transmitted to IDVR

viii. A cover sheet that itemizes the documentation that has been provided to the VR program regarding that youth (completion of the elements above satisfies this requirement)

ix. Verification that the educational agency will keep a copy of all documents sent to the VR program

x. Signature of the individual transmitting this documentation

2. (To be completed by Vocational Rehabilitation):
    a. Verification that VR has filed a copy of this information
    b. Verification that this information has been provided to the youth

Youth Career Counseling Verification Elements

Prior to initial verification of CCI&R for youth known to be seeking subminimum wage employment, IDVR must ensure counselors providing the service address the following elements of the VR process including a discussion of competitive integrated employment and services available at VR to assist the individual in making an informed choice whether or not to continue pursuit of employment with a 14(c) certificate holder.

1. Self-advocacy, self-determination, and high expectations
    a. Identify the individual's desires for employment including type, pay, hours, benefits, etc.
    b. Ensure informed choice
2. Review of any assessment information available
    a. Primary employment factors
        i. Strengths
        ii. Interests
        iii. Abilities
        iv. Capabilities
        v. Resources
        vi. Priorities
        vii. Concerns
        viii. Informed Choice
    b. Person-centered planning
    c. Marketable skills
    d. Soft skills (current and where development is needed)
3. Use of labor market information
    a. In-demand occupations
    b. Job exploration
        i. Education and experiential requirements

ii. Pay

iii. Hours

iv. Functional capacity requirements

v. Career pathways

c. Electronic resources and navigation fundamentals

4. SSA Benefits Planning

When engaging in career counseling with individuals with disabilities, rehabilitation professionals should ensure that they are aware of cultural differences and that they discuss the available options such as supported or customized employment. A discussion of the need for assistive technology or reasonable accommodation on the job is important to maximize the potential for success. It is helpful to assess the individual's support system and to provide information on available resources for the individual.

A completed signature sheet (signed by the customer and VR counselor) affirming that the elements of Career Counseling have been discussed with the customer in the course of the provision of Vocational Rehabilitation Counseling and Guidance.

The current agreement establishes the following roles and responsibilities for the involved parties:

The Idaho State Department of Education (SDE) agrees to:

- Assume the role of lead agency in facilitating interagency planning with LEAs and implementing educational programs and transition services for students with disabilities from high school to post-high school services.
- Support LEAs in their efforts to write IEPs using an outcome-oriented focus and to coordinate transition activities for each IEP eligible student, beginning no later than the IEP created before the student turns age 16 years old (earlier if appropriate), and to address future student needs in the areas of post-secondary education, vocational training, employment, and adult living and communication participation, including assistive technology.
- Support LEAs to collaborate with the student and the family to plan and provide educational services to meet individualized educational objectives, which are documented on an IEP.
- Support LEAs to work in partnership with the student, the student's family, and other community resources to coordinate services within the community.
- Support LEAs to provide ongoing information to the student and the family about the student's educational development.
- Invite IDVR and/or ICBVI to provide information regarding their services, including their role as an IEP team member to school district personnel, students, and their families.
- Invite IDVR and/or ICBVI counselors, with prior consent from adult students or parents or legal guardians, as appropriate, to participate as members of IEP teams for students who have been referred to IDVR and/or ICBVI for rehabilitation services, or earlier if appropriate.

- Work with IDVR and ICBVI Vocational Rehabilitation (VR) counselors to identify a process for such counselors to provide input and participate in the development of a student's IEP, including pre-employment transition services, when appropriate.
- Identify appropriate school personnel who, with prior consent from adult students or parents or legal guardians, as appropriate, will initiate the referral process of students receiving special education services, and students who have a 504 Plan (Rehabilitation Act of 1973), or students with disabilities (e.g., physical, medical, or visual, etc.) who are not eligible for special education services, to IDVR and/or ICBVI for pre-employment transition services and/or vocational rehabilitation services.

Idaho Division of Vocational Rehabilitation (IDVR) and Idaho Commission for the Blind and Visually Impaired (ICBVI) agree to:

- Agree to establish the age of 14 to begin working with students with disabilities.
- Encourage staff to work closely with LEAs to ensure coordination between education services, pre-employment transition services, and vocational rehabilitation services.
- IDVR and ICBVI counselors will provide training and information to school district personnel, students and families on pre-employment transition and vocational rehabilitation services, including their role as IEP team members.
- IDVR and ICBVI counselors are available to consult with educators concerning pre-employment transition and vocational rehabilitation services for students to assist them toward employment.
- IDVR and ICBVI counselors will collaborate with the LEAs in their service area to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
- IDVR and/or ICBVI counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student's parent or legal guardian. VR counselors may attend either in person or via video/telephone. The IDVR and/or ICBVI counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
- IDVR and ICBVI counselors will consult with educators concerning referral of students to IDVR and/or ICBVI for rehabilitation services, including pre-employment transition services. Students with blindness or visual impairments should be referred to ICBVI. Students with multiple disabilities may have dual cases with both IDVR and ICBVI to provide rehabilitation services.
- IDVR and ICBVI counselors will accept referrals for pre-employment transition or vocational rehabilitation services, when appropriate, and will work collaboratively with input from the student's IEP team, for service provision and/or to develop an IPE. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required vocational rehabilitation services that will move the student towards their employment goal.
- All Vocational Rehabilitation State Plan requirements, including Order of Selection, will apply to all services provision under this cooperative agreement.

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

Idaho Division of Vocational Rehabilitation (IDVR), Idaho Commission for Blind and Visually Impaired (ICBVI), and the State Department of Education (SDE) currently have a formal cooperative agreement.

The agreement stipulates that the vocational rehabilitation agency will initiate outreach and work with the LEAs to identify potential students with disabilities who need pre-employment transition services and VR transition services for students aged 14-21. This involves informing the student, or when appropriate their parent or legal guardian, as early as possible about the vocational rehabilitation program, its purpose, eligibility criteria, application procedures, and the scope of available VR services, to include pre-employment transition services.

The Division has also participated in a series of meetings in communities across Idaho including key stakeholder engagement through a series of regional special educator meetings, statewide administrator meetings, the Statewide Transition Institute, Tools for Life with parents, students, and educators, Idaho Parents Unlimited, Idaho Interagency Council on Secondary Transition, and continues ongoing discussions on student outreach with the Idaho State Department of Education.

The Division also developed a Transition Leadership Team. This team has members from each of the eight regions. These leaders provide outreach across the state.

Additionally, IDVR counselors and the Area Transition Counselors have worked with educational counterparts to significantly increase the number of potentially eligible students receiving pre-employment transition services and increase referrals for the VR program after seeing a decline due to COVID-19. Finally, in 2019 IDVR staff, the State Department of Education, the Idaho Parents Center, Idaho Educational Services for the Deaf and Blind, WINTAC, and NTACT worked to create a strategic plan for pre-employment transition services in Idaho. Although this plan was meant to be a two-year plan, with the intrusion of COVID-19 it was determined to review and renew the plan in 2022 to allow time to complete the activities currently indicated on the plan. The first goal developed by the team was to increase internal (VR staff) and external (school districts, parents, students, community partners) clarity and messaging regarding VR process and how Pre-ETS fits into the overall continuum of VR services. The following action steps were created to achieve this goal:

- Create a process to address information sharing between school and VR counselors

1. Service request form
2. IEP
3. 504

- Develop materials to share information about VR services with parents and schools

1. Pre-ETS
2. VR Services

- Options for VR Counselors to participate in the IEP process by

1. Providing information about services
2. Developing services to address student goals/needs
3. Creating a timeline for initiating referral/eligibility

- Create training and materials that will increase students' understanding about the VR process and services
- Complete the internal Guidance Document regarding Pre-ETS to be used by IDVR staff

1. Accountability Measures- Outcomes for Students
2. Develop a continuum of services reflective of Pre-ETS and Transition Services

- Create opportunities and materials to use with families to increase their understanding of expectation of work and VR Services

The second goal is to strengthen cross agency partnerships to increase collaboration in development and implementation of Transition Services. The following action steps were created to achieve this goal:

- Review and adjust data collection that will improve ability to better inform decision making

1. Work with SDE to obtain break out of schools, # of students on IEP and 504
2. Identify additional data points and how to use them
3. Communicate to the VR field staff how to use the new data points
4. Share IEPs using a new system

- Regional managers are informed and engaged in how they can support VR Counselors in providing Pre-ETS and Transition Services.

1. Identify strategies to include Regional Managers

- Outreach strategies to rural schools are identified with steps to address student participation
- Outreach strategies identified for juvenile justice and Foster Care.

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

IDVR does not establish cooperative agreements with private nonprofit vocational rehabilitation service providers. Services are purchased on a fee for service basis. IDVR does have cooperative agreements with several nonprofit CRPs for the coordination of services provided by Employment Networks for individuals who are Social Security beneficiaries who are Ticket holders. These cooperative agreements describe the coordination between both agencies.

IDVR maintains a Community Rehabilitation Providers (CRP) portal on the Division's website. The portal hosts communication relevant to CRPs and IDVR's CRP Manual. This Manual was first issued in January 2019 and incorporates significant input solicited from CRPs. The CRP Manual contains information on:

- Service Billing Criteria and Process
- Service Definitions
- Overview of the On-Site CRP Monitoring Review and Corrective Action Process
- Definition of Remote and Underserved Areas where IDVR supports travel due to lack of local services in identified areas
- CRP Services Crosswalk to better align services under WIOA
- Appendix information on the initial pilot for Customized Employment including rates and milestones for that pilot

The manual is intended to serve as a living document which will be updated over time, as needed, with input from CRP stakeholders. A new version of the CRP Manual is tentatively slated to be released July 2022. IDVR has already collected CRP comment in late 2019 for Manual improvements. Planned iterations of the guide include:

- Examples of completed referrals/sample reports to promote quality referrals from VR staff and reports from CRP staff
- Modified monitoring protocol to align with WIOA priorities
- CRP onboarding requirements (accreditation, insurance, and prerequisites to ensure a baseline of quality and accountability)
- Updated fee schedule to better align service compensation and service complexity

CRPs provide specific services for customers based on a fee-for-service or through a specific invitation to bid on a Request for Proposal (RFP). Idaho CRPs must be accredited by either the Commission on Accreditation of Rehabilitation Facilities (CARF) or the Rehabilitation Services Accreditation System (RSAS), follow the process and procedures mentioned in this manual, and undergo periodic monitoring by IDVR to continue a working relationship with the Division. This manual addresses the Idaho Division of Vocational Rehabilitation's state-federal program. The CRP Manual outlines the service billing criteria and process required before the Division will process bills, including prohibitions on billing for multiple customers unless group services are authorized. Group service rates differ from individual service rates and are outlined in IDVR's Fee Schedule. Furthermore, day rates are published for non-community-based assessment where no other options are available in the community. This section also mandates notification in the eventuality of anticipated service discontinuation and prohibits customer abandonment (instead requiring at least 30 days notification for a soft handoff to another CRP ahead of CRP closure in a region). A dispute resolution process including an escalation chain is also established in this section of the guide.

IDVR identifies allowable services under Section Two of the CRP Manual: CRP Service Definitions. Service outlined in this section include the major headings of assessment, job related supports (job search activities, short-term job supports, job readiness training), Pre-ETS (required activities under 34 CFR 361.48(a)(2)), and Supported Employment. Additionally, requirements to document fading and/or skill acquisition for the continue of SE hours are articulated in this section. IDVR is working with CRPs to strengthen understanding of documented progress toward SE stability, and CRPs have requested additional guidance in this area. The Division will issue improved guidance in the tentative July 2020 release of the Manual. Slated improvements include increased guidance on specific services with a potential incorporation of the agency's benefits planning initiative. The manual covers documentation of stability and transition to extended support and outlines the Youth Extended Services option to provide this service to qualifying youth where no alternate funds for extended support are available.

IDVR is in the process of evaluating the current CRP fee schedule for allowable costs using:

- WINTAC's "Review of Vocational Rehabilitation Agency Rates, Methodology, & Monitoring of Performance for Purchased Service" which includes
    - An evaluation of rates for similar services paid by other SVRAs
    - Federal cost principles at 2 CFR 200.405(a) to align costs to relative benefit
    - Accreditation requirements
    - Payment methods (fee-for-service, performance, contracts)

- Reporting requirements
- Monitoring

The Division's 2022 modification of the guide will apply each of these considerations to inform potential fee updates: While the Division's current CRP Manual (January 2019) does address each requirement, the Division's analysis may incorporate innovative practices used by other SVRAs. Currently the Division does not separate rate by complexity of rehabilitation needs but is seeking to remedy this deficiency. The Division is enlisting the assistance of the Idaho Division of Purchasing to inform the analysis of service rates. Novel rates for Customized Employment and Benefits Planning are expected outcomes of this process, in addition to a reconsideration of the agencies total fee schedule. The Division continues to engage in relevant CRP Communities of Practice (e.g. Region X CRP Managers, Supported Employment, and Customized Employment groups), and has engaged with other states to learn more about their contemporary approaches to rate setting, including lessons learned during implementation.

Pre-employment Transition Services (Pre-ETS) agreements including rates are established under a separate process. In areas where volume is sufficient, the Division employs bids/contracts. The majority of contracts are filled in regional population centers, however when an area has no contract (rural and remote Idaho), or all slots are filled for a contracted group, the Division employs individual Pre-ETS provision at existing hourly rates to ensure the availability of Pre-ETS,

IDVR issues an annual report of CRP performance, the Community Rehabilitation Partner Employment Report (CRP-ER) process which produces the following elements by CRP and region:

- Number of CRP Provided Employment Services
- Employment Outcomes with CRP involvement in closure
- Average Hourly Wage of placements
- Average Hours Worked
- Average Annual Earnings
- Percentage of Employer Sponsored Benefits
- OES employment outcomes by category
- Primary impairments served by percentage of total served
- Percentage served within age strata

The CRP-ER is disseminated to CRPs annually and used by VR staff to assist with informed choice of CRP when selecting a provider for planned services. Reports are issued for general CRP services, and for Supported Employment (only) service paths to better identify performance across these groups.

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

Supported employment means competitive integrated employment (CIE), including customized employment (CE), or employment in an integrated work setting in which an individual with a most significant disability, including a youth with a most significant disability, is working on a short-term basis toward competitive integrated employment that is individualized, and customized, consistent with the unique strengths, abilities, interests, and informed choice of the individual, including ongoing support services for individuals with the most significant

disabilities. SE can be provided by VR for a period of time not to exceed 24 months, unless the VRC and customer jointly agree to extend the time to achieve the employment outcome identified in the IPE.

SE service are restricted to those customers assigned to the Most Significant Disability (MSD) category. The Disability Priority Page in AWARE is used to document the justification of priority category assignment. The category assignment is also displayed on the eligibility determination. A brief breakdown of severity categories follows:

Severity of Disability Priority Categories

Priority 1 – Most Significant Disability (MSD)

- Meets criteria for SD; ***AND***
- Experiences severe physical or mental impairment that seriously limits **three or more** functional capacities (such as mobility, work tolerance, communication, self-care, interpersonal skills, self-direction, and work skills) in terms of an employment outcome; ***AND***
- Requires multiple primary IPE services over an extended period of time

Priority 2 – Significant Disability (SD)

- Receives Social Security Disability Income or Supplemental Security Income.

OR all of the following:

- Meets criteria for Disability (D); ***AND***
- Experiences severe physical or mental impairment that seriously limits **one or more** functional capacities (such as mobility, work tolerance, communication, self-care, interpersonal skills, self-direction, and work skills) in terms of an employment outcome; ***AND***
- Requires multiple primary IPE services over an extended period of time

Priority 3 – Disability (D)

- Has a physical or mental impairment; ***AND***
- Has a substantial impediment to employment as a result of the impairments; ***AND***
- Who can benefit in terms of an employment outcome from the provision of vocational rehabilitation services.

Furthermore, SE is indicated for individuals for whom CIE has not historically occurred, or for whom competitive integrated employment has been interrupted or intermittent as a result of a significant disability; and because of the nature and severity of their disabilities, need intensive supported employment services and extended services after the transition from support provided by IDVR in order to perform this work.

A Comprehensive Assessment of Rehabilitation Needs (CARN) must contain information supporting a need for SE and ES prior to engaging a customer in SE services

Any additional assessments/evaluations purchased by IDVR to determine this need should be conducted in an integrated setting to the greatest extent possible.

For the purposes of this policy, SE refers to support services (like job coaching) provided after placement and before the individual reaches initial stability, and prior to utilization of extended services (long-term supports).

Extended Services (ES) are those services, including Youth Extended Services (YES), provided after the assessment of initial stabilization when required for an individual to maintain employment (to sustain employment stability). IDVR limits the provision of extended services exclusively to youth.

Youth Extended Services (YES): WIOA requires IDVR to make YES available when youth have no comparable ES resources available in the community. YES can continue to be provided until: Comparable benefits become available (External funders are identified) OR YES is provided for four years OR The individual reaches the age of 25 and no longer qualifies under the definition of 'youth'. The Division does not provide Extended Services to customers 25 or over as this is an explicitly prohibited activity under WIOA. Youth extended services are only available to youth with most significant disabilities using Titles I and VI funding; and supported employment services are only available to individuals with most significant disabilities.

Supported Employment services under IDVR are only offered by qualified providers as identified in section (e): Cooperative agreements with private/nonprofit organizations.

IDVR is committed to the advancement of opportunities for Idaho citizens with disabilities, including youth with the most significant disabilities, and encourages employment in the least restrictive and most integrated environments possible. IDVR has established and continues to maintain strong working relationships with pertinent state agencies such as the Department of Health and Welfare (H&W). Under H&W, Home and Community Based Services (HCBS) Waiver and Aged and Disabled Waiver are the two main extended services funding sources for Idahoans in need of Supported Employment. The third funding source is the Extended Employment Services Program. This program is funded through State appropriations only. The primary service providers for long term supports under the three main funding sources are CRPs.

IDVR utilizes the State's Extended Employment Services program as well as the Medicaid Home and Community-Based Services (HCBS), and Aged and Disabled (A&D) waivers for long term support. The Division will continue to work closely with each program overseeing these resources to streamline our referral process and improve utilization of this external source of extended services funding. The following provides more detail on the working relationship between each ES entity and IDVR.

IDH&W provides the following guidance on extended services under IDVR's Health & Welfare banner:

The Supported Employment Agency Recommendation must be completed by the Idaho Division of Vocational Rehabilitation (IDVR) when transitioning from vocational rehabilitation services or by the Supported Employment Agency (Community Rehabilitation Provider) identified on the plan or addendum. Documentation must include:

- Amount of Service
- Level of Support Needed
- Employment Goals
- Transition Plan

IDVR provides funding for job development services and initial job coaching through a Community Rehabilitation Provider (CRP) agency. The length of time needed for job development varies depending on the individual. As soon as the person has become employed, it is critical to work quickly to ensure there is no gap in the individual's job coaching support in the workplace. The CRP will communicate to the Service Coordinator/plan developer that the participant has been hired so planning for transition to Medicaid-funded Supported Employment services [extended services] can begin. An Employment Agency Recommendation form has been developed to help with the transition process. It includes information from the

CRP agency about the participant, their job tasks in the workplace, and a recommended level of service needed by the participant. This information will be used by the plan developer to complete an addendum to the ISP. A transition meeting will be called and facilitated by the Vocational Rehabilitation Counselor. This meeting should include the Service Coordinator/Plan Developer, guardian, and any other identified members of the Person-Centered Planning team to ensure all parties understand the shift to Medicaid Waiver Supported Employment and any signatures can be gathered as needed for addendum or plan development. IDH&W refers to CARF and RSAS (or equivalent) accreditation requirements in order to receive waiver funding.

EES extended services are provided under EES policy which requires the certification of an extended employment service provider. These providers are approved by the EES program administrator on a case-by-case basis. All EES approved providers are also CRPs which are initially approved as CRPs under IDVR's accreditation requirement.

If a youth with a disability has been determined to need an SE strategy and an extended service funding source is not available yet, IDVR will utilize VR funds for the required timeframes or until the funding becomes available for the long-term support.

The Division has developed policies to ensure that Youth Extended Services (YES) can be provided up to four years as needed for IDVR customers under the age of 25 following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. Upon exhaustion of Title VI funds reserved for youth supported employment, the Division will continue to support YES with Title I funds, as required by WIOA, and will continue to leverage other sources of extended services. YES funds are considered only when external sources of extended services funding are immediately unavailable and would unnecessarily interrupt the continuity of services.

IDVR supports the utilization of Natural Supports where available and encourages the development of Natural Supports for all SE customers. Natural Supports are supports and services typically available to other employees OR supports created to provide supports through people or other resources typically available in the work, home, and community environment.

Stakeholder commitment for Natural Supports include a Plan for change and the Division encourages a written commitment by the individual providing NS, including contact information for a soft handoff in the event a support loss is anticipated.

The following must be satisfied before VR can close an SE case successfully:

- The individual must have completed SE services and is no longer receiving VR funded services including extended services for youth under VR (those receiving YES remain an open case in the VR system).
- The individual has maintained employment stability for a period of 90 days after transitioning to extended services.
- The job meets the definition of CIE.
- The job is consistent with the vocational goal specified in the IPE.
- At the end of the 90 days the customer and VRC agree that the customer is performing well in employment (a lack of employer agreement would indicate instability).
- The individual is informed, through appropriate modes of communication, about the availability of Post-Employment Services.

G. COORDINATION WITH EMPLOYERS

1. VR SERVICES; AND

IDVR continues to provide coordination of employer related outreach efforts within the Division and coordinated services under the aegis of WIOA through partnerships with Titles I-IV and other combined state plan partners. IDVR continues to evolve services provided to business and has plans for the continued growth and expansion of the business relations team, additional training for IDVR staff, increase the array of services provided to business, as well as improving the coordination services to business with WIOA plan partners.

IDVR continues to engage in coordinated business services internally through the Business Engagement Leadership Team (BELT). This team continues to be comprised of at least one IDVR staff representative from each region with the activities of the team directed by the Business Relations Manager. Regional Manager representation is present within the team with two of eight Regional Managers participating in a supportive role.

IDVR completed strategic planning sessions in the fall of 2020 to identify the next steps needed to further develop and increase agency performance in serving business customers. The following groups were represented in this process:

- IDVR including Vocational Rehabilitation Counselors, Regional Managers, Vocational Rehabilitation Assistants and Central Office personnel.
- Idaho Commission for the Blind and Visually Impaired personnel,
- State Rehabilitation Council members,
- Representative from the Workforce Development Council

The strategic planning sessions occurred across four different sessions where the agency's business engagement activities were discussed, evaluated, and identified needs were prioritized. Following the strategic planning sessions, the information gathered was compiled and summarized into a working plan.

The goals of the developed working plan identified various areas of focus over the next five years to include but are not limited to:

1. Implementation of minimum performance expectations for each IDVR job category identified,
2. Increase staff competency when connecting with business and providing services,
3. Develop a communication plan for business engagement,
4. Establish the Division as a valuable resource to business
5. Develop a strategy for completing business engagement activities with outside agencies and partners, and
6. Increase overall agency business engagement performance.

Significant Division progress towards these goals has been made since the development of the working plan.

IDVR has revised the identified job descriptions to include business engagement into the job classification descriptions. Additionally, Regional Business Engagement plans were developed and implemented with an outline of goals for business engagement which focus on the utilization of a team approach within each region that allows staff to participate in business engagement activities in various ways leveraging their individual strengths.

Division staff competency has been increased through addressing training needs at the regional level as identified in each Regional Business Engagement plan, as well as training delivered by the Business Relations Manager. Training needs for the BELT have been identified at a regional

level by the Business Relations Manager based upon review of regional performance and self-reported staff needs. Additionally, a formal training outline has been developed for new staff.

A Division communication plan is being developed to promote better quality and utilization of business engagement information. In line with the plan, an internal Employer Information page was created to house business information and promote data accessibility for Division staff. Additionally, periodic updates from the Business Relations Manager are provided to individual regions. Furthermore, the Business Relations Manager has completed visits to each region to learn more about localized needs.

The Division continues to strive to become a dependable and useful resource for business. The Division hosts 'Jobs in Idaho' page as an employer recruitment resource. Additionally, the Business Relations Manager conducts a business needs assessment to better tailor planning to achieve the Division's business goals. To this end, the Division has implemented Business Spotlight Sessions which allow businesses a platform to share information about their business and their needs in a group setting. Business Spotlight attendees include IDVR, ICBVI, DOL, Department of Veterans Affairs, Oregon Division of Vocational Rehabilitation, Oregon Commission for the Blind, Washington Division of Vocational Rehabilitation, and Utah Division of Vocational Rehabilitation staff.

IDVR is striving to increase customer outcomes through a business apprenticeship strategy. IDVR will be hiring a dedicated Apprenticeship Coordinator to further develop this service to business as a collaborative pilot in conjunction with the Idaho Department of Labor Apprenticeship team, and the Idaho Department of Correction to ensure these services meet the needs of business, while expanding the quality and scope of career opportunities available to IDVR customers. IDVR has initiated discussions on the apprenticeship development program with businesses and is working to connect interested businesses with an apprenticeship support team.

The Division has developed strategies to increase the unified approach for completing business engagement activities with outside agencies and partners including but not limited to:

- Significant engagement with the One-Stop teams across Idaho with WIOA partners
- All IDVR staff completed IDOL's Technical Assistance Training for Unified Business Services with other Idaho WIOA business leads.
- Interfacing with other states to gain best-practice guidance on Business Engagement approaches. Partners include Washington VR, Utah VR, Oregon VR, and Oregon Blind all participating to promote better services to businesses operating with a multistate footprint.

Due in part to the efforts describe above, Idaho has realized an increase in the variety and quantity of services provided to businesses. Division staff are providing more support to businesses across Workforce Recruitment Assistance, Training Services, and Accessing Untapped Labor Pools than in prior years.

Reported services to businesses have increased as indicated by the following year-over-year trends. Additionally, significant effort to improve the volume of actual services offered to business are realizing substantial gains.

Actual Services to Businesses PY 2018-current

- PY 2018 21.2% or 108 services
- PY 2019 18.7% or 154 services
- PY 2020 28.2% or 233 services

- PY 2021 *38.5% or 542 services

*(incomplete PY as of 5/31/2022, percentages listed are of total contacts to business)

Additionally, quality relationships with business and number of services provided to business customers are expected to continue to grow with the outlined goals related to quantity and quality of engagements with business in each Regional Business Engagement plan and through continued implementation of the Division's Business Engagement Strategic Plan.

IDVR is in the process of developing additional opportunities for our customers through our increased business engagement efforts. IDVR is working with Create Common Good to develop an agreement for a paid work-based learning experience to be available to IDVR customers year-round that would allow IDVR customers to gain valuable skills to then gain employment with local employers. Additionally, IDVR is in preliminary discussions with WinCo to develop a work-based learning experience for one of their warehouse positions that would allow individuals to gain work skills and be competitive applicants for their openings or in related positions with other local employers.

IDVR is currently evaluating the potential expansion of the Business Relations team to improve the quality of services provided to business, with expanded capacity to provide additional services. This evaluation is for the purpose of determining the capacity required to allow the Division to meet the vision of the program and to align with the goals under WIOA to increase employer services and partnership with WIOA partners at the local level to allow for increased and effective collaboration.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

The age requirement for a student with a disability who can receive Pre-ETS for Idaho Title IV WIOA programs is 14 years old to not older than 21 (up to the individual's 22nd birthday), effective this state plan.

IDVR works with employers to provide the five required Pre-Employment Transition Services and Transition services to both students and youth with disabilities in a competitive integrated setting. The Division provides a coordinated set of transition activities that are outcome oriented and promote movement from school to post-school activities, including postsecondary and vocational training, career exploration, in competitive integrated employment. Other transition services we provide include working with employers to provide job shadows, individual work-based learning experiences and when needed for IDVR youth customers, job-related services, job search and placement assistance, job retention, and follow-up and follow along services.

The Division provides transition services as "group services" or as "individualized services". Group transition services are provided to potentially eligible students; group transition services may also be provided to eligible students and youth with disabilities. Individualized transition services are provided to students through a pre-case or to youth who have been determined eligible and have an IPE.

Within the Regional Business Engagement plans the provision of business services includes identifying and working with businesses to promote and expand opportunities for students to gain work experiences prior to graduation from high school. IDVR has worked directly with employers to provide students with up to 150 hours of paid work-based learning experiences with employers in the community. To further build on this, IDVR is in the process of identifying a communication system to house general information on businesses that have identified as willing to partner to host students for these experiences to ensure ease of communication and understanding of business partners and what experiences that are able to offer students. Additionally, the Division is in the beginning stages of implementation within the internal

Employer Information Pages, to house detailed information on employers that have expressed interest in hosting multiple students for work experiences, tours, job shadows, or informational interviews over time. This information is being compiled and housed in this destination to assure the information is accessible to all Division staff that would benefit from access to this information on businesses willing to host students for these experiences.

The Business Spotlights that have been completed have also served as a platform for Division staff to connect and learn about opportunities for students and youth with the various businesses that have been highlighted in these sessions. Businesses have been able to communicate with Division staff their ability to support programs such as work experiences, and answer questions regarding their capabilities to support and host students during these sessions.

IDVR is in the process of developing a training video to assist IDVR staff with communicating effectively with businesses regarding these opportunities for students. This training video will give staff an example of how to approach businesses and communicate effectively regarding these work-based learning opportunities for students and youth.

IDVR has developed a survey for business partners and was provided to business partners that hosted students during the 2021 Summer Work Experience program across the state. Once feedback is gained, it will be utilized to make changes aligning with the needs of business to better provide this service to students while meeting the needs of businesses as the host site for the experiences.

H. INTERAGENCY COOPERATION

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

The Idaho Department of Health and Welfare (H&W) maintains all related programs in the state including the state Medicaid program, the state Developmental Disabilities Program, and the state Mental Health program. Under Medicaid H&W operates the Idaho Home and Community Based Services project.

IDVR has collaboratively developed an agreement with H&W as it relates to Title XIX of the Social Security Act. This agreement was implemented July 1, 2020.

Collaboration with H&W has been significant in the area of supported employment. We have a process that easily and conveniently identifies what services customers are eligible for through approved Medicaid Waivers. This occurs through an individual release of information, but the process is agreed upon by both agencies and is very timely. This provides IDVR with timely understanding of services that can assist an individual with the VR process, employment needs and a funding source if extended services are necessary to maintain employment. Additionally, IDVR has participated over the past 2 years with a Health and Welfare driven "Community Now" engagement with all stakeholders and individuals that access services through Health and Welfare. The focus was on expansion of services through Medicaid that supports living and working in their community. IDVR has been able to provide significant input to ensure that the two programs complement each other and support successful employment services and outcomes. IDVR and H&W have also had trainings to support the VR staff on Medicaid services and benefits. This training assist IDVR VR staff to assist customers and families identify how those services can support success in an employment outcome.

The agreement outlines joint responsibilities, eligibility criteria, referrals, financial responsibilities, confidentiality provisions, and accountability and controls for IDH&W and IDVR.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

IDVR has a solid working relationship with the Adult Developmental Disabilities Services (ADDS) program under the Department of H&W. There currently is no formal agreement. IDVR's collaboration with H&W has been significant in the area of supported employment. A significant portion of the SE population are individuals with developmental disabilities. IDVR and ADDS has a process that easily and conveniently identifies what services customers are eligible for through Medicaid Waiver. This occurs through an individual release of information, but the process is agreed upon by both agencies and is very timely. This provides IDVR with timely understanding of services that can assist an individual with the VR process, employment needs, and a funding source if extended services are necessary to maintain employment. Additionally, IDVR has participated over the past two years with a Health and Welfare driven "Community Now" engagement with all stakeholders and individuals that access services through Health and Welfare. The focus was on expansion of services through Medicaid that supports living and working in their community. IDVR has been able to provide significant input to ensure that the two programs complement each other and support successful employment services and outcomes. IDVR and H&W have also had trainings to educate VR staff on Medicaid services and benefits. This training allows IDVR staff to better assist customers and families to explain how those services can support success in an employment outcome.

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

The IDVR and Health and Welfare (H&W) Behavioral Health no longer have a formal agreement. Due to the States shift in the delivery of behavioral health services to a community model, IDVR is no longer has designated staff to work directly with H&W Behavioral Health. There is IDVR representation on the State Planning Council on Behavioral Health. The purpose of this Council is to "serve as an advocate for adults with serious mental issues, children with severe emotional disturbances, and others with mental health or substance use needs. Expand, improve, notify or transform Behavioral Health service delivery system for individuals with severe mental illness, serious emotional disturbance, and substance use disorders to ensure access to treatment, prevention, and rehabilitation services, including those services that go beyond the traditional behavioral health system. Advise the State Behavioral Health Authority on problems, policies and programs and provide guidance to the State Behavioral Authority in the development and implementation of the State Behavioral Health Systems Plan. Monitor, review, and evaluate the allocation and adequacy of behavioral health services throughout the state not less than once a year. Serve as a vehicle for intra- and inter-agency policy and program development. Present to the Governor and legislature by June 30 of each year a report on the Council's challenges and achievements and impact on the quality of life that Behavioral Health services had on Idaho citizens. The Council will incorporate recommendations for service system improvements submitted by the regional behavioral health boards." Regionally, the IDVR connects with Mental Health and Drug Courts where available. Referrals come to the IDVR regional and sub offices through community behavioral health organizations.

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

1. SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS

I. THE NUMBER OF PERSONNEL WHO ARE EMPLOYED BY THE STATE AGENCY IN THE PROVISION OF VR SERVICES IN RELATION TO THE NUMBER OF INDIVIDUALS SERVED, BROKEN DOWN BY PERSONNEL CATEGORY;

Table VR.1: Qualified Personnel

Job Title	Total Positions	Current Vacancies	Projected Vacancies Over the Next 5 years
Qualified Rehabilitation Professionals Vocational Rehabilitation Counselors and Assistant Regional Managers	44	8	26
Vocational Rehabilitation Specialists	19	0	0
Vocational Rehabilitation Assistants	43	3	10
Field Management Staff	8	0	2
Human Resources	2	0	0
Fiscal	4	2	2
Staff Trainer	1	0	0
Planning and Evaluation	5	0	1
Transition Coordinator	1	0	0
Business Relations Manager	1	0	0
Administrative Assistants (Central Office Support)	2	0	1
Deputy Administrator	1	0	0
Administrator	1	0	0
Chief of Field Services	1	0	0
Business Operations Specialist	1	0	0
Community Rehabilitation Program Manager	1	0	0

IDVR currently employs a total of 148 staff. The breakdown of personnel is listed above.

Idaho's population by percent grow more than any other state between 2020 and 2021 at a rate of 2.9 percent which was 9th overall in numeric growth for all states, however the Division plans to continue operating under its current FTE allotment. The Governor is not currently supporting any increase of FTEs for non-K-20 educational programs.

The agency continues to operate under 148 FTEs but does reallocate FTE(s) to meet emerging needs where necessary. The following reallocation has occurred since the last iteration of the plan.

Current FTE allotment has been reorganized since the 2020 plan. FTE changes include:

- A Business Operations Specialist position was created to oversee contracts

- The Community Rehabilitation Program Manager position was created to help with the innovation and expansion activities and subsequent ongoing quality improvement of CRP services.
- The Business Relations Liaison position has been reclassified to a Business Relations Manager position as the scope of the position has increased.
- Three QRP FTE have been identified as Area Transition Counselors who serve the specific needs of coordinating and delivery of Pre-ETS across their local areas. These positions were necessitated by WIOA changes.

IDVR has had significant challenges recruiting and retaining qualified staff over the past several years and this has been even more evident over the past year. To increase IDVR's effectiveness in hiring and retaining qualified staff especially for the QRP positions the following strategies have been implemented or will be within the year:

- Flexibilities in work schedules
- Tuition and allowed work time for schooling requirements for staff working to achieve CSPD standard
- Paid Internship opportunities for students that meet CSPD Education credentials
- Collaborating with Division of Human Resources to demonstrate need for increased wages for State employees to be competitive
- Improved Job Announcements

Additionally, effective 11/29/21, IDVR implemented a two-pronged QRP Stabilization Program:

1. Retention bonuses for all staff in the titles of Regional Manager, Assistant Regional Manager, Sr. Vocational Rehabilitation Counselor and Vocational Counselor in exchange for a two-year service commitment dating from the payment date of the bonus (12/23/21), and

A three-tier sign-on/recruitment/retention program for new hires into the aforementioned titles, payable in the second paycheck after hire, after passing probation (1040 hours of service) in exchange for one-year service commitment, and upon completion of one year of employment (2080 hours of service) and satisfactory performance with a one-year service commitment from the final bonus payment date. At the present time, we are only recruiting for QRPs to fill counselor vacancies, regardless of whether the prior incumbent was a Vocational Rehabilitation Specialist (underfill for the VRC position).

II. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

The current vacancies broken down by personnel category can be found in Table VR.1: Qualified Personnel in the preceding section of this plan.

III. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES IN 5 YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.

Projected vacancies by personnel category and the rationale informing these projections can be found in Table VR.1: Qualified Personnel and the subsequent narrative which is located in i.1.A.i. of this section.

B. PERSONNEL DEVELOPMENT

I. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM;

The University of Idaho was the only institution of higher education in the State that offers a VR program in Idaho. However, in 2020 the University sunset this program.

Idaho State University was approved by the Idaho SBOE in November 2019 to begin a new Master of Counseling specialty program: Clinical Rehabilitation Counseling. This program began fall of 2020 and is offered in two Idaho locations (Meridian and Pocatello). The program has the ability serve 24 full-time students.

II. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

Idaho State University was approved by the Idaho SBOE in November 2019 to begin a new Master of Counseling specialty program: Clinical Rehabilitation Counseling. This program began fall of 2020 and is offered in two Idaho locations (Meridian and Pocatello). The program has the ability serve 24 full-time students.

III. THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.

The Idaho State University Program has not yet graduated any students since starting the new program with their Fall 2020 cohort.

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

IDVR will continue to recruit qualified staff from Rehabilitation Counselor Education programs. We maintain contact with Auburn University, Hofstra University, Montana State University, New Mexico Highlands University, Portland State University, San Diego State University, University of Arizona, University of Kentucky, University of North Texas, University of Northern Colorado, University of Texas Rio Grande Valley, University of Wisconsin - Stout, Utah State University, Virginia Commonwealth University, West Virginia University, and Western Washington University. Management staff also attends the Fall and Spring National Council on Rehabilitation Education (NCRE) conferences for recruitment (when feasible).

Additionally, IDVR supports paid and unpaid internships for master's level students in Rehabilitation or related fields. IDVR continues to face challenges in recruiting qualified applicants. The entry-level wage for a QRP is lower than comparable state and private positions. IDVR has increased wages for QRP's in Calendar Year 2021. IDVR a implemented a recruitment and retention bonus program to increase the potential for hiring QRPs as well as retain current QRPs. It is too soon to determine what impact, if any this program will have on QRPs for the agency.

IDVR conducts exit interviews with staff, when possible, to determine whether there are areas of concern affecting staff retention. The current trend suggests counselors are leaving VR for positions which do not require a master's degree and/or are paid more per hour. This trend has continued. Idaho has a very low unemployment rate and the wages have increased significantly in the private sector. As a State agency we are not as nimble in wage movement. For PY 2020 the turnover rate for the rehabilitation counselor position was 23 percent.

As of June 2022, it is less than six months since QRP retention bonus implementation. The Division believes that the strategy has had a preliminary positive impact on the retention of QRP

as the Division has only experienced one QRP resignation since implementation of the retention strategy. Two QRP have been hired since implementation under the recruitment bonus strategy.

3. PERSONNEL STANDARDS

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

The State of Idaho does not have a state licensure for rehabilitation counseling. IDVR's personnel standards satisfy Federal requirements as outlined in 34 CFR 361.18(c).

IDVR has established two QRP levels: Vocational Rehabilitation Counselor (VRC) and Vocational Rehabilitation Counselor Senior (VRC Senior). The standards that satisfy the Agency's Comprehensive System of Personnel Development (CSPD) policy for VRC positions are as follows:

1. A current Certified Rehabilitation Counselor (CRC) designation obtained through the Commission on Rehabilitation Counselor Certification (CRCC). OR
2. Confirmed eligible (from CRCC) to take the exam to become a CRC. OR
3. Graduation from a program accredited by the Council for Accreditation of Counseling and Related Educational Programs (CACREP) with a master's degree in Rehabilitation Counseling. OR
4. A current Licensed Professional Counselor (LPC), Licensed Clinical Professional Counselor (LCPC) or Licensed Clinical Social Worker (LCSW) designation issued by the State of Idaho Bureau of Occupational Licensing (IBOL); Rules of the Idaho Licensing Board of Professional Counselors and Marriage and Family Therapists, IDAPA 24.15.01.

The standard for the VRC Senior position that satisfies the Agency's CSPD policy is a current Certified Rehabilitation Counselor (CRC) designation obtained through the Commission on Rehabilitation Counselor Certification (CRCC). The LPC or LCPC designation does not meet the CSPD requirement for a VRC Senior.

Requirements to meet CSPD for staff hired at Vocational Rehabilitation Specialist (VRS) level and maintain employment eligibility include the following:

The VRS will be required to meet IDVR's CSPD standard within five years of the staff member's hire date.

1. The VRS, with assistance from Regional Manager (RM), will develop a CSPD Plan within six-months of hire date to be reviewed for approval by Human Resources. Each CSPD plan will require the following elements:
    a. Educational requirements necessary to complete CSPD (if applicable). Number of courses required and an outline of anticipated timeframe for completion of each course.
    b. As the coursework is completed grades must be submitted to the Regional Manager and Human Resources within one month upon completion of term.
    c. Employment internship or work experience requirement necessary to complete CSPD (if applicable).
    d. Official acceptance documentation should be submitted to Regional Manager and Human Resources.

e. Acceptance of RSA scholarship (if applicable).

f. Estimated cost of tuition and books.

g. Outline of timeline for completion from the university.

2. CSPD will be evaluated for progress as part of the VRS overall performance requirements as outlined in the VRS job description each year.

3. The VRS is expected to meet periodically with their manager until the CSPD plan is implemented. The manager will submit a monthly report to HR, which will provide a summary of progress.

4. Staff members at VRS level will be required to produce adequate semester progress to Human Resources for their personnel file.

When IDVR experiences a limited number of recruits for a QRP positions the agency will consider hiring individuals into the VRS classification.

IDVR requires a CRC for all Regional Manager or Assistant Region Manager positions.

IDVR will reimburse the cost of the CRCC application and testing fee upon verification of achievement of CRC certification, when funds are available.

IDVR will recognize current standards as outlined in the CRC Certification Guide when determining qualifying degrees, programs, coursework and acceptable employment experience. http://www.crccertification.com/.

The agency will annually review and evaluate if financial assistance can be provided to support VR Specialists (VRS) that are working towards meeting CSPD. HR will notify all VRSs at the time IDVR determines that financial assistance is available. The notification will specify the time frame and process on how to obtain the financial assistance offered.

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.

IDVR is committed to providing all employees with professional development opportunities which will enhance employee job performance; support the Agency's mission, values and goals; and lead to successful employment outcomes for individuals with disabilities.

IDVR has established education and experience requirements for each position in the Agency with a focus on alignment of requirements contained in section 101(a)(7)(B)(ii) which meet or exceed the standards required in 101(a)(7)(B)(ii)(I)-(II) including a requirement for a master's or doctoral degree in vocational rehabilitation or a related field to be recognized as a qualified rehabilitation professional at IDVR. When unable to hire VRCs, the Division supports a Vocational Rehabilitation Specialist position with fewer requirements (explained under 3(a) in the preceding section, but requirements which are specifically outlined to meet the conditions of the 21st century workforce understanding.

IDVR hires with a preference for people who have experience working with people with disabilities, particularly around advocacy and providing direct support.

With the increased WIOA emphasis on workforce development the Division will also concentrate on providing training to strengthen business relationships and increase knowledge of labor market relevance and employer needs. IDVR will establish ongoing requirements to participate in continuing education around a 21st century understanding of the workforce

including periodic updates on LMI and career pathways and evolving regional labor trends and expectations.

Through an increased emphasis on data-driven decisions, IDVR will increase utilization of the most recently available labor market information to best inform customer vocational decisions.

4. STAFF DEVELOPMENT

A. A SYSTEM OF STAFF DEVELOPMENT FOR PROFESSIONALS AND PARAPROFESSIONALS WITHIN THE DESIGNATED STATE UNIT, PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

IDVR tracks and monitors each employee's individual training and development. Special emphasis is placed on training in those areas of need as indented by the case file review and emerging field needs and as prioritized by the executive leadership team and the SRC. Additional priorities include training required to maintain CRC and/or LPC certification. Training for staff also includes the following topics: ethics, disability related topics, vocational counseling, assessment, job placement strategies, and assistive technology.

B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.

An annual training needs assessment is conducted to determine personnel training needs. Individual employee skill sets, position descriptions, and position duties are also assessed to identify areas that require further development. In addition, organizational needs are analyzed to identify areas in need of succession planning, to expand those employee skills essential to provide effective services to special populations, and to meet job demands. Information gathered from employee performance evaluations; supervisory feedback, employee exit interviews, and internal monitoring results also assist the Division with identifying areas of need.

In 2020, IDVR revised its policies and procedures that impact service provision to IDVR customers. All field staff received eight hours of training on the updated Field Services Manual in January 2021 prior to statewide implementation in February 2021. In addition, all Counselors received four hours of training specific to federal eligibility and comprehensive assessment requirements in March 2021. Staff continue to receive Field Services Manual updates state-wide on a periodic basis, however the frequency and intensity of updates is expected to lessen following a major overhaul of the FSM structure and presentation.

IDVR held new field staff Motivational Interviewing (MI) training in 2021. Two separate four-day sessions were held with Session 1 occurring June 1-2 and repeating June 29-30. Session 2 for new employees was held on August 6-7 and again on September 4-5. Providing Motivational Interviewing training for staff continues to be an evidence-based agency strategy.

In September 2021 IDVR held its annual statewide in-service. Topics for our general session included an overview of WIOA's Other Measures That Matter and review of IDVR and national state-federal VR performance indicators. Breakout session topics included Informed Choice Counseling, Case File Documentations, Behavioral Ethics, Trauma-Informed Communication, and an ADA Overview.

Throughout the year, training requests are approved for individual and group training in areas of interest or need. A variety of platforms are utilized for dissemination. In 2021, most Division group trainings were held virtually, as are most external training opportunities. The Division continues to provide individualized training in-person whenever feasible. Topics/conferences

included but were not limited to: Ethics, the Idaho Conference on Alcohol and Drug Dependency, Tools for Life, counseling theories and techniques, assistive technology, Programmatic and Physical Accessibility, disability-specific trainings, and various annual conferences for rehabilitation professionals (e.g., NRA, NCRE, CSAVR, or the Summit Group). The Division continues to be a strong advocate for continuing education participation when relevant training is identified, particularly where training can impact the service delivery of public vocational rehabilitation services.

Through an RSA grant administered by The Center for Innovative Training (CIT-VR) at The George Washington University, the Division continues to require all field staff to complete the VR 101 course. This 15-hour course provides an overview of state-federal VR programs to help staff understand the history, scope, and purpose of the state-federal vocational rehabilitation program. This training is available until Spring 2022. The Division continues to work with CIT-VR to develop and disseminate timely and appropriate trainings relevant to public vocational rehabilitation counseling.

Internally, optional trainings are provided once a month on current procedures and processes. Common topics include but are not limited to fiscal issues, instruction on Pre-ETS, and the navigation and functions of the AWARE case management system.

Succession planning and leadership development continue to be a focus for the Division. All Central Office and Field Services Managers complete a Supervisory Academy offered by the Idaho Division of Human Resources. The academy includes 10 modules on Performance Management: Development, Coaching and Feedback, Expectations, Motivation, Documentation, Calibrating Ratings, Evaluation, I-Perform (performance evaluation software program), and Progressive Discipline. When financially able the Division supports staff in the Emerging Leaders series. The Division utilizes permanent Assistant Regional Manager positions throughout the state to support succession planning and leadership development.

New VR staff participate in a new employee orientation which is provided online, by Central Office staff, the immediate supervisor, and other designated employees. New VRAs also participate in an online series designed for paraprofessional staff. The course covers the History of VR, Basic Ethical Considerations, Navigating Sticky Situations, Developing Collaborative Relationships, and Cultural Diversity.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

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

IDVR provides or purchases interpreter or language services required to access the program.

The Agency is currently working with the Division of Human Resources to determine a process and standards to assess staff competency in Spanish or other foreign languages. If staff meet competency standards, they may work with and interpret for customers who's primarily language is other than English.

IDVR has created a statewide counselor position for the deaf. This position will better serve individuals who are deaf and increase the overall effectiveness of our service delivery for this underserved population. The position filled last fall and has passed certification and is now receiving referrals as of January 2022.

Since Idaho has a separate entity that addresses issues related to low vision and blindness, IDVR does not provide specific training to its staff in braille, but instead refers customers who require braille to the Idaho Commission for the Blind and Visually Impaired.

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

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

The Transition Coordinator will facilitate the required coordination with the State Department of Education and provision of Pre-employment Transition Services, as required under WIOA.

The Transition Coordinator has extensive knowledge of IDEA personnel qualifications, under 34 CFR 300.156. Training and education will be identified for staff regarding service provision, coordination, and best practices in serving students with disabilities. The Transition Coordinator is assigned as an active member of the Idaho Interagency Council on Secondary Transition and the Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This Council works to ensure that training needs are adequately identified and then addressed through shared training opportunities.

Training opportunities offered by IDVR which are relevant to both educators and vocational rehabilitation professionals will be opened to school staff for participation when practicable. For example, in the fall of 2021, IDVR brought together public educators and VR Transition staff at the Transition Institute. The Transition Coordinator facilitates monthly Transition Leadership team meetings where changes are shared with the Leadership Team. The Team takes the information from the meeting and shares it with their regions. The Transition Coordinator also provided In-Service breakout session on Pre-ETS available to all staff. Finally, the Transition Coordinator participates in Special Education Advisory Panel for the State Department of Education.

J. STATEWIDE ASSESSMENT

1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

The number of people with disabilities in Idaho is growing. The American Community Survey (ACS) one–year estimates of individuals with disabilities in Idaho increased from 204,780 in 2014 to 241,391 in 2019 representing an increase of 3.38 percent year over year, and 17.9 percent over the past five years (ACS Disability Characteristics, 2014, 2019 1–Year Estimates).

According to data from the American Community Survey (2019), 13.7 percent of Idaho civilians living in the community report having a disability (one percent higher than the national average), including 8.9 percent of Idahoans age 18-34, and 13.6 percent of Idahoans age 35-64. A more extensive profile of Idahoans with Disabilities is contained in section II(a)(1)(B) Workforce Analysis portion of the combined section of this plan.

The Division has hired a CRP manager who will have a full commitment to the position following the transfer of his former program to the Idaho Department of Health and Welfare on July 1, 2022. To date the CRP manager has engaged with VRTAC-QE and is currently creating a project management plan to formalize activities and timelines for the CRP innovation project.

Since the Division concluded our initial CE Pilot, IDVR has continued to participate in the Supported Employment and Customized Employment Communities of Practice hosted through Cornell and the George Washington University/Vocational Rehabilitation Technical Assistance Center for Quality Employment (VRTAC-QE). Additionally, the Division participates in Region X

(Former RSA Region X) Community Rehabilitation Program groups with other CRP program staff in Alaska, Idaho, Oregon, and Washington.

The Division will continue I&E planning activities into PY22 but anticipates initial engagement with CRPs to collect comment and suggestion on I&E prior to formalizing a plan of action for these activities. The Division is also focused on the expansion of rural service delivery options for customers and expanding existing service delivery in urban areas where lacking. IDVR has proposed a modification of qualifications for potential CRPs including a new option where smaller operations can more easily qualify as an IDVR provider through completion of the 40-hour ACRE training. The Division is anticipating the rule change to be approved but must engage in Idaho's negotiated rulemaking process prior to finalizing rule and initiating the change. This strategy should help improve provider coverage across the state and lessen time to service for customers in areas lacking sufficient current coverage.

As a result of CE pilot difficulties, the Division plans on a more granular implementation of CE concepts and principles to further CE efforts in a meaningful and achievable strategic approach. IDVR will focus first on efforts to reinforce and improve core CRP services with innovation and expansion activities (to include job skills, training, job coaching and soft skills). As the Division reimagines our guidance on assessment services, CBWE and trial work, IDVR will infuse aspects of discovery to better condition service providers for more advanced CE concepts. Once the Division is satisfied with the quality of service in the initial phase, we will engage in continuous quality improvement and adaptation until the service reaches fidelity to articulated standards. IDVR will then move to reinforce other aspects central to Customized Employment following stage 1 mastery.

IDVR has a member on the Idaho Behavioral Health Planning Council (IBHPC). The IBHPC mission is to "promote advocacy, collaboration, education, and policy development to create a seamless behavioral health delivery system."

The current IBHPC strategic direction includes:

1. Provide oversight and coordination of regional behavioral health boards.
2. Fulfill reporting requirements.
3. Support the development of community crisis centers in each region.
4. Conduct a statewide assessment of prevention programs.
5. Assist regions in setting up children's subcommittees.
6. Educating legislators.
7. Conducting an environmental scan of the readiness and capacity of the system to ultimately generate strategies to improve continuity of care.

https://healthandwelfare.idaho.gov/about-dhw/boards-councils-committees/idaho-behavioral-health-planning-council-bhpc

Additionally, IDVR's Administrator has tasked all Regional Managers to develop a regional specific outreach plans including this population. The draft regional outreach plans have been submitted, and since mental health services vary substantially across regions, these plans are tailored to services available in the community. For example, not all regions have a homeless shelter. The Division anticipates a revision and incorporation of best practices across regional plans to further strengthen this strategy.

100 percent of Idaho is designated as a Health Professional Shortage Area (HPSA), specifically for Mental Health services (Idaho Behavioral Health Council, 2021). Idaho Behavioral Health Workforce Plan 2021 is Governor Little's initiative to increase providers of behavioral health services in the state of Idaho. The initiative has engaged VR to help train IDVR customers to be peer support specialists to help fill this gap in service provision.

The Division maintains involvement in mental health courts and drug courts with the frequency of engagement varying across regions (weekly, monthly, quarterly, bi-annually). While mental health outreach remains difficult, the Division has developed rapport with community-based workers to help promote these referrals. Efforts to connect with community based mental health providers continue, and the Division works to offer training on VR services to these vendors.

Additionally, IDVR has engaged with the Idaho Anti-Trafficking Coalition. The Coalition reached out to the Division after analysis showed 83 of 242 individuals, they served in 2021 self-identified as having a disability of some kind. Cognitive, physical or mental disabilities were eventually identified in over 75 percent of victims served. A training was provided to all field staff regarding services and support, and the Division helped clarify what services and opportunities were available at IDVR to promote appropriate referral. IDVR maintains a similar relationship with the Idaho Coalition Against Sexual & Domestic Violence.

IDVR commissioned a Comprehensive Statewide Needs Assessment (CSNA) beginning late summer of 2019, including an assessment of the rehabilitation needs of youth with disabilities in transition and student need for Pre-Employment Transition Services. The CSNA was finalized in early 2020 and was retained to inform this two-year update.

The independent CSNA identified the following themes in the area of needs of individuals with the significant disabilities including their need for supported employment:

- Supported Employment is a necessary service for people with the most significant disabilities and needs, which IDVR has been successfully providing for many years. Changes due to WIOA has created some challenges in implementing new practices, but overall IDVR excels in this area.
- Participants expressed that there is a need to improve the quality of employment outcomes for individuals with the most significant disabilities.
- Customized Employment is seen as an important employment strategy for individuals with the most significant disabilities. Training in CE has been completed in partnership with the WINTAC, but it has not been sustainable to date. Many participants indicated that they are looking forward to the implementation of CE 2.0 after IDVR revamps the training, expectations and fee structure.
- The rehabilitation needs of individuals with the most significant disabilities that were cited the most frequently (beyond SE and CE) include transportation, job skills, training, job coaching and soft skills.

Individual Survey: Barriers to Obtaining or Keeping a Job

Respondents were presented with a list of 16 barriers to obtaining employment and asked to indicate whether the item had been a barrier that impacted their ability to obtain or keep a job. The table below summarizes the most frequently stated barriers and the impact on obtaining or keeping employment.

Barriers to Obtaining or Keeping Job	Percent Reporting Barrier
Employer concerns about my ability to do the job	55.3%

Barriers to Obtaining or Keeping Job	Percent Reporting Barrier
due to my disability	
Lack of education or training	53.6%
Mental health concerns	46.3%
Lack of job skills	44.8%
Lack of job search skills	32.3%
Lack of reasonable accommodations at work	29.9%
Lack of assistive technology	24.2%
Concern over loss of Social Security benefits due to working	22.1%
Substance abuse	12.2%

Respondents were presented with a list of barriers and asked to identify the three most significant barriers that they have faced specifically toward getting a job. Table VR.3 contains a summary of the top-three ranked barriers identified by participants and the frequency of identification.

Significant Barriers to Getting a Job	**Times identified as a "top-three" barrier**	**Percent of Total Number of Respondents Selecting Barrier**
Lack of education or training	488	43.7%
Employer concerns about my ability to do the job due to my disability	437	39.2%
Lack of job skills	358	32.1%
Mental Health concerns	319	28.6%
Lack of available jobs	286	25.6%
Criminal record	203	18.2%
Lack of job search skills	163	14.6%
Lack of reasonable accommodations at work	145	13.0%
Concern over loss of Social Security benefits due to working	137	12.3%

A total of 1,116 respondents answered the question. Lack of education or training, employer concerns about my ability to do the job, and lack of job skills were the three top items selected by respondents, matching two of the top three responses in the previous Table X. The last 5 items on this list also resemble the last five items on the list in Table X.

Individual survey respondents were asked a yes-no question asking whether they had suggestions to improve IDVR to help people with disabilities to get a job or move to a better job. There were 285 “yes” responses (23.6%) from the 1,206 respondents.

Respondents were asked a subsequent open-ended question and given the opportunity to provide suggestions on how IDVR can improve in assisting people with disabilities to get a job or move to a better job. Responses to this question that were grouped into the following themes:

1. Provide services in a timely manner
2. Improve VR counselors' communication and customer service
3. Increase medical aspects of disability training to understand a wide variety of disabilities
4. Increase awareness of IDVR and services for customers and employers

Individual survey respondents were asked an open-ended question to provide any additional comments that they would like to share regarding IDVR services. There were 393 narrative responses. Two-hundred two comments were appreciative and positive toward IDVR services and counselors. Themes within the remaining narrative responses noted delays in communication, counselor attitudes, wait times for services, and clarification of services available.

There is a strong correlation between those individuals requiring supported employment (SE) services and presumptively eligible participants in the VR program. To approximate the potential need for SE services, the Division will utilize counts of Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) beneficiaries.

Individuals who qualify for SSI/SSDI are by law presumptively eligible for Vocational Rehabilitation services. The United States Social Security Administration (SSA) estimates that as of December 2020 21,177 Idahoans in the 18-64 age category are receiving SSI.

State or area	Total	Aged	Blind and disabled	Under 18	18–64	65 or older
US	7,959,766	1,136,162	6,823,604	1,108,612	4,556,131	2,295,023
Idaho	30,780	1,689	29,091	4,793	21,177	4,810

Furthermore, Table 8 in the Annual Statistical Report on the Social Security Disability Insurance Program (2020) lists 46,724 Idahoans age 18-64 as SSDI beneficiaries.

According to internal data, IDVR took applications on 2524 cases in PY 2020 including 867 cases where SSI and/or SSDI benefits were verified. This represents a presumptive eligibility rate of 34.35 percent at application, an increase of 2.6 percent over PY 2019.

B. WHO ARE MINORITIES;

The identification and service estimates for minority populations in Idaho are derived from population estimates and internal agency data on customers.

The Hispanic population is Idaho's largest minority group at 12.8 percent, 11 percent of all Idahoans reported Mexican origin with 1.8 percent for all remaining Hispanic origin subcategories. (2019 ACS Demographic and Housing 1-Year Estimate). Internal agency data suggests this population remains underserved representing 8.41 percent of total applications in PY 2019 and 8.76 percent in PY 2020. While the Division is aware of the sustained gap in both applications and plans for this population., it is worth noting that the age distribution for this population skews substantially younger (40 percent of Idaho Hispanics were under age 20, compared to 26 percent of non-Hispanics as of 2019) which may explain some of the discrepancy in applications counts: "As in the United States as a whole, a relatively large share of the Hispanic population in Idaho is made up of children and young adults, with few older individuals. This is in contrast to the non-Hispanic population, which is more evenly distributed

across age groups" (Hispanic Profile Data Book for Idaho – 5th Edition, 2021). This lower average age may also explain why Idaho's rate of disability for Hispanics at 10.3 percent is significantly lower than the statewide average of 13.7 percent. The population pyramid in Idaho's Hispanic Profile Data Book 5th edition (2021) illustrates the extreme skew toward youth in this population. Consequently, IDVR should expect an increasing proportion of Hispanic youth, students and customers as these cohorts age.

Further analysis of outreach and service delivery by race is problematic due to low population percentages in remaining categories, however the following table presets data for Race alone or in combination with one or more other races from latest available ACS Demographic and Housing Estimates (DP05) which best aligns with IDVRs internally available data:

IDVR Service Delivery Rate by Race

	ACS 2019 1-Year	PY 2019	PY 2020
White	92.5%	95.46%	95.50%
Black or African American	1.2%	2.23%	2.41%
American Indian and Alaska Native	2.4%	3.95%	3.30%
Asian	2.5%	1.08%	1.33%
Native Hawaiian and Other Pacific Islander	0.4%	0.56%	0.68%
Some other race	4.5%	--	--

Idaho's demographics are changing, and Idaho was the second fastest growing state relative to population in the past 10 years, with the population growing over 17 percent in the decade (US Census Bureau, 2020). Idaho was the fastest growing state by percentage in the last year, growing 2.9 percent and was ninth in total numeric growth at 53,151 (US Census Bureau, 2021).

While Idaho is traditionally a major state for resettlement in Regions 3, 4, 7 and 8, net international migration has slowed significantly under the COVID-19 pandemic (with the primary driver of Idaho's recent population increase coming from net domestic migration).

In addition to demographic information and internal case management data, IDVR remains informed on the needs of specific minority populations through efforts which are further elaborated on in section 'o', the program specific strategy section of this plan for the Division.

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

According to the latest Comprehensive Statewide Needs Assessment, the most common themes that emerged in this area based on the perceptions of respondents were:

- In general, a case can be made that individuals living in rural areas, with less access to services, support, training and education are underserved.
- Language and culture are barriers to certain populations accessing services or seeking employment, including a growing refugee population in parts of Idaho. Translation services are not readily available.
- Native American tribes live in isolated locales in Idaho with limited employment options.

- IDVR has increased outreach efforts and coordination with partner agencies; however, there is a continued need for outreach to potentially unserved populations.
- Ex-offenders with a high rate of substance abuse issues require services from multiple agencies and face resistance from the employment community.

The WIOA Advisory Group has specifically identified rural service provision a traditionally underserved area to address in II.c.1 of this plan.

The Division utilizes telephone-based translation services when necessary to bridge language barriers presented by Idaho's growing refugee population.

The outreach activities targeted toward Idaho's refugee and minority populations are detailed in section o of the program specific section of this plan for the Division.

The Division notes that the intersection of rural service provision and tribal affiliation can present substantial barriers to obtaining employment in these rural communities and will continue to view this population as underserved. IDVR will continue outreach efforts accordingly for this population.

The Division will continue to strengthen partnerships with entities in the workforce development system to reach populations of interest such as youth.

The Division co-locates with the Idaho Department of Correction. IDVR maintains relationships with IDOC and IDJC and will continue to engage with these entities to further efforts to reach youth and adults in the corrections system across Idaho.

IDVR is a current sub-awardee of the 5-year State Apprenticeship Expansion Equity and Inclusion (SAEEI) Grant that was awarded to IDOL. IDVR's Business Relations Manager is an active member of the Apprenticeship Idaho Coalition and the Diversity, Equity, Inclusion, and Accessibility (DEIA) team under the SAEEI grant. The agency also created an Apprenticeship Counselor/Coordinator position to work on the DEIA team under this grant to support work to reach the grant deliverables around increasing Diversity, Equity, Inclusion, and Accessibility for Registered Apprenticeship Programs in Idaho. In addition to IDVR's members of the DEIA team, the team also includes two members of the greater IDOL Apprenticeship Team, and two positions from Idaho Department of Corrections. The DEIA team is currently evaluating grant deliverables and prioritizing the development of marketing and educational materials for employers and sponsors that discuss the importance and value of diversifying their talent pipelines and workforce. The partnership between DEIA team members will foster positive relationships that will assist both individuals with disabilities and individuals with IDOC involvement to be informed about Registered Apprenticeship opportunities and to be successful in Registered Apprenticeship programs that they enter. However, though those areas are targets of the DEIA team there is an overarching goal of increasing diversity more broadly to include areas of apprentices completing Registered Apprenticeships throughout the state of Idaho.

IDVR has also established a positive working relationship with Idaho Business for Education the sub-awardee of the Idaho Workforce Development Council's Youth Apprenticeship Readiness Grant (YARG) for supporting students and youth in Idaho to have increased knowledge of and access to Registered Apprenticeships across the state. This partnership is working towards the goal of increasing the amount of students and youth who have awareness of and enter into Registered Apprenticeship Programs. Partnership processes have been developed to include monthly meetings, a detailed referral system, an increase in resource sharing, and joint presentations and presence at high schools.

The Division will be sending expert WIOA representation to the annual Idaho Department of Juvenile Correction conference for a panel presentation on core WIOA partners and services available across Idaho's Workforce Development System.

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

According to the latest Comprehensive Statewide Needs Assessment, the most common themes that emerged in this area based on the perceptions of respondents were:

- Overall, partnerships within the Idaho Workforce Development System are regarded as positive and helpful, especially at the administrative level.
- Positive collaboration and partnership aspects include:
    - IDVR inclusion in statewide workforce development listening sessions;
    - Collaborative work on the combined state plan;
    - IDVR administrator is member of the workforce development council and chairs the one-stop committee;
    - IDVR provides consultation (e.g., physical and programmatic accessibility) with the American Job Centers.
- The level of local partnership between IDVR and the American Job Centers was described as varying across the State at the local level. Some felt that co-enrollment was of no concern as it is a common occurrence in small communities, while others felt as though there was no active level of co-enrollment where participants would be served by multiple agencies through strategic partnerships.
- IDVR could improve its collaboration with the Workforce Development System through sharing data, increased cross-referral, leveraging resources, sharing participants, and developing youth program partnerships

The themes described above are informed by VR staff and other partner respondents.

Conversely, the following themes are expressed by individuals with disabilities. The CSNA asked individuals with disabilities several questions regarding the American Job Centers, including accessibility, access to training and employment, the value of and the effectiveness of the services available through the AJC. The table below details results from individuals with disabilities using the Job Center for seeking training and employment.

	Yes	**No**	**Total Number of Responses**
Did you go to the Center to find a job?	68.2%	31.9%	314
Did they help you find employment?	39.4%	60.6%	203

Two-hundred fourteen (68.2%) out of 314 individuals went to the Center with the purpose of seeking assistance to find a job. Two-hundred and three respondents answered the question regarding receiving help that resulted in employment with 60.6% indicating that they did not receive assistance in finding a job.

The majority of the individuals seeking assistance at the AJC were seeking employment (68.2%). Of the 203 respondents, 123 (60.6%) did not find employment with AJC assistance.

Table VR.5 identifies the ratings for the helpfulness and the value of the American Job Centers by individuals with disabilities that responded to the survey.

Value of Services Rating	Count	Percent of Total
Yes, the services were very valuable	105	34.1%
The services were somewhat valuable	122	39.6%
No, the services were not valuable	81	26.3%
Total	308	

Almost 74% of respondents found the services available at the American Job Centers to be either somewhat or very valuable. Just over one-fourth of the respondents indicated the services were not valuable.

Table VR.6 breaks down the reported effectiveness of the American Job Center by individuals that responded to the survey.

Effectiveness Rating	Count	Percent of Total
Very effective	65	20.7%
Somewhat effective	81	25.8%
Somewhat ineffective	40	12.7%
Very ineffective	37	11.8%
No opinion	91	29.0%
Total	314	100%

Only 46.5% of the 314 respondents that answered the question indicated that the American Job Center was effective, while roughly 25% of the respondents indicated that the Centers were not effective in serving people with disabilities and 29% did not have an opinion.

The CSNA provided IDVR several recommendations based on the results of the Needs of Individuals with Disabilities served through other Components of the Statewide Workforce Development System including:

1. IDVR should develop regular opportunities for cross-training among local level WIOA core partner staff to learn about available services and increase the level of co-enrollment across workforce programs to leverage resources and better serve Idahoans with disabilities.

2. IDVR is encouraged to identify effective ways to share client data and develop joint opportunities to increase the level of partnership at the local level.

3. IDVR should continue efforts to improve services for people with disabilities in the larger Idaho workforce system by maintaining partnerships and the level of engagement of IDVR within the WIOA core programs. For example, IDVR can provide ADA training, disability awareness and etiquette training, community accessibility, etc. to workforce agencies as well as community partners.

4. IDVR is encouraged to develop more formal partnerships with the Title I youth program to increase the array of services available to youth in Idaho.

The WIOA Advisory Group, in collaboration with the Workforce Development Council's One-stop Committee will continue to engage in a series of ongoing meetings to identify common and unique strategies which are in need of improvement on a statewide level. The Division engaged in the second strategic planning meeting with all WIOA Advisory Group and the One-Stop Subcommittee members. The purpose of the meeting was to identify the shared goals, priorities, and strategies for this Combined State Plan. While collaborative work in this area has begun, more work in this area is still needed.

Meetings at the local-area level are ongoing which include all core partner agencies and numerous One-Stop partners to determine and advance strategies for common referral and orientation, reducing duplication of effort and potential increased levels of co-enrollment. These meetings will help inform a better understanding of the needs of individuals with disabilities served by agencies external to VR in the One-Stop system.

The Administrator of IDVR currently chairs the WDC's One-Stop Subcommittee.

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

The percentage of Idahoans who experience disability varies significantly by age. While this variance can be attributed to several factors, in general this rate increases over time with substantial increases both early in life as congenital disabilities are initially identified, and later in life as disabilities are acquired through events or emerge due to the natural aging process. While 8.9 percent of Idahoans age 18-34 disability compared to 13.6 percent for those age 35-64, and 24.6 percent of those age 65-74.

Idaho has a higher percentage of workers age 24 and younger than the nation as a whole, this is historically reflected in the percentage of transition age youth served by IDVR. Students and youth under 25 represented 41.44 percent of IDVR cases in PY 2020.

IDVR's 2019/2020 CSNA noted several major recurring themes relating to Pre-ETS and Youth needs:

- Overall, IDVR has successfully implemented pre-employment transition services and has increased opportunities for youth with disabilities to prepare for meaningful employment. Work-based learning experiences have been a particular strength of pre-employment transition services developed through contracts across the state.
- Although the implementation of pre-employment transition services has been successful, IDVR will need to monitor the increasing demands of students, educators and families across the State to ensure that there are adequate resources available to meet the demand.
- IDVR has implemented services to meet the needs of students with the most significant disabilities. Youth with less significant disabilities (e.g., specific learning disabilities) need to have access to IDVR services, with varying levels of support to meet their specific needs. These include disability related services, training and educational opportunities and support, work readiness and job exploration skills.
- A growing number of relationships with educators have been established resulting in increased access to IDVR and other workforce system partners for students and youth. However, a continued lack of understanding and support by parents persists, indicating a need for IDVR to increase direct communication with parents and families of students and youth with disabilities.

One of Idaho's priorities is to collaborate across agencies to increase student participation in services and education that prepare them to participate in their career pathway. To address this

priority IDVR understands the importance of increasing the communication with parents and families to understand youth and students with disabilities and their need for pre-employment transition services and other transition services. The Division is addressing these needs through multiple avenues:

First, IDVR worked with Idaho Parent Unlimited (IPUL), our parent center, to develop a student/family survey to determine the needs of students and youth. This survey is currently being disseminated by the Idaho State Department of Education, IPUL, and IDVR. The survey results will provide both information on the direction of services as well as a collection point for contact information of families of students and youth with disabilities for outreach purposes.

IDVR has also addressed the need to increase communication by including parents and families in Idaho's multi-agency statewide Transition Institute. Having parents and/or family members in LEA transition planning will allow parents greater input into the transition planning process. It will also provide information to families on the unique services available to both students and youth.

Lastly, is the Division's focus to dedicated transition staff via the new ATC and Pre-ETS Counselor positions. The number one priority for Area Transition Counselors and Pre-ETS-Counselors is to provide more outreach to LEAs, higher education, and other youth services. This outreach has led to LEAs having a better understanding of Pre-ETS and vocational rehabilitation. The LEAs have used their increased knowledge to better educate families which impacts participation rates in services. We have already seen that these outreach efforts have led to a significant increase in the number of programs that are available to students, and most importantly in rural communities that have been more difficult to serve. Due to the confidentiality requirements of IDEA, the Division's best approach to connect with students and youth is through the LEAs who are aware of service needs and are best suited to provide appropriate referral. The Division has worked to increase our presence through these positions focused solely on Pre-ETS and similar services to youth.

Transition-age Youth Survey: Three Most Important Services for Obtaining and Keeping Desired Job

Respondents were provided a list of IDVR services and asked to identify the three most important services they needed to help obtain and keep the job they desired. There was no limit to the number of services respondents could choose. Table VR.7 summarizes the results.

	Number	**Percent of Total**
Help finding a job	156	50.6%
College education	116	37.7%
Transportation	110	35.7%
Help with employment preparation activities e.g. resume, application	103	33.4%
Support on the job like a job coach	102	33.1%
Vocational training	86	27.9%
Affordable housing	53	17.2%
Mental health counseling	35	11.4%
Assistive technology	19	6.2%

Help finding a job, college education, and transportation were the most frequently selected items in response to the question regarding the three most important services needed to obtain and keep a desired job by transition-age survey respondents. When compared to the previous question, note that results are different college education is the top item, help finding a job ranked fourth, and transportation is in the sixth position in the table above.

Transition-age survey respondents were asked an open-ended question regarding any other comments about the services that would help to prepare for, obtain and retain employment. Seventy-nine narrative responses were received. Three comments were positive in regard to IDVR transition services and seventeen were critical of services.

The following recommendations from IDVR's 2019/2020 CSNA related to the needs of youth with disabilities in transition:

1. IDVR is encouraged to continue efforts to identify needs and programs for implementing pre-employment transition services. The agency should consider adding some tiered approaches that will enhance the delivery of pre-employment transition services to students with disabilities that have differing functional capacities. In addition, IDVR is encouraged to develop strategies, either through direct or contracted services, to increase the delivery of pre-employment transition services to all areas of the State.

2. IDVR is encouraged to focus outreach efforts to students and youth with disabilities that are not traditionally known to IDVR through collaboration with special education services. The agency should consider increasing marketing and outreach to mainstream educators, 504 coordinators, school counselors, school nurses, and pediatric medical providers in the community. As outreach results in increased referrals and applications by these populations, IDVR is encouraged to tailor services to meet the diverse needs of these individuals.

3. IDVR is encouraged to increase marketing, communication and expectations directed toward parents and families of youth with disabilities.

4. IDVR should consider assessing the availability of IDVR services and making them more accessible across the state, particularly in the remote areas of high concern for youth.

The Division will continue to increase our efforts to deliver services to students with disabilities in response to WIOA mandates. The Division's proposed activities to address Pre-ETS and youth is detailed in section 'o' of this plan.

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

The 2019/2020 CSNA summarizes results in section 6 of the document "Need to Establish, Develop or Improve Community Rehabilitation Programs in Idaho", the most common themes that emerged in this area were:

The following themes were recurring from the individuals interviewed for this assessment around the need to establish, develop or improve community rehabilitation programs serving individuals with disabilities in Idaho:

1. Overall, IDVR has strong partnerships and access to CRPs in the more populous areas of the state, however provider coverage and range of available services becomes more irregular in the rural and remote areas of Idaho.

2. There were concerns about the quality and quantity of employment outcomes for IDVR consumers that receive CRP services.

3. CRP employment services were generally described as in need of improvement. There are varying perspectives on why employment services provided by CRPs are not as successful as they can be.

4. Pre-employment transition services have created additional opportunities for CRPs. This is seen as a great opportunity for all involved, but the level of quality varies. Some view contracted services versus fee for service as a practice which promotes differing outcomes.

5. Depending on the lens of those interviewed, there are a variety of CRP services needing attention or improvement. These include, but are not limited to:

    a. Improvement in CRP evaluations to include a wider variety of community-based evaluation sites.

    b. Concerns of conflict of interest when CRPs are recommending continued services in their program with no measurement for when success or skill levels will be achieved.

    c. Partners of IDVR are not generally pleased with the outcomes or services provided through CRPs.

    d. There is a need for improved consistency across IDVR regions related to policy, forms and expectations of CRPs.

    e. Participants indicated that CRPs are not clear on their role under WIOA. The learning curve has been challenging for all parties and training/communication to CRPs could improve.

    f. Implementing fading options for IDVR participants was a positive change in services but understanding of the concept and expectations has been challenging. Additional guidance has been requested by CRPs.

    g. Both CRPs and IDVR need training in employment opportunities in today's labor market. Use of LMI and strategies for finding non-traditional types of employment are not possible without additional training and support.

6. Largely, CRPs seem to be confused on the difference between IDVR and Extended Employment Services (EES), a separate state funded program under the Division. This appears to be an area of confusion that needs to be addressed.

    a. CRPs are faced with high turnover and this instability of staff affects the quality of services.

    b. The perception is that low pay of many CRP staff is the major cause of turnover.

    c. The quality of job coaches is highly questionable. Many have little more in the way of credentials than a high school diploma.

    d. There is a need for more effective and standardized quality assurance monitoring and evaluation of CRPs.

    e. CRPs have a questionable capacity to serve individuals with language barriers.

    f. There is a need for increased communication between VR and CRPs to gain clarity on expectations and coordination of services.

    g. CRPs should devote more time in training individuals with disabilities on life skills such as hygiene, budgeting, etc.

There are two primary areas where needs are present to establish, develop, or improve CRPs within the state of Idaho:

1. Meeting the need of emerging/novel requirements of WIOA and expanding the statewide capacity of CRPs to deliver these services with fidelity (e.g., Customized Employment, Pre-ETS and similar services to youth, Youth Extended Services).
2. Monitoring and improving Community Rehabilitation Program performance through a collaborative iterative learning process.

The continuous improvement of CRPs is an ongoing function of IDVR: The establishment, development and improvement of CRPs within the state fall under the purview of IDVR's Planning and Evaluation team. One of P&E's responsibilities within the agency is a comprehensive CRP monitoring process. This process seeks to provide an initial threshold of quality for new CRPs who wish to serve IDVR consumers, provides a maintenance function in retaining a base level quality standard, and a remediation process for CRPs who fall short of standards via a three-year site review process.

3. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

Overview

As previously mentioned earlier in section e, IDVR commissioned a Comprehensive Statewide Needs Assessment (CSNA) beginning late summer of 2019, including an assessment of the rehabilitation needs of youth with disabilities in transition and student need for Pre-Employment Transition Services. Detailed information is provided in section 'e'.

The Idaho Division of Vocational Rehabilitation is an agency of the Idaho State Board of Education and partners with other agencies under the Board through coordination and collaboration.

IDVR has strong relationships with Education agencies throughout the state, including formal interagency agreements with several Local Education Agencies (LEAs), a comprehensive formal interagency agreement which addresses collaborative service provision with the State Department of Education (SDE), and the Idaho Commission for Blind and Visually Impaired (ICBVI).

IDVR, ICBVI, and the SDE have developed a comprehensive formal interagency agreement which addresses collaborative service provision. This agreement specifies the programmatic and fiscal responsibilities for each agency. LEAs provide different transition services to students with disabilities for various reasons, adequate funding being one of the major reasons. Therefore, the Division needs to understand the types of transition services that are currently provided by each LEA to determine what Pre-ETS activities should be considered for students with disabilities at the LEA level.

As a result of that need, IDVR continues coordination activities with educational officials and other state agencies to provide an annual Transition Institute last held in fall of 2021. The fifth annual Transition Institute is scheduled for fall 2022.

Districts will bring teams, that will include a VR Counselor to the Institute to develop specific goal directed plans based on district data to improve Pre-ETS and transition focused education based on district need. This will provide IDVR with the specific criteria to determine which agency (IDVR or LEA) has primary responsibility for providing and paying for transition related services for students with disabilities as well as what additional Pre-ETS should be targeted to each LEA.

Lastly, IDVR has partnered with the SDE to implement a Statewide Secondary Transition Plan which correlates to the Division's Pre-Employment Transition Plan. The goal on the statewide plan is to develop systems for effective collaboration between students, families secondary and post-secondary educators, rehabilitation counselors, and service providers to evaluate the quality and quantity of transition activities and pre-employment transition services.

K. ANNUAL ESTIMATES

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

This estimate includes the number of the individuals in Idaho who experience disabilities, ages 16 and over who are in the labor force according to the American Community Survey 5-Year Estimates (Table S1811, 2015, 2016, 2017, 2018, and 2019). The latest currently available census data shows 213,955 Idahoans with disabilities age 16 and over with 69.4 percent of individuals not in the labor force, yielding an estimate of 65,470 Idahoans with disabilities participating in the labor market. Forecasting suggests there will be 67,942 eligible Idahoans in FFY 2022 and 70,624 FFY 2023. These numbers reflect a slight reduction in the overall labor force participation rate of Idahoans with Disabilities from 2018 and 2019 ACS 1-year estimates.

Year	Census Estimate	Forecast Population	Lower Bound (95%)	Upper Bound (95%)
ACS 2017	59921			
ACS 2018	61526			
ACS 2019	65470	65470		
FFY 2022		67942	66592	69292
FFY 2023		70624	69247	72000
FFY 2024		73305	71871	74739

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

A. THE VR PROGRAM;

The number of customers served by IDVR under WIOA has diminished. Historic rates of low unemployment across Idaho, new mandates created by WIOA, and COVID-19 are likely factors in this downturn. The Division has launched an outreach strategy to re-engage former customers, and Idaho's unemployment rate has returned to near pre-pandemic levels with a November 2021 preliminary rate of 2.6 percent (BLS.gov). While it can be difficult to accurately predict customer application rate in the unique conditions presented by the current labor market, the Division believes the downward trend in applications and plans will end and we can expect an unknown increase in applications for VR services. IDVR's fiscal unit conducts forecasts using increases of one, three and five percent service volume increases to project various cost scenarios and their potential impact on grant funds. For the purposes of this section (K.2-K.4), the Division will utilize the three percent volume of services increase for FY 2022 and the five percent volume of services increase for FY 2023. Due to uncertainty surrounding inflationary pressure, the Division has used FY 2021 one-year actual costs rather than the alternate five-year average cost model to better approximate higher anticipated costs.

IDVR has 5073 participants in plan and receiving services in the most recently completed fiscal projection model. This includes 2010 participants under Most Significant Disability (MSD), 1675 participants under Significant Disability (SD), and 1388 participants classified under the Disability (D) severity categories.

Estimates of Customers in Plan Status (Receiving Services) for IDVR

	MSD	SD	D	Total in Plan
FFY 2021 Actual (100%)	2010	1675	1388	5073
FFY 2022 Estimate (103%)	2070	1725	1430	5225
FFY 2023 Estimate (105%)	2111	1759	1457	5327

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

As noted in the prior section, the Division believes the downward trend in applications and plans will end and we can expect an increase in applications for VR services. This expectation extends to the SE program. IDVR's fiscal unit conducts forecasts using increases of one, three and five percent to project various cost scenarios and their potential impact on grant funds. For the purposes of this section (K.2-K.4), the Division will utilize the three percent volume of services increase for FY 2022 and the five percent volume of services increase for FY 2023.

	SE Participants in Plan	Total Annual Cost	Anticipated Title VI Funds	SE Title I Funds
Current (100%)	459	$762,187	$300,000	$462,187
FFY 2022 (103%)	473	$785,052	$300,000	$485,052
FFY 2023 (105%)	482	$800,296	$300,000	$500,296

The Division expects to receive $300,000 in Title VI Supported Employment funds for PYs 2022 and 2023. As projected expenditures exceed Title VI funds, The Division will supplement Title VI SE services utilizing Title I VR funds. The Division does not anticipate any issues expending the $150,000 set aside for SE services, and Extended Services to students and youth.

Note: This section includes estimates for SE qualifying services only (i.e., job coaching). Supportive services, or services beginning prior to job placement are not included in this section.

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

IDVR is not operating under an Order of Selection. IDVR will continue to monitor fiscal conditions as impacted by WIOA to determine whether or not an Order should be established and/or implemented. IDVR currently operates three-tier significance of disability scale in line with Federal D, SD, and MSD reporting guidelines.

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

N/A

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

As noted in K.1 and K.2, the Division believes we can expect an increase in applications for VR services. IDVR's fiscal unit conducts forecasts using increases of one, three and five percent to project various cost scenarios and their potential impact on grant funds. For the purposes of this section (K.2-K.4), the Division will utilize an FFY 2021 actual basis, the three percent volume of services increase for FY 2022, and the five percent volume of services increase for FY 2023 for projections.

IDVR's fiscal unit conducts projections annually down to severity category. While IDVR is not operating under an Order of Selection, this exercise better prepares the Division to detail projections at the category level should it become necessary. Additionally, IDVR's fiscal unit conducts fiscal projections using two models. One is a scenario using the five-year average cost per customer, and the second is a scenario using current YTD average costs per customer.

Due to uncertainty in projections due to conditions presented by COVID-19 including excessive inflationary pressures which may or may not be transitory, IDVR has selected the current year average costs for projections in this state plan to reflect higher anticipated costs in the coming two-years. As additional time elapses under the current SE provision model, and conditions normalize, the Division will consider switching these estimates to the five-year projections. For the purposes of this plan the division believes the YTD projections represent the best model to project expenditures under current conditions.

	MSD	SD	D	Total
Estimated in Plan Status	2010	1675	1388	5073
Estimated Cost per Plan	$1,644.36	$1,546.44	$1,374.36	$1,538.16
Estimated Customers on SE Plan	459	N/A	N/A	
Average SE Services Cost	$1,660.54			
Estimated SE Annual Expenditure	$762,186.60			$762,186.60
Non-SE Plan Expenditure	$2,542,977.00	$2,590,287.00	$1,907,611.68	$7,040,875.68
Total Estimated Annual Plan Cost	$3,305,163.60	$2,590,287.00	$1,907,611.68	$7,803,062.28

	MSD	SD	D	Total
Estimated in Plan Status	2070	1725	1430	5225
Estimated Cost	$1,644.36	$1,546.44	$1,374.36	$1,538.16

	MSD	SD	D	Total
per Plan				
Estimated Customers on SE Plan	473	N/A	N/A	
Average SE Services Cost	$1,660.54			
Estimated SE Annual Expenditure	$785,052.08			$785,052.08
Non-SE Plan Expenditure	$2,618,773.12	$2,667,609.00	$1,965,334.80	$7,251,716.92
Total Estimated Annual Plan Cost	$3,403,825.20	$2,667,609.00	$1,965,334.80	$8,036,769.00

	MSD	SD	D	Total
Estimated in Plan Status	2111	1759	1457	5327
Estimated Cost per Plan	$1,644.36	$1,546.44	$1,374.36	$1,538.16
Estimated Customers on SE Plan	482	N/A	N/A	
Average SE Services Cost	$1,660.54			
Estimated SE Annual Expenditure	$800,295.81			$800,295.81
Non-SE Plan Expenditure	$2,670,948.15	$2,720,187.96	$2,002,442.52	$7,393,578.63
Total Estimated Annual Plan Cost	$3,471,243.96	$2,720,187.96	$2,002,442.52	$8,193,874.44

Note: IDVR is not on an order of selection, however, the Division prepares projections utilizing severity categories to conduct more accurate fiscal forecasting in the event OoS implementation was indicated.

L. STATE GOALS AND PRIORITIES

1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED AND AGREED TO BY THE STATE VR AGENCY AND THE STATE REHABILITATION COUNCIL, IF THE STATE HAS A COUNCIL, AND JOINTLY AGREED TO ANY REVISIONS

IDVR and the State Rehabilitation Council (SRC) revised/modified the goals and priorities based on the recently completed Comprehensive Statewide Needs Assessment (CSNA). New program

goals and priorities reflect and align with program changes resulting from WIOA, the results from the latest CSNA, and the goals and strategies of the combined state plan.

IDVR, in collaboration with the SRC, will continue to develop specific strategies that are in alignment with these goals and priorities.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS

The goals and priorities for the Division are reviewed annually and revised as necessary based on input from a variety of sources including the SRC, combined plan partners, the State Independent Living Council (SILC), the Client Advocacy Program (CAP), Tribal VR representatives, findings and recommendations from monitoring activities conducted under Section 107, and the IDVR management team, including management at the regional level. Additionally, the goals and priorities are informed by the Comprehensive Statewide Needs Assessment (CSNA) which is conducted every three years.

The Division evaluates progress multiple times a year during Idaho's Strategic Plan development cycle and Idaho's Performance Measurement report. These occur approximately every six months and the Performance Measurement report is dependent upon the goals and measures established in the Strategic Plan. The State of Idaho limits the number of measures contained in the performance evaluation report to a subset of the strategic plan elements to better focus reports on those data which are impactful to the program. The State Board of Education and the Division of Financial Management oversee these requirements and include explicit benchmark criteria be established for performance expectations. The most current approved Strategic Plan and Performance Measurement Report document are available on IDVR's website: https://vr.idaho.gov/publications/. IDVR includes RSA's Primary Performance Indicators as core performance measures in our annual strategic plan and reporting cycle. In general, the agency seeks to maintain or improve performance across these indicators, unless a specific target has been negotiated with RSA.

Goal 1 - Provide quality, relevant, individualized vocational rehabilitation services to individuals with disabilities to maximize their career potential

- Priority 1 - Expand, monitor, and improve pre-employment transition services (Pre-ETS) to students with disabilities and similar services to youth.
- Priority 2 - Provide a comprehensive array of services to individuals with disabilities, including individuals with Most Significant Disabilities (MSD).
- Priority 3 - Hire and retain qualified staff to deliver quality vocational rehabilitation services.
- Priority 4 - Improve access to quality Career Pathways tools to inform customer career choice. Improve appropriate utilization of Labor Market Information in concert with these tools.
- Priority 5 - Improve overall quality of CRP services.

Goal 2 - Improve VR program efficiency through continuous quality improvement activities

- Priority 1 - Meet or exceed negotiated targets on Primary Performance Indicators 1-5 established by the US Department of Education, Rehabilitation Services Administration.
- Priority 2 – Continue to monitor IDVR's Customer Satisfaction Survey in collaboration with the State Rehabilitation Council and work together on strategies to increase the overall satisfaction rate.

- Priority 3 - Maximize the utilization and documentation of comparable benefits.
- Priority 4 – Continue efforts to align IDVR activities with the workforce development system.
- Priority 5 - Evaluate IDVR assessment utilization.
- Priority 6 – Continue to monitor and adapt the internal control system of the agency to strengthen program compliance and improve program outcomes.

Goal 3 – Improve outreach and services to IDVR business customers

- Priority 1 – Increase business utilization of IDVR expertise and services.
- Priority 2 – Evaluate and realign agency structure to meet the needs of business customers.

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

IDVR published its last completed a CSNA in April 2020 which includes an assessment of Pre-ETS and youth need as well as considering the needs of business.

The Division's goals and priorities reflect those areas where the Division plans to focus efforts for improvement and are directly informed by the CSNA. The Division worked closely with Idaho's State Rehabilitation Council using the results of the latest Comprehensive Statewide Needs Assessment and have updated these goals and priorities with language that meets the direction provided by the SRC.

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

Title IV Vocational Rehabilitation programs are required to set estimated levels of performance for all primary performance indicators under this Combined State Plan with the exception of the Employer Satisfaction indicator. RSA-TAC-20-02 provides guidance on setting expected levels of performance for these indicators. While preliminary data now exists for all required indicators per TAC-20-02, historical data for many of these elements must still be collected before accurate forecasting can occur. IDVR anticipates being able to employ forecasting for projections across all indicators in the next plan, and anticipates the subsequent two-year revision will provide far more reliable estimates:

- Employment in the 2nd quarter
- Employment in the 4th quarter
- Median earnings
- Credential attainment
- Measurable skill gains
- Effectiveness in serving employers.

Reliability and Validity Activities:

The Division has an established data sharing agreement, providing access to in-state wage data along with the State Wage Interchange System (SWIS) data as a non-access PACIA. IDVR has access to Idaho's Statewide Longitudinal Data System and is utilizing some elements where

timely imputation is possible. The Division is working closely with other core WIOA partners on a Workforce Development Quality Initiative (WDQI) grant which seeks to remove barriers through automation and reduce the time required to access this data. Work continues on the WDQI initiative, and additionally the Division has dedicated staff to the DataLabs project alongside other core WIOA programs in Idaho which further seeks to advance co-enrollment.

The Division continues to improve our data validation and accuracy efforts by:

- Systematic utilization of RSA provided tools (Quarterly Dashboards/Other Measures that Matter/RehabData Workgroup products) to validate data and identify errors and areas for improvement.
- Dialogue with our case management system vendor, and affiliated community of practice for technical assistance, adaptation, and improvement of the system under WIOA
- Regularly conducted data validation activities, working with the field to resolve identified errors and advancing strategies which provide strong automatic internal control where possible

The Division's Information and Communication strategy promotes continuous improvement by informing staff each quarter of errors and anomalies detected by this strategy and working with staff to fix errors and fix or certify anomalies. The expectation is that errors and anomalies for staff working through these corrections will diminish over time, and annual case file reviews and quarterly data anomaly checks indicate this is occurring: overall IDVR has experienced reduced errors and increased compliance across elements gauged by these activities

The Division will continue to collect and analyze data to inform expected levels of performance to use for future negotiations with RSA. Currently, projecting performance improvements accurately can be difficult due to lack of historical data surrounding some of these indicators. Dissemination and utilization of 116 primary performance data is reinforced at IDVR through various activities including quarterly reviews of PPIs and Other Measures by executive leadership, and changes to agency priorities, goals, and objectives are driven, in part, through an understanding of Division performance across these items. Goal 2, Priority 1 specifically addresses continuous quality improvement as gauged by section 116 primary performance indicators.

Emerging national data from CSAVR on these elements (PY 2020) suggest Idaho Title IV programs are performing well as a whole. (RSA, 2021):

- Employment in the 2nd quarter: 59.9 percent, 1st quartile (4th overall of 52)
- Employment in the 4th quarter: 57.3 percent, 1st quartile (4th overall)
- Median earnings: $4,259, 2nd quartile performance well outpaces Idaho's expected median earning performance as a historically 4th quartile median wage state for overall wages.
- Credential attainment: 40.3 percent, 1st quartile performance, (7th overall)
- Measurable skill gains: 52.6 percent, 2nd quartile performance, (15th overall)

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

The Division has worked closely with RSA on their data dashboard information and utilizes the dashboard to identify and fix inaccuracies in the data collection process and for performance improvement.

IDVR's last 107 monitoring was conducted in 2021, and the Division received a final report on March 7, 2022. Consequently this report was received after the State Goals and Priorities were developed for this iteration of the plan. However IDVR did benefit from numerous preliminary recommendations and informal discussions during the course of the review which did inform immediate action. The Division has already committed to action across several of these recommendations and has developed initial responses on two findings contained in the draft report.

The Division's finding on residency duration language has been addressed within policy and training has occurred. The Division agreed with both findings and is in the process of developing a corrective action plan for the second finding on deficiencies in the contract monitoring process. IDVR will formally respond to RSA with corrective action within the 45 days required by the monitoring report.

M. ORDER OF SELECTION

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES

IDVR is not currently in order of selection.

B. THE JUSTIFICATION FOR THE ORDER

IDVR is not currently in order of selection.

C. THE SERVICE AND OUTCOME GOALS

IDVR is not currently in order of selection.

D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER; AND

IDVR is not currently in order of selection.

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

IDVR is not currently in order of selection.

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT

IDVR is not currently in order of selection.

N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS

1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

IDVR received $300,000 in Title VI, Part B funds in FFY 2022. These funds are made available for all Supported Employment cases statewide. IDVR focused Title VI, Part B funds on direct case service provision for job coaching exclusively, including $150,000 for SE youth. The

Division has established a process to provide Youth Extended Services using Title I funds after exhausting Title VI funds.

The Division anticipates that adult SE funds and youth SE funds will be exhausted annually, and the Division will continue to provide these services under general Title I funds.

Since this population is by definition MSD, they would also continue to receive services, even in the event that IDVR implemented an Order of Selection, unless Order was expanded to temporarily suspend services to part or all of the MSD population. No existing fiscal projection would indicate this action.

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

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

IDVR reserves 50 percent of Title VI Part B funds for the provision of Supported Employment and Extended Services to youth. IDVR's expenditures on SE services far outstrips the funds allocated under Title VI Part B. The Division does not anticipate any problems expending these funds as authorized.

The Division has developed policies to ensure that Youth Extended Services (YES) can be provided up to four years as needed for individuals under the age of 25 following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. The Division will continue to support YES with Title VI or Title I funds, as required by WIOA, and will continue to leverage other sources of extended services. Youth Extended Services are only for individuals who are MSD and have completed SE services.

B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

IDVR utilizes the State's Extended Employment Services program as well as the Medicaid Home and Community-Based Services (HCBS), and Aged and Disabled (A&D) waivers for long term support. The Division will continue to work closely with each program overseeing these resources to streamline our referral process and improve utilization of this external source of extended services funding.

O. STATE'S STRATEGIES

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES

The Division's Statewide Assessment (j) outlines an array of potential priorities to expand and improve services to Idahoans with disabilities. Initial innovation and expansion activities under WIOA were focused primarily on establishing new and modified services to conform with the requirements of the regulations. While the Division will continue to expand these services in some areas, there will be an increasing focus on raising the quality of services to customers under all priorities listed under Goal 1 in section (l) of this plan.

IDVR will continue to maintain the two ongoing primary innovation activities, supporting the activities of both the State Rehabilitation Council (SRC) and the State Independent Living Council (SILC). The SRC serves as IDVR's advisory council and together with the Division and the CSNA inform the goals, priorities, and strategies for agency.

Additionally, IDVR in PYs 2022-2023 will continue limited pilot projects under Pre-ETS while continuing to monitor and refine those programs now being offered at a statewide level. More detail on plans for improving services to students and youth can be found under part four of this section.

The Division had committed to a sustained campaign to improve frontline services to individuals with disabilities offered by Idaho's Community Rehabilitation Providers in the 2020 state plan update. Unfortunately, these efforts were placed on hold as the agency pivoted to adapt to the COVID-19 pandemic. However, the Division has reclassified an FTE and hired a dedicated Community Rehabilitation Program Manager to lead these improvements.

Following the creation of new policy on Supported Employment (SE) under WIOA to address regulatory changes pertinent to SE and an initial wave of internal staff training, the Division conducted multiple activities to collect input on services to individuals with MSD.

Expansion of service delivery options remains an expressed need in more rural and remote areas of Idaho, while indicated improvements were for traditional CRP and Pre-ETS services remains an agency priority, including a need for more relevant community-based assessment options, stronger local area collaboration between IDVR and providers, and timeliness to CRP service initiation. More detail on the CRP improvement strategy can be found under part five of this section "plans for establishing, developing, or improving community rehabilitation programs within the State."

2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS

IDVR is committed to expanding the availability and provision of Assistive Technology. The Division has an ongoing partnership with the Idaho Assistive Technology Project (IATP) housed at the Center on Disabilities and Human Development at the University of Idaho. Through this partnership IATP provides continuing education and technical assistance to IDVR personnel via face to face and distance methods. An IDVR staff member maintains representation on IATP's Advisory Council.

The Division has an agreement as of November 2020, with the Idaho State Department of Education (SDE) outlining shared responsibilities and implementing a program which:

1. The parties anticipate that LEAs will purchase any assistive technology/equipment determined through the IEP process to be necessary for the education program of individual students who are enrolled in the district.

2. VR will purchase any assistive technology/equipment determined through the IPE process to be necessary to access Pre-Employment Transition Services or VR employment outcome.

Additional AT resources for staff training include the Idaho Training Clearinghouse, which hosts multiple resources and is funded by SDE's Special Education Division.

IDVR has provided counselors who serve deaf and hard of hearing customers with the AT needed to enhance communication.

3. THE OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS WELL AS THOSE WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM

IDVR has exceeded a ratio of minority service rate to non-minority service rate of 1.00 for a program year the first time under WIOA achieving a rate of 1.006 for PY 2020. Current data for PY 2021 show a slight regression to .974 as of December 2021. Significant gains in service outreach, an emphasis on accurate coding of race and ethnicity status, and Pre-ETS expansion and outreach are all potential contributors to this trend.

IDVR's Administrator has championed outreach as a priority moving into 2022. By early January 2022, all Regional Managers will have developed a region-specific outreach strategy.

The identification and service estimates for minority populations in Idaho are derived from population estimates and internal agency data on customers.

The Hispanic population is Idaho's largest minority group at 12.8 percent, and 11 percent of all Idahoans identified as having Mexican origin with 1.8 percent for all remaining Hispanic origin subcategories. (2019 ACS Demographic and Housing 1-Year Estimate). Internal agency data suggests this population remains underserved representing 8.41 percent of total applications in PY 2019 and 8.76 percent in PY 2020. The Division is aware of the sustained gap in both applications and plans for this population and has included an initiative in this plan to explore/expand Spanish language options for customers across Idaho. COVID-19 has placed this initiative on temporary hold, but the Division continues to plan for this expansion. As noted in section j, Idaho's Hispanic population is significantly younger, and the agency should expect a significant increase service rates as the bulk of this population enters working age.

Further analysis of outreach and service delivery by race may confounded due to low populations in remaining categories, however the following table presets data for Race alone or in combination with one or more other races from latest available ACS Demographic and Housing Estimates (DP05) which best aligns with IDVRs internally available data:

	ACS 2019	PY 2019	PY 2020
White	92.5%	95.46%	95.50%
Black or African American	1.2%	2.23%	2.41%
American Indian and Alaska Native	2.4%	3.95%	3.30%
Asian	2.5%	1.08%	1.33%
Native Hawaiian and Other Pacific Islander	0.4%	0.56%	0.68%
Some other race	4.5%	--	--

Idaho's demographics are changing, and Idaho was the second fastest growing state relative to population in the past 10 years, with the population growing over 17 percent in the decade (US Census Bureau, 2020). Idaho was the fastest growing state by percentage in the last year, growing 2.9 percent and was ninth in total numeric growth at 53,151. While Idaho is traditionally a major state for resettlement in Regions 3, 4, 7 and 8, net international migration has slowed significantly under the COVID-19 pandemic (with the primary driver of Idaho's recent population increase coming from net domestic migration). Regardless of unique present factors, IDVR remains committed to refugee outreach efforts: In order to best understand the needs of this population, IDVR conducts joint staff training in conjunction with the Agency for New Americans. IDVR works maintains regular contact and outreach with staff at the International Rescue Committee refugee organization and all three resettlement agencies in the Treasure Valley and Magic Valley regions. The Division maintains contact with Family Medicine, a medical provider to newly arrived refugees in the in these regions to coordinate referrals.

Additionally, IDVR conducts ongoing outreach activities to meet the needs of the Spanish speaking population statewide. A number of these individuals engage in migrant seasonal farm work. The Division works collaboratively with IDOL, the Community Council of Idaho (a rural-centered, nonprofit serving Latinos in Idaho, and the Idaho Division of Hispanic Affairs to identify these individuals and processes to best conduct outreach activities.

The Division has launched its I&E priority on CRP quality improvement and rate re-evaluation. A new CRP manager has been hired and is currently in the process of project planning prior to engaging partners in preliminary efforts, including but not limited to rate re-evaluation, quality outcome payments, ACRE certification, heightened and clarified expectations, and an updated evaluation and monitoring strategy for CRPs.

IDVR is furthering Hispanic outreach efforts through increased involvement with LEAs and in rural areas across Idaho: These two strategies address the substantial concentrations of both Hispanic youth and Idaho's Hispanic population to best leverage outreach opportunities:

LEAs:

Hispanic students made up 18% of K-12 enrollment in 2019-2020 but accounted for 31% of enrollment growth in the previous five years. From 2014-2015 to 2019-2020, Hispanic enrollment increased 12%, and non-Hispanic enrollment increased 5%. -The Hispanic Profile Data Book for Idaho 5th Ed. (2021).

Rural Communities: the I-84/I-86/I-15 Interstate Highway Corridors:

Hispanics are heavily concentrated in the southern part of the state but live in all 44 counties. As of 2019, 90% lived south of a line from Payette County in the west to Bonneville County in the east. Half live in just three counties: Canyon, Ada, and Bonneville. -The Hispanic Profile Data Book for Idaho 5th Ed. (2021).

Idaho Department of Labor has an existing Hispanic outreach program which conducts targeted outreach to these communities with heavy concentration of Hispanic and migrant seasonal farm worker population. IDVR plans to better understand the existing outreach efforts under IDOL and will explore opportunities for collaboration or adaptation/modification of this approach where indicated.

The Division conducts various outreach activities to identify and involve individuals with disabilities from underserved backgrounds. These include but are not limited to:

- Monthly participation in the Amigo Round Table hosted by the Mexican Consulate
- Working with community based mental health programs to identify leads for potential outreach
- Continuing meetings with Boise State University's Hispanic equivalency recruiter
- Meeting with the Idaho Department of Health and Welfare's bilingual staff as well as ongoing meetings with DHW's Targeted Service Coordinators to identify potential referrals
- Participation in the multi-partner Refugee Employment Networking and Training group hosted by the Idaho Department of Labor
- Collaboration with the College of Southern Idaho Refugee Center for referral for refugees with disabilities needing VR services

IDVR also conducts tribal outreach, per agreement, in conjunction with 121 projects to the four tribes located in Idaho and the substantial American Indian population residing in the Treasure Valley.

IDVR has a representative on the Sho-Ban Job Fair and Hiring Event committee in partnership with Shoshone-Bannock VR, IDOL, tribal leadership and employers which connects prospective employees to employers.

IDVR has connected with the ESL coordinator at the College of Western Idaho who disseminates information to VR staff on free English language classes and training opportunities for customers.

IDVR regularly engages with qualified interpreters for a variety of languages to better serve VR clients with limited English proficiency.

Idaho currently has seven Community Rehabilitation Programs who hold 14(c) special wage certificates (down from eight last plan). Four are currently active with three listed as pending renewal by US DOL W&H as of December 2021. IDVR has developed a Career Counseling and Information & Referral process which is delivered multiple times per year at each certificate holder sites. To meet regulatory requirements of the Division under 397, IDVR encourages individuals as a part of ongoing Career Counseling and Information & Referral, to engage with the Division if interested in pursuing Competitive Integrated Employment as a part of their informed choice. The Division anticipates the decline in 14(c) subminimum program utilization will continue over time.

4. THE METHODS TO BE USED TO IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POSTSECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES)

The expansion, provision, and evaluation of various Pre-ETS activities are ongoing. Continued collaboration with the SDE and LEAs alongside feedback from customers and parents/guardians when applicable are instrumental in better understanding which services should be continued, modified, or ended. Activities like the Transition Institute will bring these stakeholders together and allow for the collection of rich qualitative data to further inform improvements to these services.

The Transition Coordinator will also use the district plans that are created at the Institute to identify specific transition service needs of each district. This will allow VR to target districts who need intensive levels of support as priority districts. VR will also continue to provide targeted and universal support to districts who have identified lower levels of need.

IDVR has evaluated our effectiveness in our internal VR structure and Pre-ETS performance and have subsequently identified additional strategies to implement to positively impact the number of students receiving Pre-ETS services as well as the number of services delivered. IDVR believes that the following strategies will also increase our effectiveness in coordinating with school districts for the purpose of positive student outcomes.

IDVR implemented new Area Transition Counselors. IDVR divided the state into three areas for these positions to serve. The positions serve both students directly as well as coordinate with school districts and VR staff. After this first year of having the Area Transition Counselors in place, IDVR has further determined that there is a need for additional restructuring to better serve the students of Idaho. IDVR is creating new Pre-ETS Counselor roles to serve each regional area of Idaho. This new caseload structure will provide a focus for staff to work more closely with the Area Transition Counselors and the Statewide Transition Coordinator to implement and deliver quality services for their local community schools in a more effective manner.

Toward these ends, expected outcomes include an increase in student participation in Pre-ETS, an increase in the number of students participating in Pre-ETS based on student need, an increase in the number of students achieving his or her employment outcome following engagement with IDVR.

IDVR is evaluating the following services and partnerships

- Post-secondary partnerships
- Summer paid work experience
- Local Education Agency partnerships
- Idaho Educational Services for the Deaf and Blind partnership
- Idaho Parent Unlimited partnership

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE

The Division is committed to engaging in innovation and expansion activities designed to establish, develop and/or improve Community Rehabilitation Programs (CRPs) across Idaho. Based on sustained demonstrated need highlighted in the past two Comprehensive Statewide Needs Assessments and aligned with the joint goals of IDVR's administration and IDVR's State Rehabilitation Council the Division is currently exploring a number of potential initiatives to promote quality CRP outcomes including but not limited to:

- Promoting the Professionalization of CRP Staff:
    - An exploration of established training models used by CRPs/other DSUs to promote initial competence when providing services to people with disabilities
    - An exploration of continuing education requirements used by CRPs/other DSUs to promote career-long learning and quality outcomes
    - Formalization of initial and on-going education requirements for providers who want to serve IDVR customers
- Reconciling IDVR's CRP Fee Schedule for WIOA Expectations:
    - Evaluation of rates for services to include an assessment of potential new competency and training requirements
    - Formalizing new rates for services based on enhanced education and competency requirements
    - Expanding options for outcome-based results/quality outcomes for IDVR's customers who use CRPs.
- Clarifying Expectations/Information and Communication:
    - Establishment of new requirements and guidance around IDVR expectations for individualized service provision, documentation, and more tailored/personalized community-based evaluations.
    - Explore a potential streamlining of requirements to serve rural and remote communities, allowing more potential providers with a lower barrier to entry in underserved/unserved areas.
    - Due to persistent confusion in the CSNA: Work with Extended Employment Services to help CRPs, customers, and parents/guardians understand Competitive Integrated Employment requirements of IDVR and how the programs intersect.
- Strengthen the Feedback Loop with CRPs:
    - Work with partners to clarify agency expectations and requirements through continued development of the CRP Manual.

- Overhaul IDVR's CRP Monitoring Protocol to align with the requirements of WIOA and increase relevance to frontline staff and CRPs
- Continue to engage with CRP partners to address ongoing and emerging issues
- Explore performance accountability options following implementation of heightened requirements
- Provide a single point of contact and sufficient energy to CRP improvements through the new CRP Manager position.

- Targeted Evaluation of CRP Services for Effectiveness:
  - Work to understand quality of assessments conducted by CRPs
  - Evaluate quality of assessment sites (where applicable) to the individualized personal/vocational needs of customer
  - Evaluate documentation of fading and stability

To further develop positive working relationships with Community Rehabilitation Providers (CRPs) and to enhance service delivery for customers, IDVR participates in CRP association meetings or hosts alternate meetings when necessary. IDVR's dedication of an FTE to a CRP Manager will also help expand communication quantity and quality with these critical partners, helping in part to address the needs identified in the CSNA and CSS results.

IDVR is engaged in a structured program evaluation strategy to maintain and improve the quality of services provided to customers through community rehabilitation providers statewide.

IDVR generates annual CRP employment reports for each vendor who provided services in the past fiscal year. The tool provides information to customers in order to enhance informed choice while they are selecting a CRP. These reports contain aggregated data gathered from our case management system. Information provided includes number of cases served, employment outcomes, average hourly wage of consumers who exit the program successfully, average hours worked per week per consumer, average annual earnings per consumer, employer sponsored benefit rate of those successful closures, the top five occupational outcome categories, and the primary impairments of those served. Counselors provide this information in a manner the consumer can understand to help promote informed choice.

As a function of its consumer satisfaction survey, IDVR collects information on the satisfaction of consumers who received services from CRPs through an enhanced section of the instrument. The Division continues to explore options to improve this instrument.

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA

IDVR is able to provide expected levels of performance for all primary performance indicators under this Combined State Plan.

IDVR currently has strong relative performance falling in the first or second quartiles across all 116 performance accountability measures. Idaho is experiencing record growth and one of the lowest unemployment rates in the nation heading into 2022. The Division is engaging with partners in a number of ways to improve state performance:

The Department of Labor is a recipient of a Workforce Data Quality Initiative (WDQI) grant and continues working with IDVR and other core programs to develop policy and methods to automate data sharing to help all programs for performance reporting purposes. Additionally, the Division is participating in the DataLabs technical assistance project with the Idaho WDC

and representation from WIOA programs. This project is exploring methods to improve appropriate referral and indicate meaningful co-enrollment opportunities between programs.

IDVR has an agreement to access Idaho's Statewide Longitudinal Data System (SLDS) in order to pull education related data elements. The Division is now able to impute limited SLDS data, however receiving data in time to meet reporting requirements continues to prohibit greater utilization of the SLDS system.

The Division has used the RSA Data Dashboards, RehabData Work Group data and data published by RSA as tools to better understand and improve performance under Section 116.

Idaho Title-IV Expected Levels of Performance PY 2022 and PY 2023

RSA-TAC-20-02 notes: there are many ways to define continuous improvement as related to state or national program circumstances. For example, continuous improvement may reflect:

- an increase from the levels of performance previously attained;
- increases in percentile rankings of levels of performance either nationally or among similar states;
- a change in service strategy and delivery, including more progressive or innovative approaches;
- a change in the intensity or comprehensiveness with which customers are served; or
- a maintenance of previous performance for the top performing states.

Idaho Title IV programs are exploring various data-driven processes to utilize for establishing expected levels of performance prior to negotiation with RSA.

Two years ago, the Idaho Title-IV programs employed a data-driven comparative benchmarking exercise utilizing current data published by the RehabData Workgroup to establish expected levels for the last state plan update. As new RehabData products have not yet been issued to replicate the benchmarking exercise, Title IV programs are exploring other data-driven approaches to target setting. The CDC's National Center for Health Statistics has "developed statistical methods and analytical tools to assist in setting transparent, data-driven targets" (NCHS, 2020, p. 1).

Target-Setting Methods in Healthy People 2030 outlines the following approaches in setting data-driven targets:

- Percent improvement
- Percentage point improvement
- Projection
- Minimal statistical significance
- Maintain consistency with national programs, regulations, policies, or laws
- Maintain the baseline

While developed to promote stronger target setting for the Healthy People project, this systematic approach to target setting provides a framework for Idaho to set data-driven targets for all primary performance indicators. Target-Setting Methods in Healthy People 2030 document presents the decision tree for target setting from this project.

Additionally, some recent comparative information on states is available via the November 2021 CSAVR presentation by RSA. Idaho Title-IV programs include this comparative data to

characterize relative performance when establishing expected levels of performance to meet continuous improvement expectations defined by RSA.

Projections are based on the performance data for PY 2020 Idaho Title IV programs from the ETA-9169.

Rationale for Expected Targets for Idaho Title-IV Programs:

Employment Rate-2nd Quarter after Exit

- TAC-20-02 notes a maintenance of previous performance for the top performing states is an acceptable target.
    - Idaho ranks 4th Nationally/1st Quartile (RSA, 2021)
- HP2030 notes that the target-setting method of maintaining the baseline is used when an objective is already at a desired level nationally or because the objective is moving or expected to move in an undesirable direction.
    - Idaho unemployment is at a historic low

Idaho proposes a baseline performance extension for employment rate 2nd quarter after exit. PY 2020 data from RSA's CSAVR presentation show Idaho is 4th in the nation in both 2nd quarter after exit (58.9 percent). December 2021 preliminary unemployment figures show Idaho with the 4th lowest unemployment rate at 2.4 percent (BLS.gov, 2022). This is a series low unemployment rate for Idaho and the series began in 1976. Because of these conditions, Idaho believes maintaining performance across 2nd and 4th quarters is a reasonable expectation.

Employment Rate-4th Quarter after Exit

- TAC-20-02 notes a maintenance of previous performance for the top performing states is an acceptable target.
    - Idaho ranks 4th Nationally/1st Quartile (RSA, 2021)
- HP2030 notes that the target-setting method of maintaining the baseline is used when an objective is already at a desired level nationally or because the objective is moving or expected to move in an undesirable direction.
    - Idaho unemployment is at a historic low

Idaho proposes a baseline performance extension for employment rate 4th quarter after exit. PY 2020 data from RSA's CSAVR presentation show Idaho is 4th in the nation in 4th quarter after exit (57.3 percent). December 2021 preliminary unemployment figures show Idaho with the 4th lowest unemployment rate at 2.4 percent (BLS.gov, 2022). This is a series low unemployment rate for Idaho and the series began in 1976. Because of these conditions, Idaho believes maintaining performance across 2nd and 4th quarters is a reasonable expectation.

Median Earnings-2nd Quarter after Exit

Median earnings have been benefiting from low unemployment in Idaho and the state can expect to see this trend continue in the near term as employers compete for talent. Idaho has seen some vacillation in median wage values across quarters now available for analysis. Data available is not yet suitable for projections however with confidence intervals ranging between ±11.1-13.2%. Idaho comparative performance in Median Earnings suggests an outperformance at $4,259, placing the state in the second quartile (RSA, 2021). Idaho is traditionally a 4th quartile median earnings state, although continues moving in the right direction. Regardless of this outperformance, Idaho Title IV programs are proposing expected earnings increase of 2.5 percent a year following the TSM percent improvement method.

Credential Attainment

Idaho performance was in the first quartile and 7th overall for PY 2020 (RSA, 2021). Regardless of this performance, the Idaho Title IV programs are committing to significant improvement targets within this two-year update.

Idaho has recently corrected reporting issues with accurately reporting Credential Attainment and consequently has realized a substantial gain as reporting has come online. Since accurate trend data for this measure is unavailable, Idaho is utilizing the TSM percentage point improvement method. This method articulates 10-year goal setting for both target effect sizes of 0.1 and 0.2 to correspond with 10 percent and 20 percent improvement, respectively. The benefit of using this approach is that it is sensitive to projections closer to the top or bottom of the spectrum.

The NCHS Statistical Note on Target-Setting Methods states:

Targets based on effect size of 0.1 For percentages, when the target is set based on a directional effect size of h = 0.1, the result is a 1–5 percentage point improvement from baseline, depending on the value at baseline:

- For baseline values in the range 25%–75%, the targeted change is 4–5 percentage points. Note that for baseline values around 50%, a targeted change of 5 percentage points corresponds to a 10% change from baseline (over a 10-year period).

Targets based on effect size of 0.2 When the target is set based on a directional effect size of h = 0.2, the result is a 1–10 percentage point improvement from baseline, depending on the value at baseline:

- For baseline values in the range 25%–75%, the targeted change is 8–10 percentage points. Note that for baseline values around 50%, a targeted change of 10 percentage points corresponds to a 20% change from baseline (over a 10-year period).

The equivalent annual performance gain using the percent point improvement guidelines provided would indicate that a two-percent annual percentage point gain is suitable for utilization in credential improvement. The Idaho Title IV programs believe they can achieve even better performance and will strive for 2.5 percent percentage point improvement each year of this plan. Note: This corresponds to the higher h=0.2 effect size approach listed above.

Measurable Skill Gains

National data suggest Idaho Title IV programs are performing at the top of the second quartile in MSG rate. Regardless of this strong relative performance, Idaho Title IV programs are committing to significant improvement targets within this two-year update.

*See NCHS Statistical Note on Target-Setting Methods in the Credential Attainment section above for rationale on percentage used for MSG expectations.

While Idaho Title-IV programs have historical data on MSG now available, the target setting approach for MSG mirrors the rationale contained above in Credential Attainment. With a two-percent annual percentage point gain indicated by the TSM approach, Idaho Title-IV programs expect to outpace that performance by a full percent across the next two Program Years. Note: This corresponds to the higher h=0.2 effect size approach listed above.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES

IDVR is involved in numerous strategies to increase and improve services to individuals with disabilities being served through the statewide workforce development system. The information below describes some of those initiatives, which are ongoing.

The WIOA Advisory Group has agreed that both IDVR and the Idaho Commission for the Blind and Visually Impaired (ICBVI) will serve as lead agencies in addressing the continuing education and technical assistance needs of workforce partners in best serving individuals with disabilities. Both VR programs have evaluated VR offices for physical and program accessibility, as well as participated in the One-Stop Committee's assessment of programmatic and physical accessibility of the two comprehensive One-Stop Centers in Idaho, and numerous affiliate sites across Idaho.

The Division and ICBVI each conducted a Comprehensive Statewide Needs Assessment which included surveys of core workforce partners. The Title IV programs disseminated germane results to core partners.

IDVR's Administrator is an official, voting member of Idaho's Workforce Development Council (WDC), and IDVR's Administrator currently serves as the One-Stop Chair for the WDC.

Core program partners have received an extension on a three-year Workforce Data Quality Initiative (WDQI) grant, secured by the Idaho Department of Labor, to enhance and automate data sharing across core programs. The shared data will include performance indicator data (e.g., wage information) as well as co-enrollment information across core programs, which will be useful to help facilitate cross-agency collaboration and service delivery. Participants will be encouraged to co-enroll in applicable services at the local One-Stop to ensure participants can benefit from the full range of services available to them.

Maximization of External Resource Utilization: IDVR in concert with other workforce partners will be discussing areas for improvement within the American Job Centers. Appropriate referral and co-enrollment are top priorities in order to reduce duplication of services and maximize the array of services people with disabilities can leverage. IDVR's continued participation in the WDQI project and current participation in the DataLabs co-enrollment project will help drive appropriate referral and seeks to indicate co-enrollment when potentially beneficial. IDVR is participating in the DataLabs co-enrollment project with representatives across all core WIOA programs.

The Division will continue to participate in cross-training activities with mandatory One-Stop partners which will include sharing program contact information, eligibility criteria, and training on program services and mission.

Appropriate referral and co-enrollment indication are intended to maximize the beneficial impact of all WIOA plan partners efforts for Idahoans with Disabilities regardless of program eligibility criteria. Proper controls developed under these projects seek to ensure non-duplication of services while maximizing justified service provision to best meet the needs of Idaho.

The WIOA Advisory Group is discussing strategies in the following areas: improving public awareness and access to the workforce system, coordinating business services across partners, serving rural and remote communities, and developing a career pathways/sector strategies approach with core program partners. The following briefly describes these strategies. More detailed information can be found in Section II(b)(1) and (2)(A)(B) of the Combined Plan.

Improving Public Awareness and Access to the Workforce System – The public listening sessions conducted by the Council and partners in 2019 show several gaps that allow various opportunities for system improvement. This includes actionable messaging of the services and benefits available to both job seekers and employers. Also, increasing referrals and service coordination among programs will help to improve outcomes for those in need. The VR programs will specifically:

- Work to improve program visibility including improved marketing tools for both employers and people with disabilities.

- Continue to work with one-stop partners to provide guidance on programmatic and physical accessibility to increase quality of services for people with disabilities.
- Coordinate activities with One-Stop partners by sharing program contact information, eligibility criteria, and training on program services and mission for each core program.
- Comprehensive information and training will be provided to outside organizations, especially Community Rehabilitation Partners.

Coordinating business services across partners to ensure delivery of streamlined and high-quality solutions – As previously noted, statewide listening sessions brought to light that employers are seeking services and information in a coordinated and targeted fashion. Based on this feedback, the system must clearly identify the services each program has to offer, develop a coordinated approach to visit/serve employers, and utilize a continuous improvement approach to better serve employers. In addition, an information portal needs to be developed to include information on services available from WIOA and non-WIOA partners. The VR programs will track business services provided/delivered by staff and report this information to IDOL monthly.

Serving Rural and Remote Communities - In our activities analysis, nearly every core and partner program identified service to rural and remote areas as a significant challenge. Idaho is largely a rural state, so the importance of this priority cannot be understated. Some WIOA partners have modified service delivery strategies to better reach rural and remote Idahoans and the system is interested in evaluating the success of the model and expanding it as appropriate. The VR programs will collaborate with One-Stop partners, including libraries, to establish information and referral procedures for serving individuals with disabilities in rural communities, where VR lacks a physical presence. The Idaho Commission for Libraries continues to be a valuable partner toward expanding options for workforce participants in rural communities across the state.

Career Pathways/Sector Partnerships - Our economic analysis revealed that many of Idaho's in-demand and high-growth occupations are in industries such as manufacturing, trades, retail and service, construction, and health care. The Council, in partnership with the State Board of Education and the state's Chamber of Commerce, is beginning to evaluate skills and certifications that are valued across industries to transform the delivery of workforce training and education. The VR programs will specifically:

- Contribute to the sector approach established by the IDOL.
- Train staff and expand utilization of the career pathways established by ICTE, including the Career Atlas tool.
- Explore the development of similar tools for pathways common to quality VR outcomes.
- Continue to focus on and train staff to use IDOL or other sources of local area LMI (e.g. Career Index Plus, CIS) to better inform customers' employment goal selection.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

The Division's latest Comprehensive Statewide Needs Assessment (CSNA) process was finalized and published in April 2020. This CSNA has been used to inform our latest goals and priorities and to develop strategies to achieve the goals and priorities within IDVR's four-year work plan.

The agency's goals and priorities have been outlined in section (l): state goals and priorities. This section (o) has addressed the program specific strategies to achieve the goals and priorities and related these to the CSNA and other data sources to support these arguments. This information in concert with the initiatives laid out in the combined plan operational elements iii.a precisely addresses how the State will approach these priorities.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

IDVR will continue to maintain the two ongoing primary innovation activities, supporting the activities of both the State Rehabilitation Council (SRC) and the State Independent Living Council (SILC). The SRC serves as IDVR's advisory council and together with the Division and the CSNA inform the goals, priorities, and strategies for agency.

Additionally, the Division is targeting CRP services, Benefits Planning, and Customized Employment as Innovation and Expansion needs. These innovation activities are driven by WIOA regulatory changes and information derived from the past two CSNAs

The Division is particularly interested in designating funds for the purpose of improving the quality of CRP services to individuals with disabilities. The Division will evaluate the best approach for improvement, including input from the CRP community, and allocate resources to begin this innovative activity. It is expected that the Division will begin this process in earnest in PY2022 and continue efforts into PY2023. As of 2021 the Division has a dedicated CRP Manager position created and filled. IDVR is currently working toward an overhaul of the IDVR fee schedule and structure as a prerequisite to the formal CRP innovation project.

The expansion of Benefits Planning services to individuals who are SSI/SSDI recipients:

The Division historically has used the services provided by Montana State University, Billings, Work Incentives Planning and Assistance Program (WIPA), however, this service is only for those individuals with disabilities who are employed. The Division has prioritized the delivery of benefits counseling to customers who receive Social Security Disability benefits to promote better informed decisions regarding work, and to resolve any ambivalence/anxiety about losing benefits, as early in the VR process as possible. The Division engaged in two separate Invitations to Bid (contracts) through the Division of Purchasing to solicit vendors interested in providing this service to IDVR customers. The first bid solicitation, November 2020, resulted in sufficient bids in half of the regions across the state. The second bid solicitation, August 2021, resulted in having sufficient vendors across the entire state. The Division took the opportunity to expand Benefits Planning services in the second contract, based upon lessons learned from the first contract. Staff have been trained on the immense value of this service and referrals continue to increase. The Division actively monitors referrals and vendor performance.

The expansion of Customized Employment (CE) services through a pilot relaunch (Pilot 2.0):

IDVR engaged in an initial pilot program to launch CE services in three pilot sites across Idaho. The Division worked closely with WINTAC and our CE training provider, Griffin-Hammis Associates to train educators, CRP staff and IDVR staff including five-days of face-to-face instruction and distance and in-person technical assistance. Ultimately, the CRPs who participated in the training were unable to retain the staff trained in the pilot, and subsequently IDVR was left without the capacity to deliver CE or expand CE delivery statewide.

Staff turnover continues to be a significant issue for CRPs, and the Division is exploring potential changes to the structure of the pilot to include expanding the array of providers who are recognized as qualified CE providers as well as evaluating sustainable CE training delivery models. IDVR will continue efforts in the CE Community of Practice.

While the Division intended to develop and implement a CE Pilot 2.0, COVID response initiatives required the Division to pivot and table this initiative. The Division along with all CRP vendors

have experienced significant staff and employment challenges during the past two years. CRP recruitment and retention are increasingly tenuous, and some CRP vendors have declined referrals for service provision due to their inability to hire and retain adequately trained staff.

In an effort to promote and partner with CRP vendors, the Division implemented a $2.00 an hour CRP interim rate increase. This increase is specifically targeted to raise the salaries for frontline staff. The Division intends to stand up CRP innovation and expansion activities for traditional VR services prior to the CE 2.0 launch due to the inherent difficulty in retaining trained staff during the pilot. IDVR believes strengthening foundational services should allow a better opportunity to advance with the more complex requirements of CE.

C. OVERCOME IDENTIFIED BARRIERS RELATING TO EQUITABLE ACCESS TO AND PARTICIPATION OF INDIVIDUALS WITH DISABILITIES IN THE STATE VR SERVICES PROGRAM AND THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM.

The 2020 IDVR CSNA reported that the Division has improved its outreach services to unserved, underserved and minority populations.

The agency profile in o.3 shows IDVR's sustained improvement in equitable access and participation. The Division has exceeded a ratio of minority service to non-minority service ratio of 1.00 for a program year the first time under WIOA achieving a rate of 1.006 for PY 2020. Significant gains in service outreach, an emphasis on accurate coding of race and ethnicity status, and Pre-ETS expansion and outreach are all potential contributors to this trend. The Division continues to improve initiatives to identify and remove barriers to access:

IDVR's Administrator has championed outreach as a priority moving into 2022. By early January 2022, all Regional Managers will have developed a regional outreach strategy specific to their areas.

Staff recommendation to improve services contained in the CSNA indicated the next focus should be on transition age youth. Sections (o)(3) and (o)(4) of IDVR's program specific strategies (contained above) further elaborate on how the Division will address equitable access and participation as it relates to this section, including coordination of outreach efforts with combined plan partners at IDOL.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

Goal 1 - Provide quality, relevant, individualized vocational rehabilitation services to individuals with disabilities to maximize their career potential

Priority 1 - Expand, monitor, and improve pre-employment transition services (Pre-ETS) to students with disabilities and similar services to youth.

The Division began collecting new baseline data for the number of students receiving Pre-ETS and has initial data in PY 2016 with the first full year of data in PY 2017 with 1180 students receiving at least one Pre-ETS activity. PY 2018 number dipped 19.7 percent to 947 students receiving at least one Pre-ETS activity however these numbers rebounded in PY 2019 to 1013 students and further increased in PY 2020 with 1209 students receiving at least one activity. IDVR requires more data to determine whether this is due to natural regression, or other yet to be determined factors. Additionally, IDVR has experienced a division wide decrease in overall applications for all services. The Division will continue to monitor these indicators and will respond accordingly as the numbers solidify.

The Division continues to evaluate and improve services to students. The transition coordinator, along with other transition staff, developed a strategic plan in Fall 2021with the goal of systematically advancing the Division's delivery of Pre-ETS. This latest strategic plan for Pre-ETS expansion and improvement is detailed in section 'd' of this plan.

Priority 2- Provide a comprehensive array of services to individuals with disabilities, including individuals with Most Significant Disabilities (MSD).

IDVR engaged in a sustained expansion of Supported Employment services, including a heightened focus on employment stability prior to the transition to long-term supports. SE expenditures per case have decreased during COVID-19 averaging $1,661 in SE expenses per SE case per year. This is down from 2,345 in PY 2018 but still higher than the $1218 per case baseline in PY 2016. This increase helped promote initial stability through additional hours of Job Coaching for individuals to master the essential function of the position to employer satisfaction.

The Division has hired a Community Rehabilitation Programs Manager who is currently engaged in a rate methodology evaluation for all traditional CRP services. This position will be directly involved in the Innovation and Expansion activities targeted at CRP improvement and will assist in IDVR's next Customized Employment project.

The Division has introduced stronger guidance, for staff and CRPs, on fading and appropriate reduction of support over time to ensure strategies are in place to either address current issues on the job or determine a base level of ongoing support required prior to transition to ongoing support services. These efforts are ongoing, and the Division is currently working through public comment to enhance this guidance in a new iteration of the IDVR's CRP Manual. Enhanced guidance on fading and documenting progress necessary to justify the continuation of SE services will be major components of the next manual revision.

The Division is currently structuring a second pilot to address challenges experienced in the first attempt to launch CE in Idaho. The Division anticipates a relaunch of Customized Employment 2.0 sometime in PY 2022-2023 following the CRP rate assessment project.

The Division has received intensive TA from WINTAC and is currently engaged in WINTAC's Community of Practice (CoP) on both Supported and Customized Employment.

The Division has executed its Strategic Plan to Expand Benefits Planning to Idaho's customers with MSD. Initial Benefits Planning Services were launched PY 2020 with the service achieving statewide availability in PY 2022. Benefits Planning has been identified as a priority by Idaho's State Rehabilitation Council, and IDVR's field management and this initiative realizes a long-term shared goal for the SRC and IDVR

Priority 3 - Hire and retain qualified staff to deliver quality vocational rehabilitation services.

IDVR has had significant challenges recruiting and retaining qualified staff over the past several years and this has been even more evident over the past year. To increase IDVR's effectiveness in hiring and retaining qualified staff especially for the QRP positions the following strategies have been implemented or will be within the year:

- Flexibilities in work schedules
- Tuition and allowed work time for schooling requirements for staff working to achieve CSPD standard
- Paid Internship opportunities for students that meet CSPD Education credentials

- Collaborating with Division of Human Resources to demonstrate need for increased wages for State employees to be competitive
- Improved Job Announcements

Furthermore, IDVR has implemented a QRP Stabilization program, effective 11/29/2021 which implements the following recruitment/retention strategies:

1. Bonus program for newly hired QRPs effective immediately for as long as our budget permits as follows: sign-on bonus ($2500 with second paycheck – no service commitment), recruitment bonus ($2500 upon satisfactory completion of probation with 1 year service commitment from pay date of bonus), and retention bonus ($2500 upon completion of 1 year of service with no documented performance issues in exchange for 1 year service commitment from payment date)
2. Retention bonuses in the amount of $5000 for each incumbent QRP staff member in exchange for a service commitment of 2 years from the pay date of the retention bonus.
3. Increase in the hire rate for the Vocational Rehabilitation Counselor job title to $24.04 per hour.

Priority 4 - Improve usage of Labor Market Information/Career Pathways to inform customer career choice.

IDVR continues to use the Career Index Plus and the Idaho Department of Labor tools and resources to advance this priority.

The Idaho Department of Labor is regularly invited to IDVR's Inservice to provide training on local labor markets and IDOL tools available, including accessing local labor economists, to better understand local area conditions. Training on Comprehensive Assessment incorporating local labor market data is a continued emphasis for the agency. The Division continues to evaluate career pathways tools to assist counselors and customers in promoting informed decisions on vocational goals and potential career arcs, however improvements to the career pathways initiative is still a need for the agency.

The Division included an evaluation of LMI present in Comprehensive Assessments in its 2019-2021 Case File Review Seasons and will be promoting greater utilization of local (or anticipated) labor market for the vocational goal of choice. The 2022 version of the instrument will isolate local LMI analysis as a distinct item within the assessment to better gauge the impact of training. The Combined portion of this plan outlines new tools developed in a partnership with IDOL, the Idaho STEM Action Center and the Idaho Workforce Development Council which will be a part of systemwide training to promote the utilization of live LMI dashboards.

Goal 2 - Improve VR program efficiency through continuous quality improvement activities

Priority 1 - Meet or exceed negotiated targets on Primary Performance Indicators 1-5 established by the US Department of Education, Rehabilitation Services Administration.

As of September 2019, Idaho's core program partners have all signed on to the State Wage Interchange System (SWIS) and will now be able to gather additional out-of-state data from other SWIS states. IDVR has met or exceeded all negotiated targets with RSA in this two-year period.

IDOL secured a Workforce Data Quality Initiative WDQI grant from US DOL with expressed support from the Division. IDVR is working with the WDQI lead and other core WIOA programs to leverage the WDQI resources to improve and automate the exchange of secure co-enrollment data and other critical shared elements of importance to the group. As a result of efforts

identified in the WDQI, core programs should realize more efficient and secure data exchange of required WIOA data elements needed by multiple core partners.

IDVR now has data online for all Primary Performance Indicators 1-5 and is well positioned to use these indicators, alongside other measures to monitor performance under WIOA.

Priority 2 - Revise IDVR's Customer Satisfaction Survey in collaboration with the State Rehabilitation Council to increase the response rate, retention rate, and overall satisfaction rate.

Priority 2 has met most of the major goals outlined. The agency will continue to monitor the overall satisfaction rate for customers now that the CSS is stable and operating as intended.

Priority 3 - Maximize the utilization of comparable benefits.

Preliminary attention has been given to this priority and understanding comparable benefit utilization and documentation is a current focus area for IDVR's Case File Review. Emerging data suggests a need to further information and communication activities to not only maximize the utilization of comparable benefits and services, but also to better document these benefits on the plan when they are used. The Division is not currently satisfied with our level of comparable benefit quarterly reporting and is working toward improving the utilization and accurate reporting of comparable benefits.

IDVR is working to increase appropriate referral to American Job Center Network Partners in local areas: IDVR's administrator is Idaho's Workforce Development Council One-Stop chairperson, and in this capacity has increased local area engagement between WIOA combined plan partners and other stakeholders. This is accomplished via multiple monthly in-person meetings to facilitate better understanding of programs and increase utilization of available resources and expertise. This should have an impact on volume and validity of referrals to comparable services and resources and a corresponding increase in co-enrollment between combined plan partners. The Division is also involved with the DataLabs project which seeks, in part, to identify potential co-enrollment opportunities to increase meaningful co-enrollment with other WIOA partners.

The Division has also issued recent guidance clarifying the scope of comparable benefits and included procedures for better documenting comparable benefits on the IPE.

IDVR is using RSA's data dashboards as a part of its data validation strategy. In this analysis the Division has uncovered a flaw in how these are represented in the report through the Aware case management system. IDVR is working hand-in-hand with Aware to better understand and rectify this reporting error.

Priority 4 - Increase IDVR integration with the workforce development system.

The IDVR Administrator is the Workforce Development Council (WDC) One-Stop Committee Chair. The Committee has prioritized numerous activities since the last State Plan, including:

- Idaho's One-Stop/American Job Center structure has been formalized including: two comprehensive centers (Idaho Falls and Lewiston), and the designation of affiliate sites, and network partners.
- A cost sharing agreement between WIOA partners has been completed August 2021 and is now in effect.
- Conducting both physical and programmatic accessibility of comprehensive, affiliate, and network partner sites.

- Co-enrollment information is now being exchanged, however efforts to increase relevant co-enrollment are advancing through combined plan partner efforts including IDVR direct participation in WDQI and DataLabs co-enrollment focused projects.

Priority 5 - Evaluate IDVR assessment expenditures.

While the evaluation of assessment expenditures remains a priority for the agency, progress on this priority was minimal this PY. The Division is committed to launching and finalizing our off-season evaluation of assessment expenditures in PY 2022.

Priority 6 - Revise internal case review process to align with WIOA requirements and inform the continuous quality improvement cycle.

Priority 6 has been met in whole and is an institutionalized cyclical activity in IDVR's continuous quality improvement strategy. This priority will be removed or substantially modified in the next state plan.

Priority 7 - Collaborate with Community Rehabilitation Program partners to improve the quality of services.

IDVR continues to improve how we communicate with and work with our Community Rehabilitation Providers (CRPs). Fundamental to these changes was the establishment of a formalized CRP Manual articulating and clarifying expectations and requirements around billing, service delivery, monitoring, pilot CRP projects, rural and underserved areas and frequently asked questions. The Division is in the middle of a revision phase and is currently collecting comment from internal field staff and CRPs to make incremental improvements to the guide and will continue to do so over time. While a new Manual was slated for release in January 2022, this update has been postponed in conjunction with the creation of a CRP Manager position to help meet this priority which was filled 11/1/2021.

Customer Satisfaction Survey results for CRP services (including assessment services) are particularly low and continue to indicate a strong need to act on this priority.

IDVR realizes a need to further enhance collaboration with CRPs to work on a variety of services from assessment, to job development and placement and to include supported and customized employment. Data from both the 2016 and 2020 CSNA strongly indicate a need to utilize Innovation and Expansion funds to elevate the quality of CRPs in the coming state plan. This will be a primary emphasis for the Division in this plan.

Goal 3 - Meet the needs of Idaho businesses

Priority 1 - IDVR to be recognized by the business community as the disability experts in the workforce system.

IDVR provides coordination of employer related outreach efforts within the Division and coordinated services under the aegis of WIOA through partnerships with Titles I-IV and other combined state plan partners. IDVR continues to evolve services provided to business and has plans for continued the growth and expansion of the business relations team, additional training for IDVR staff, increase of services provided to business, as well as increasing coordinated services to business with partners.

IDVR continues to engage in coordinated business services internally through the Business Engagement Leadership Team. This team is comprised of at least one IDVR staff representative from each region, with the activities of the team directed by the Business Relations Manager. Regional Manager representation is also present within the team with two of eight Regional Managers providing support.

IDVR completed strategic planning sessions in the fall of 2020 to identify the next steps needed to further develop and increase agency performance serving business customers. The strategic

planning sessions took place over four different sessions where agency business engagement activities were discussed, evaluated, and identified needs were prioritized. Following the strategic planning sessions, the feedback was synthesized into a working plan.

The goals of the working plan identified various areas of focus over the next five years including the implementation of minimum performance expectations for each IDVR job category, increasing staff competency when connecting with business/providing services, development of a communication plan for business engagement, to establish the Division as a resource to business, to develop a strategy for completing business engagement activities with outside agencies and partners, and to increase overall agency business engagement performance. Significant Division progress towards these goals has been made since the development of this business work plan.

IDVR has revised the identified job descriptions to include business engagement into the job classification descriptions. Additionally, regional Business Engagement Plans were developed and implemented including an outline of goals for business engagement. These goals include the utilization of a team approach within each region that allows staff to participate in business engagement activities in various ways based upon their individual strengths.

Staff competency across the Division has been increased through addressing training and competency at the regional level as identified in each Regional Business Engagement plan, as well as training delivered by the Business Relations Manager. Training delivered to each region by the Business Relations Manager has been identified based upon review of agency performance and review of staff needs that have been identified. Regional training has been identified and provided based upon review of the specific needs staff of that team. Additionally, a formal training outline to provide training to identified staff upon the completion of their entrance probationary period has been developed.

With the multitude of changes that have been implemented, there has been an increase in the variety and quality of services provided to businesses. Division staff are providing more support to businesses in Workforce Recruitment Assistance, Training Services, and Accessing Untapped Labor Pools than in prior years. These quality services provided to business have increased from 18% (179) of services provided to business in 2018, to 21% (148) in 2020 and to 33% (261) to date in 2021. Additionally, quality relationships with business and number of services provided to business customers are expected to continue to grow with the outlined goals related to quantity and quality of engagements with business in each Regional Business Engagement plan and through continued implementation of the Division's Business Engagement Strategic Plan.

IDVR is currently evaluating the potential expansion of the Business Relations team to improve the quality of services provided to business, with expanded capacity to provide additional services. This evaluation is for the purpose of determining the capacity required to allow the Division to meet the vision of the program and to align with the goals under WIOA to increase employer services and partnership with WIOA partners at the local level to allow for increased and effective collaboration.

IDVR will continue to coordinate business outreach efforts with the Idaho Department of Labor, and their business outreach team which serves as the central point of contact for WIOA coordinated business outreach activities. IDVR will continue to participate in the One-Stop Teams to enhance partnerships with Titles I-IV and other combined state plan partners throughout the state. The partnership for serving Idaho Business will be elevated with an enhanced partnership and collaboration for serving Idaho Businesses, through Apprenticeship, under the DOL Apprenticeship Grant.

IDVR's Business Relations Coordinator is engaged with the National Employment Team (the NET) and attends the national conference in addition to receiving regular updates, conference

calls provided through a NET community of practice. IDVR also has a working group through federal Region X (WA, OR, AK, ID) where business engagement leads from each state share best practices and approaches. Additionally, the business engagement leads in Region X are working to expand joint services to businesses that have a multi-state presence to better meet the needs of Region X businesses.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

Factors that impeded the achievement of goals and priorities are discussed within the narrative of the preceding section (p)(1)(A) under their respective goals and priorities. Globally, the COVID-19 pandemic has had a deleterious effect on the advancement of goals and priorities listed in (p)(1)(a), particularly with innovation and expansion activities, and projects like the CE pilot 2.0. Hiring and retention continue to be issues which are exacerbated by the pandemic.

2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

IDVR is the DSU administering the Supported Employment program under 34 CFR 363 for the State of Idaho. IDVR provides supported employment services for eligible customers with the most significant disabilities.

Section L. 2 contains goals and objectives for the VR and SE programs.

The Division anticipates being able to serve approximately 181 individuals in SE plan status annually with the $300,000 available in the SE Supplemental grant at an average cost of $1,661, and further supplements these funds with general funds once exhausted. As noted in section K.2.B., IDVR anticipates between 459-482 customers will require SE services in a plan annually during this plan period estimating total SE expenditures between $762k-$800k annually.

WIOA has a financial requirement for Title VI, Part B funds. IDVR is required to set aside 50% of these supplemental funds for service provision to youth with disabilities and provide a 10% state match to these funds. The Division anticipates it will spend these funds and more in the coming year on students and youth. The Division does not anticipate any issues expending the $150,000 set aside for SE services, and Extended Services to students and youth. The Division has and will continue to supplement Title VI, Part B funds when needed with Title I grant funds.

Supported Employment related goals include a specific strategic plan employment rate goal at 2nd and 4th quarter and intersect with several global VR program goals relating to service improvement. This section will outline current progress toward achieving SE relevant goals contained in this state plan and IDVR's Strategic Plan.

IDVR's Goal 1 Priority 2 concentrates on ensuring an array of services, including quality supported employment services, are available for individuals with Most Significant Disabilities in Idaho. Under Goal 1 Priority 2, SE Goal 1.1 and 1.2 are reported annually in IDVR strategic planning and performance evaluation process:

State Plan Goal 1 Priority 2 - Provide a comprehensive array of services to individual with disabilities, including individuals with Most Significant Disabilities (MSD).

The Division utilizes the following Primary Performance Indicators along with supplemental customer satisfaction and other data to gauge performance toward achieving SE goals and priorities.

SE Goal 1: To promote quality SE service provision through stability as demonstrated by 2nd and 4th quarter employment rates for customers who received SE services.

- Performance Measure SE 1.1: For all successful Supported Employment closures: the percentage of customers employed in the 2nd quarter after exit.
- Performance Measure SE 1.2: For all successful Supported Employment closures: the percentage of customers employed in the 4th quarter after exit.

Performance Measure SE 1.1 and 1.2:

	PY19	PY20	Benchmark
2nd Quarter SE Employment Rate	81.67%	77.77%	≥60%
4th Quarter SE Employment Rate	76.13%	67.56%	≥50%

While benchmark goals were met for IDVR's SE employment rate goals, performance regressed slightly for second quarter outcomes between PY19 and 20. Fourth quarter employment rates for SE were significantly higher, while substantially outpacing the 50 percent or greater benchmark. Employment rates for Idaho in this period did vacillate due to initial COVID restrictions and ripple effects across the labor market but have returned to pre-pandemic levels. The Division will continue to monitor these rates for SE customers, particularly against the potential impact CRP innovation and expansion activities outlined in this state plan may have on this population.

The Division is also looking at 2nd and 4th quarter median wage over time as a potential indicator of SE quality services.

	PY19	PY20
2nd Quarter Median Wage	$948.60	$814.09
4th Quarter Median Wage	$818.12	$1,055.18

Second quarter median wage for SE fell 14 percent from PY19 to PY 20, while 4th quarter median wage increased by nearly 29 percent across the same period. The agency will continue to monitor SE 2nd and 4th quarter median wages over time to establish a better understanding of normal performance prior to deciding on whether to formalize this indicator. The Division expects to maintain or improve performance in general over this stable benchmark.

Goal 2 Priority 2 of IDVR's section of the State Plan is to continue to monitor IDVR's Customer Satisfaction Survey in collaboration with the State Rehabilitation Council and work together on strategies to increase the overall satisfaction rate. Furthermore Goal 2 Priority 5 is to improve the overall quality of CRP services.

As a function of its consumer satisfaction survey, IDVR collects information on the satisfaction of consumers who received services from CRPs through an enhanced section of the instrument. The Division continues to explore options to improve this instrument. While the Division askes multiple satisfaction questions on CRP services, core CRP satisfaction is gauged by the following item:

Customer Satisfaction with CRP Services (Exited after Plan with CRP Service Authorizations): "I would recommend the Community Rehabilitation Provider(s) that assisted me to others in my community who need similar services."

	Strongly Agree	Agree	Disagree	Strongly Disagree
PY2019	44.94%	31.01%	16.46%	7.59%
PY2020	44.44%	30.30%	7.07%	18.18%

The Division is concerned with the increase in Strongly Disagree on CRP services from PY19-PY20 and will continue to monitor this shift but believe it may be an artifact of the pandemic.

The Division had committed to a sustained campaign to improve frontline services to individuals with disabilities offered by Idaho's Community Rehabilitation Providers in the 2020 state plan update (to include Supported Employment). Unfortunately, these efforts were placed on hold as the agency pivoted to adapt to the COVID-19 pandemic. However, the Division has reclassified an FTE, developed a new position, and hired a dedicated Community Rehabilitation Program Manager to lead these improvements, and this strategy is now under implementation.

Expansion of service delivery options remains an expressed need in more rural and remote areas of Idaho, while indicated improvements were for traditional CRP and Pre-ETS services remains an agency priority, including a need for more relevant community-based assessment options, stronger local area collaboration between IDVR and providers, and timeliness to CRP service initiation. The Division is currently developing a live dashboard tool for CRP service availability, including live data on Supported Employment service availability and ongoing support service availability for transfer once SE customers have achieved employment stability.

The Division is committed to engaging in innovation and expansion activities designed to establish, develop and/or improve Community Rehabilitation Programs (CRPs) across Idaho. Based on sustained demonstrated need highlighted in the past two Comprehensive Statewide Needs Assessments and aligned with the joint goals of IDVR's administration and IDVR's State Rehabilitation Council the Division is currently exploring several potential initiatives (more detail on these options can be found in IDVR's Innovation and Expansion section of this state plan) to promote quality CRP outcomes including but not limited to:

- Promoting the Professionalization of CRP Staff:
- Reconciling IDVR's CRP Fee Schedule for WIOA Expectations:
- Clarifying Expectations/Information and Communication:
- Strengthen the Feedback Loop with CRPs:
- Targeted Evaluation of CRP Services for Effectiveness:

IDVR is engaged in a structured cyclical program evaluation strategy to maintain and improve the quality of services provided to customers through community rehabilitation providers statewide.

IDVR generates annual CRP employment reports for each vendor who provided services in the past fiscal year. The tool provides information to customers to enhance informed choice while they are selecting a CRP. These reports contain aggregated data gathered from our case management system. Information provided includes number of cases served, employment outcomes, average hourly wage of consumers who exit the program successfully, average hours worked per week per consumer, average annual earnings per consumer, employer sponsored benefit rate of those successful closures, the top five occupational outcome categories, and the primary impairments of those served. Counselors provide this information in a manner the consumer can understand to help promote informed choice.

The Division works closely with other state entities who fund ongoing support services beyond SE to provide extended supports where necessary, including extended services to youth that

would otherwise be funded by IDVR under 34 CFR 363.22. The Division works to implement a natural supports strategy where indicated.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

The current labor market and fiscal conditions make recruitment and retention significant ongoing challenges for many of Idaho's Community Rehabilitation Programs. The Division continues to see a decline in Community Rehabilitation Programs across the state. Furthermore, in some regions, IDVR personnel are having difficulty finding CRP to provide core service delivery, even for traditional CRP services. Record sustained unemployment across Idaho has created an environment where CRP staff can often receive nominal wage increases to work entry level positions in their local labor markets. CRPs are in many cases unable to compete for these staff.

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

Table 1: Historical Performance of IDVR on 116 Primary Performance Indicators (actual/non-adjusted)

Primary Indicator of Performance	PY 2018	PY 2019	PY 2020	PY 2021
Employment Rate – 2nd Quarter after Exit	53.6% (ETA9169)	59.3% (ETA9169)	58.9% (ETA9169)	
Employment Rate – 4th Quarter after Exit	53.1% (IDVR)	54.6% (ETA9169)	57.3% (ETA9169)	
Median Earnings – 2nd Quarter after Exit	$3734 (ETA9169)	$4055 (ETA9169)	$4259 (ETA9169)	
Credential Attainment	26% (Aware data)	3.8% (ETA9169)	40.3% (ETA9169)	
Measurable Skill Gains	35.3% (ETA9169)	51.2% (ETA9169)	52.6% (ETA9169)	
Effectiveness in Serving Employers	--	--	--	--

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED

IDVR provided funding support for the State Rehabilitation Council expenditures including travel, lodging, supplies, meeting room rentals, interpreters when necessary, facilitation services. Due to COVID-19, I&E expenditures for FFY21 dropped to 12 percent of FFY19 SRC expenses as the SRC relied on distance technologies provided by IDVR.

FFY 2020 Cost: $7,075

FFY 2021 Cost: $2,911

IDVR funds the State Independent Living Council (SILC) for the purpose of Innovation and Expansion activities. Title I funds reserved for the SILC were used to support personnel and functions necessary for the operation of the SILC. SILC I&E expenses were also down to 70 percent of FY19 expenses.

FFY 2020 Cost: $99,461

FFY 2021 Cost: $96,176

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES

The Idaho Division of Vocational Rehabilitation (IDVR) provides the full scope of Supported Employment Services (SE) to those Vocational Rehabilitation (VR) eligible customers with the most significant disabilities, who require extended services to maintain employment. Supported employment services are available to individuals with the most significant disabilities, including youth with the most significant disabilities.

Supported Employment Services include the following:

Time limited services needed to include job coaching and communication with the employers, to support training while the individual is employed. Continued funding of SE cases is contingent upon progress toward learning the essential functions of the job and/or fading hours of ongoing support to the level of employer satisfaction immediately prior to the assessment of initial stability.

Any other service that would be identified as requisite to the targeted supported employment outcome after placement ahead of transfer to externally funded ongoing support services.

SE may also include Customized Employment elements, after placement.

Youth Extended Services (YES) are available for qualifying youth in the absence of other ongoing support services available in the community.

Each customer's IPE describes the timing of the transition into extended services, which is to be provided by the long-term support provider following the termination of time-limited services by IDVR.

Fifty percent of the Title VI-B (Supported Employment) grant will be reserved for youth with the most significant disabilities; the Division will set aside a 10% non-federal matching fund to meet the requirement of §363.23. For FFY 2022 this amount will be $15,000 (Title VI-B Youth). The corresponding adult SE grant does not require a set aside.

Supported Employment Services are delivered by CRPs throughout the State of Idaho. IDVR's CRP quality assurance process is detailed in section (o)(5) of this plan.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES

WIOA extended the SE time period from 18 to 24 months. The Division has created protocols for and has made Youth Extended Services (YES) available for youth who are MSD when needed as required by WIOA. As Idaho has external funders of ongoing support services through multiple avenues, the Division does not currently have to expend YES funds.

Extended services may be provided to youth with the most significant disabilities for a period up to four years, or until the individual turns 25 and no longer meets the definition of a "youth with a disability", whichever comes first. SE services for adults shall not exceed 24 months, unless an exception is granted. Since 2004, the Extended Employment Services (EES) program has been housed under IDVR and along with Medicaid are the two providers of long-term funding for extended services in Idaho. A supported employment participant may only be transitioned to long term support based on an assessment of rehabilitation goal achievement and job stability.

Stability Assessment and ES Timing:

If external sources of LTS are not available, a stability assessment must include consideration of ability to sustain employment in the absence of external LTS utilizing natural supports (NS). In cases where NS would not satisfy the needs of the employer, SE services will continue until external LTS funds become available, or customer stability is achieved under a NS strategy (up to 24 months unless exception is justified). Periodic monitoring occurs to ensure that each customer receiving SE services is making satisfactory progress, including twice-monthly requirements to document progress toward these goals.

VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY WIOA[14], AND ITS SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT[15];

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Idaho Division of Vocational Rehabilitation

2. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (ENTER THE NAME OF DESIGNATED STATE AGENCY)[16] AGREES TO OPERATE AND ADMINISTER THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[17] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[18] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER SECTION 111 OF THE REHABILITATION ACT ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

ENTER THE NAME OF DESIGNATED STATE AGENCY

Idaho State Board of Education

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY AGREES TO OPERATE AND ADMINISTER THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[19] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[20] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER TITLE VI ARE USED SOLELY FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES AND THE ADMINISTRATION OF THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

4. THE DESIGNATED STATE AGENCY AND/OR THE DESIGNATED STATE UNIT HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Jane Donnellan

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

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

CERTIFICATION SIGNATURE

Signatory information	Enter Signatory information in this column
Name of Signatory	[Jane Donnellan]
Title of Signatory	[Administrator]
Date Signed	[03/08/2022]

ASSURANCES

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

The State Plan must include	Include
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:Administration of the VR services portion of the Unified or Combined State Plan:	
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	
3.b.(A) “is an independent State commission” (Yes/No)	No
3.b.(B) “has established a State Rehabilitation Council” (Yes/No)	Yes
3.c. Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act	
3.d. The financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3)	
3.e. The local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.g. Statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided	Yes

The State Plan must include	Include
under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	
3.h. The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.k. The compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act	
3.l. The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities	
3.m. The submission of reports as required by section 101(a)(10) of the Rehabilitation Act	
4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.b. Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act	
4.c. Provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with	Yes

The State Plan must include	Include
disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
4.e. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.f. Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act	
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act	
4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14)of the Rehabilitation Act	
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	

The State Plan must include	Include
5. Program Administration for the Supported Employment Title VI Supplement:	
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	
5.c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	
6. Financial Administration of the Supported Employment Program:	
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to 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	

The State Plan must include	Include
individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act	
7. Provision of Supported Employment Services:	Yes
7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act	
7.b. The designated State agency assures that:	
7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act	
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	58.9%	59.5%	58.9%	60.0%
Employment (Fourth Quarter After Exit)	57.3%	57.8%	57.3%	58.3%
Median Earnings (Second Quarter After Exit)	$4,365	$4400	$4,472	$4500
Credential Attainment Rate	42.8%	42.8%	45.3%	44.0%
Measurable Skill Gains	55.1%	55.1%	57.6%	57.6%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (BLIND)

A. INPUT OF STATE REHABILITATION COUNCIL

1. INPUT PROVIDED BY THE STATE REHABILITATION COUNCIL, INCLUDING INPUT AND RECOMMENDATIONS ON THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN, RECOMMENDATIONS FROM THE COUNCIL'S REPORT, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION, AND OTHER COUNCIL REPORTS THAT MAY HAVE BEEN DEVELOPED AS PART OF THE COUNCIL'S FUNCTIONS;

The Idaho Commission for the Blind and Visually Impaired (ICBVI) falls under a Commission of 5 Board Members (ICBVI Board) who are appointed by the Governor of Idaho. The ICBVI Board holds four meetings a year that are open to the public and a designated consumer input time is always on the agenda. The ICBVI Board reviews and approves all policy regarding the Vocational Rehabilitation Program at ICBVI. Any recommendations by the ICBVI Board are discussed at the public meetings.

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

Does not apply (see a(1))

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

Does not apply (see a.(1)).

B. REQUEST FOR WAIVER OF STATEWIDENESS

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

Services provided under the State Plan are available in all political subdivisions of the state.

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

The state unit may provide services in one or more political subdivisions of the state that increase services or expand the scope of services that are available statewide under this State Plan if the:

a. non-federal share of the cost of these services is met from funds provided by a local public agency, including funds contributed to a local public agency by a private agency, organization or individual;

b. services are likely to promote the vocational rehabilitation of substantially larger numbers of individuals with disabilities or of individuals with disabilities with particular types of impairments; and

c. state, for purposes other than the establishment of a community rehabilitation program or the construction of a particular facility for community rehabilitation program purposes, requests in attachment 4.7(b)(3) a waiver of the state wideness requirement in accordance with the following requirements:

- identification of the types of services to be provided;

- written assurance from the local public agency that it will make available to the state unit the nonfederal share of funds;
- written assurance that state unit approval will be obtained for each proposed service before it is put into effect; and
- written assurance that all other State Plan requirements, including a state's order of selection, will apply to all services approved under the waiver.

3. REQUIREMENTS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN WILL APPLY TO THE SERVICES APPROVED UNDER THE WAIVER.

Contributions, consistent with the requirements of 34 CFR 361.60(b)(3)(ii), by private entities of earmarked funds for particular geographic areas within the state may be used as part of the nonfederal share without the state requesting a waiver of the state wideness requirement provided that the state notifies the commissioner that it cannot provide the full nonfederal share without using the earmarked funds.

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

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

ICBVI has the following cooperative agreements:

Idaho Educational Services for the Deaf and Blind (IESDB): This agreement outlines how the two agencies will coordinate referrals, data sharing, services and communication to benefit the transition of students with blindness and visual impairments throughout the state.

Idaho Division of Vocational Rehabilitation (IDVR): This Memorandum of Understanding (MOU) establishes guidelines and policies to delineate the services both agencies will provide to individuals with disabilities. Furthermore, this agreement enhances cooperation and collaboration between the two agencies, improves inter-agency communication, and establishes staff cross-training opportunities.

Tribal VR (Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Bannock Tribe, and Shoshone/Paiute Tribe): ICBVI, along with IDVR entered into one collaborative cooperative agreement with three of the four federally funded Tribal VR programs in the state, while also maintaining a single cooperative agreement with the fourth Tribal VR program. These revised cooperative agreements include the WIOA requirements, specifically to include address transition services to students and youth with disabilities.

State Department of Education (SDE): ICBVI, along with IDVR and the Idaho SDE established and approved a Memorandum of Understanding for Transition Services for Students with Disabilities, which includes the provision of Pre- Employment Transition Services, and clarifies the roles and responsibilities of each agency.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

ICBVI provides assistive technology services to participants in the state via regional Instructors of the Blind (Rehab Teachers). As part of the Comprehensive Assessment, all eligible individuals are given an assessment by the Rehab teachers to assess their assistive technology needs and levels of training that they may require. The Commissions statewide Assistive Technologist provides training and support for the regional Rehab Teachers, as well as conducting assessments when he travels to the regional offices.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

ICBVI does not engage in any programs carried out by the Under Secretary for Rural Development of the U.S. Department of Agriculture.

4. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

While ICBVI does not engage in any cooperative agreements with any noneducational agencies who serve out of school youth, the Commission does collaborate with all WIOA Core partners to identify and engage those out of school youth in the state who are blind or visually impaired.

Out-of-school youth are encouraged to complete their high school education or pursue a formal GED program whenever possible to increase their options and access to postsecondary opportunities. This includes referral to Idaho Career & Technical Education's Adult Education program. Idaho Job Corps now maintains a partnership with Idaho Universities to offer a path to a high school diploma or GED for those age 16-24.

ICBVI also connects appropriate youth to The Youth Apprenticeship Program. This program connects people, ages 16-24, to training and careers in Idaho. The Youth Apprenticeship program provides education, work experience, and access to postsecondary education, training, and certifications.

ICBVI also partners with Job Corps to develop ways to provide students with access to paid work experiences, work readiness training, and instruction in self-advocacy in addition to attending their Job Corps courses. Job Corps is now housed in regional Universities, which makes the program and other educational opportunities much more accessible for individuals serviced by the Commission. ICBVI had one individual who participated in he Job Corp program in the past two years, and is now doing her internship with a regional employer in her chosen career goal.

The Commission will be collaborating with the Idaho Department of Labor for the purpose of expanding apprenticeships in the state. The apprenticeship program in the state is a priority of the Idaho Workforce Development Council, and therefore receives strong support across the state.

ICBVI also partners with Forging Futures to serve both in school and out of school youth. Created by the Idaho Manufacturing Alliance, Forging Futures Idaho is a workforce-pipeline initiative that focuses on creating and promoting manufacturing career opportunities for Idahoans through purposeful education and connections with industry partners, resources, and community support.

5. STATE USE CONTRACTING PROGRAMS.

ICBVI does not engage in any state use contracting programs.

D. COORDINATION WITH EDUCATION OFFICIALS

1. THE DESIGNATED STATE UNIT'S PLANS, POLICIES, AND PROCEDURES FOR COORDINATION WITH EDUCATION OFFICIALS TO FACILITATE THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO THE RECEIPT OF VR SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, AS WELL AS PROCEDURES FOR THE TIMELY DEVELOPMENT AND APPROVAL OF INDIVIDUALIZED PLANS FOR EMPLOYMENT FOR THE STUDENTS

In collaboration with the Transition Coordinator, ICBVI VR Counselors and the Idaho Education Services for the Deaf and Blind (IESDB) staff coordinate with regional education officials to identify blind and visually impaired students in the K-12 school system. VR counselors regularly meet with the special education teachers, teachers of the visually impaired (IESDB Staff), school

counselors, school nurses and other personnel involved in school to work transition. A transition Individualized Plan for Employment (IPE) is developed within 90 days of eligibility determination (unless an extension is agreed upon) to assist the student with their successful transition from school to work.

To facilitate the transition of students with the disabilities, the following cooperative agreements have been established:

Idaho State Department of Education - July 2018

Idaho Educational Services for the Deaf and Blind - November 2021

Pre-Employment Transition Services (Pre-ETS): In collaboration with local educational agencies (LEA's), IESDB, and IDVR are required to offer to transition age students with disabilities (ages 14-21), Pre-Employment Transition Services (CFR 361.48(a)).

Pre-ETS are available to students with disabilities who are potentially eligible and eligible for ICBVI VR services.

In 2020, ICBVI and IDVR administration agreed to a minimum age of 14 years old that students with disabilities may begin receiving Pre-Employment Transition Services. This agreed lower threshold will be effective upon approval of this plan.

Pre-ETS include:

- Job exploration counseling;
- Work-based learning experiences, (which may include in-school or after school opportunities, experience outside the traditional school setting including internships that are provided in an integrated environment);
- Counseling on opportunities in comprehensive transition or enrollment in post-secondary educational programs;
- Workplace readiness training to develop social skills; and
- Independent living instruction in self-advocacy/peer mentoring.

In order to reach those goals, each ICBVI region is ensuring they have a strong relationship with the local school districts, Transition Councils, and One-Stop partners. State-wide Pre-Employment Transition Services and programs have been implemented and will continue to expand as the population of high school students we serve increases.

ICBVI's Project Coordinator for Transition Services is working with all state-wide LEA's to educate and inform them of Pre-ETS activities. This individual is also communicating with all staff engaged in the delivery of Pre-ETS to help develop and enhance existing referral and outreach strategies within schools.

Youth seeking subminimum wage employement

ICBVI has created a checklist for youth seeking subminimum wage employment, which includes the documentation requirements and responsibilities under Section 511. The checklist includes the requirement for a transition or Pre-ETS service to be completed prior to youth verification of Career Counseling and Information and Referral (CCI&R) under Section 511.

Under a memorandum of understanding, the Idaho Division of Vocational Rehabilitation provides CCI&R services for the state.

Responsibilities of the VR program:

The ICBVI checklist includes:

- Documentation of the provision of transition services or pre-employment transition services;
- Application for VR services;
- The provision of Career Counseling, and Information and Referral Services.

Responsibilities of the Local Education Agency (LEA):

Documentation of completion of appropriate transition services for a youth with a disability under IDEA, which includes:

- Youth's name
- Description of the service or activity completed
- Name of the provider of the required service or activity
- Date required service or activity completed

Career Counseling, and Information and Referral Services (CCI&R)

Counselors providing the service address the following elements of the VR process which includes a discussion of competitive integrated employment and services available at VR to assist the individual in making an informed choice whether or not to continue pursuit of employment with a 14(c) certificate holder.

CCI&R activities include:

- Counseling in self-advocacy, self-determination and high expectations
- Review of any assessment information available (e.g. Interest inventories)
- Person-centered planning
- Discussion of marketable skill
- Soft skills
- Review of labor market information
- SSA benefits planning

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

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

The formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains a number of provisions designed to promote communication and the sharing of technical expertise in transition planning. The agreement stipulates that the vocational rehabilitation agency must provide consultative and technical assistance services to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including employment. The agencies agree that:

- They will encourage staff to work closely with LEAs to ensure coordination between education services, pre-employment transition services, and vocational rehabilitation services.
- ICBVI and IDVR counselors will provide training and information to school district personnel, students and families on pre-employment transition and vocational rehabilitation services, including their role as IEP team members.
- ICBVI and IDVR counselors are available to consult with educators concerning preemployment transition and vocational rehabilitation services for students to assist them toward employment.
- ICBVI and IDVR counselors will collaborate with the LEAs in their service area to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
- ICBVI and/or IDVR counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student's parent or legal guardian. VR counselors may attend either in person or via video or telephone. The ICBVI and/or IDVR counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
- ICBVI and IDVR counselors will consult with educators concerning referral of students to ICBVI and/or IDVR for rehabilitation services, including pre-employment transition services. Students with blindness or visual impairments should be referred to ICBVI.
- Students with multiple disabilities may have dual cases with both IDVR and ICBVI to provide rehabilitation services.
- ICBVI and IDVR counselors will accept referrals for pre-employment transition or vocational rehabilitation services, when appropriate, and will work collaboratively with input from the student's IEP team, for service provision and/or to develop an IPE. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required vocational rehabilitation services that will move the student towards their employment goal.

The Idaho Interagency Council on Secondary Transition is established by the Superintendent of Public Instruction to advise, review, analyze, and monitor the implementation of the State's Interagency Agreement on Secondary Transition. The authority to establish this Interagency Council lies in IDEA Section 640(b)(1)(A) and regulation 300.154. ICBVI continues to be involved in the Idaho Interagency Council on Secondary Transition with the purpose of ensuring that students with disabilities experience a collaborative, comprehensive system that facilitates a smooth transition from secondary school to adult life. The goal of this group is to increase the number of youth with disabilities who are actively engaged in postsecondary education, employment, and community activities. Interagency cooperative planning, information sharing, and the collaborative use of resources assist in accomplishing ICBVI's mission at the state and local level.

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

The formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains a number of provisions designed to facilitate the development and implementation of Individualized Education Programs (IEP). The agencies agree to cooperate in the development of transitioning students' IEP and any relevant Individual

Plan for Employment (IPEs). Development of the IEP is vested with the IEP team, including the student and his/her parent or guardian. Approval of the IPE is vested with the IDVR or ICBVI, the student and his/her parent or guardian.

Idaho Interagency Council on Secondary Transition:

The Idaho Interagency Council on Secondary Transition is established by the Superintendent of Public Instruction to advise, review, analyze, and monitor the implementation of the State's Interagency Agreement on Secondary Transition. The authority to establish this Interagency Council lies in IDEA Section 640(b)(1)(A) and regulation 300.154. IDVR continues to be involved in the Idaho Interagency Council on Secondary Transition with the purpose of ensuring that students with disabilities experience a collaborative, comprehensive system that facilitates a smooth transition from secondary school to adult life. The goal of this group is to increase the number of students with disabilities who are actively engaged in postsecondary education, employment, and community activities. Interagency cooperative planning, information sharing, and the collaborative use of resources assist in accomplishing ICBVI's mission at the state and local level. Members include the Idaho State Department of Education, Idaho Division of Vocational Rehabilitation, Idaho Commission for the Blind and Visually Impaired, Idaho Educational Services for the Deaf and Blind, Idaho Parents Unlimited, Council on Developmental Disabilities, Department of Labor, Boise State University, Idaho State University, The Assistive Technology Project (administered by the University of Idaho), Idaho Health and Welfare, Juvenile Corrections, Department of Correction, and LEAs.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

Idaho State Department of Education (SDE) - Secondary Transition: Idaho Commission for Blind and Visually Impaired (ICBVI), Idaho Division of Vocational Rehabilitation (IDVR), and the State Department of Education (SDE) currently have a formal cooperative agreement. This agreement ensures a coordinated, comprehensive system focusing on students with disabilities as they transition from secondary school to post-school activities, promoting post-secondary education, vocational training, competitive integrated employment (including supported employment), continuing and adult education, adult services, independent living, and community participation emphasizing a team approach to facilitate the transition of students with disabilities from public education into employment.

This agreement addresses the following:

- Roles and responsibilities of each agency
- Financial responsibilities of each agency, including the purchase of Assistive Technology
- Outreach and technical assistance
- Transition planning
- Referral process for students with disabilities to the appropriate VR program
- Data release and data sharing
- Planning to include timeframes for development of the IPE
- Service delivery
- Dispute resolution
- Coordination and documentation requirements under section 511

- Prohibition on entering into an arrangement with an entity holding a 14(c)-special wage certificate for the purpose of operating a program where people with disabilities are engaged in work at subminimum wage.

The current agreement establishes the following roles and responsibilities for the involved parties.

The Idaho State Department of Education (SDE) agrees:

- To assume the role of lead agency in facilitating interagency planning with LEAs and implementation of educational programs and transitional services for youth with disabilities in transition from high school to post-high school services.
- To support LEAs in their efforts to write IEPs using an outcome-oriented focus and to coordinate transition activities for each eligible student, beginning no later than the IEP before the student turns age 16 years (earlier if appropriate), and to address future student needs in the areas of employment, post-secondary education, vocational training; and adult living and community participation, including assistive technology.
- To invite ICBVI and /or IDVR to provide information regarding their services, including their role as an IEP team member, to school district personnel, students and their families.
- To invite ICBVI and /or IDVR counselors, with prior consent from adult students or parents or legal guardians, as appropriate, to participate as members of IEP teams for students who have been referred of ICBVI and/or IDVR for rehabilitation services.
- To work with ICBVI and IDVR Vocational Rehabilitation (VR) counselors to identify a process for such counselors to provide input and participate in the development of a student's IEP, including pre-employment transition services, when appropriate.
- To identify appropriate school personnel who, with prior consent from adult students or parents or legal guardians, as appropriate, will initiate the referral process of students receiving special education services, and students who have a 504 Plan (Rehabilitation Act of 1973), or students with disabilities (e.g., physical, medical, or visual, etc.) who are not eligible for special education services, to IDVR and/or ICBVI for pre-employment transition services and/or vocational rehabilitation services.

Idaho Commission for the Blind and Visually Impaired (ICBVI), and the Idaho Division of Vocational Rehabilitation (IDVR) agree:

- To encourage staff to work closely with school district personnel to ensure coordination between education services and vocational rehabilitation services.
- That ICBVI and IDVR counselors will provide training to school district personnel, students and families on all aspects of vocational rehabilitation services, including their roles as IEP team members.
- That ICBVI and IDVR counselors are available to consult with educators concerning vocational rehabilitation services for transitioning students to assist them toward employment.
- That ICBVI and IDVR counselors will collaborate with the school districts in their service areas to identify a process for the counselors to provide input and participate in the development of the transition services included in IEPs.
- That ICBVI and IDVR counselors will consult with educators concerning referral of students to ICBVI and/or IDVR for rehabilitation services. Students with blindness or

visual impairments should be referred to ICBVI. Students with multiple disabilities may have dual cases with both IDVR and ICBVI providing rehabilitation services

- That ICBVI and IDVR counselors will accept referrals, when it is appropriate based on the individual needs of the student, to determine eligibility and will work collaboratively, with input from the student's IEP team, to develop IPEs. The vocational rehabilitation counselor, student, student's parent or legal guardian, and members of the student's IEP team will collaborate to identify required vocational rehabilitation services that move the student to their employment goal.
- That ICBVI and/or IDVR counselors may attend IEP team meetings for each referred student upon timely invitation by school personnel and the student and/or student's parent or legal guardian. The ICBVI and/or IDVR counselors will provide written recommendations, if requested, for use in developing IEPs when unable to attend.
- All state plan requirements, including a state's order of selection, will apply to all services provided under this cooperative agreement.

The Idaho Commission for the Blind and Visually Impaired (ICBVI) agrees:

- To continue serving school districts across the state. All Idaho school districts are served through each regional office. ICBVI does not maintain any cooperative agreements with school districts specific to the funding of school to work transition counselors.

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

ICBVI, IDVR, and the State Department of Education (SDE) currently have a formal cooperative agreement.

The agreement stipulates that ICBVI will initiate outreach and work with the LEAs to identify potential students with disabilities who need pre-employment transition services and VR transition services for students aged 14-21. This involves informing the student, or when appropriate their parent or legal guardian, as early as possible about the vocational rehabilitation program, its purpose, eligibility criteria, application procedures, and the scope of available VR services, to include pre-employment transition services.

The Commission also engaged key stakeholders in the state through the following activities:

- Collaboration at regional special educator meetings.
- Presenting at statewide administrator meetings.
- Presenting at the Tools for Life Conference to parents, students, and educators.
- Outreach to Idaho Parents Unlimited.
- Participation in the Idaho Interagency Council on Secondary Transition.
- Ongoing collaboration with the Idaho State Department of Education.
- Ongoing collaboration with the Idaho Educational Services for the Deaf and Blind.

Outreach strategies to identify students who need transition services include:

- Counselors and Rehabilitation Teachers are assigned to the school districts in their regions. Staff participate in district transition councils, meetings, and trainings.
- The ICBVI Transition Coordinator participates in district In-Service trainings across the state.

- The MOU with IESDB emphasizes regional collaboration, data sharing, and identifying secondary school students in Idaho who are blind or visually impaired.

The Commission currently working on developing specific goals to improve outreach, which include:

- Creating training and materials that will increase students' understanding about the VR process and services.
- Create opportunities and materials to use with families to increase their understanding VR Services.
- Increasing outreach activities to rural communities in Idaho.

Since the implimentation of WIOA in 2016, most students are still currently being served in the VR program. While the relationship between outreach strategies and employment outcomes is unknown at this time, ICBVI does recognize the need for program evaluation methodologies that include measures such as these.

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

ICBVI does not have cooperative agreements with private nonprofit service providers as we pay fee for service.

ICBVI has a Policy and Service Provision Agreement with several Community Rehabilitation Providers (CRP) that is updated as requested by either party. This agreement includes:

- Policies regarding the ICBVI authorization process and invoicing
- Staffing of referrals
- Dispute resolution
- Billable services
- Requirements for employment verification
- Policies around the provision of Pre-Employment Transition Services

This agreement also includes the provision of services, which include:

- All five of the required Pre-Employment Transition Services
- In-house vocational evaluations
- Community-based work evaluations
- Job search assistance
- Job readiness training
- On the job supports - short term
- On the job supports - supported employment

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

In 2018, ICBVI relinquished all of its Title VI, Part B funds to the Idaho Division of Vocational Rehabilitation (IDVR). As a result, IDVR now manages the supported employment (SE) program for the state.

ICBVI and IDVR agree to the following:

- ICBVI and IDVR agree to collaborate on all supported employment (SE) cases when the individual has a disability profile which includes blindness or visual impairment meeting the eligibility criteria of ICBVI.
- ICBVI agrees to fund services related to addressing the visual disability.
- IDVR agrees to fund employment related services.

Furthermore, ICBVI has adopted IDVR's policies around SE, which include service provider standards.

The VR program policy around the arrangement of supported employment services and extended employment services includes:

Supported employment means competitive integrated employment (CIE), including customized employment (CE), or employment in an integrated work setting in which an individual with a most significant disability, including a youth with a most significant disability, is working on a short-term basis toward competitive integrated employment that is individualized, and customized, consistent with the unique strengths, abilities, interests, and informed choice of the individual, including ongoing support services for individuals with the most significant disabilities. SE can be provided by the state VR programs for a period of time not to exceed 24 months, unless the VRC and client jointly agree to extend the time to achieve the employment outcome identified in the IPE.

SE refers to support services (such as job coaching) provided after placement and before the individual reaches initial stability, and prior to utilization of extended services (long-term supports).

Extended Services (ES) are those services, including extended services for youth, are provided after the assessment of initial stabilization when required for an individual to maintain employment (to sustain employment stability).

Extended Services for Youth: The state VR program makes extended services for youth available when youth have no comparable ES resources available in the community. Extended services can continue to be provided until:

- Comparable benefits become available (External funders are identified) OR
- Extended services are provided for four years OR The individual reaches the age of 25 and no longer qualifies under the definition of 'youth'.

Supported Employment services are only offered by qualified providers as identified under IDVR standards.

ICBVI is committed to the advancement of opportunities for Idaho citizens with disabilities, including youth with the most significant disabilities, and encourages employment in the least restrictive and most integrated environments possible. ICBVI and IDVR have established and continues to maintain strong working relationships with pertinent state agencies such as the Department of Health and Welfare (H&W). Under H&W, Home and Community Based Services (HCBS) Waiver and Aged and Disabled Waiver are the two main extended services funding sources for Idahoans in need of Supported Employment. The third funding source is the Extended Employment Services Program. This program is funded through State appropriations

only. The primary service providers for long term supports under the three main funding sources are CRPs.

ICBVI and IDVR utilize the State's Extended Employment Services program as well as the Medicaid Home and Community-Based Services (HCBS), and Aged and Disabled (A&D) waivers for long term support. The VR program will continue to work closely with each agency overseeing these resources to streamline the referral process and improve utilization of this external source of extended services funding. The following provides more detail on the working relationship between each ES entity and IDVR.

The Supported Employment Agency Recommendation must be completed, and this is done by IDVR on behalf of both state VR agencies when transitioning from vocational rehabilitation services or by the Supported Employment Agency (Community Rehabilitation Provider) identified on the plan or addendum. Documentation must include:

- Amount of Service
- Level of Support Needed
- Employment Goals
- Transition Plan

The ICBVI counselor is a member of the Person-Centered Planning Team and participates in all planning and coordination activities.

EES extended services are provided under EES policy which requires the certification of an extended employment service provider. These providers are approved by the EES program administrator on a case by case basis. All EES approved providers are also CRPs which are initially approved as CRPs under IDVR's accreditation requirement.

If a youth with a disability has been determined to need an SE strategy and an extended service funding source is not available yet, IDVR will utilize VR funds for the required timeframes or until the funding becomes available for the long-term support.

Extended services for youth can be provided up to four years as needed for youth under the age of 25 following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. Upon exhaustion of Title VI funds reserved for youth supported employment, IDVR will continue to support extended services with Title I funds, as required by WIOA, and will continue to leverage other sources of extended services.

ICBVI and IDVR support the utilization of Natural Supports where available and encourages the development of Natural Supports for all SE customers. Natural Supports are supports and services typically available to other employees OR supports created to provide supports through people or other resources typically available in the work, home, and community environment.

ICBVI works collaboratively with IDVR through the entire life of the SE case, and will continue to provide any supportive services needed to address the visual disability of the participant up to program exit.

G. COORDINATION WITH EMPLOYERS

1. VR SERVICES; AND

Through coordinated engagement, ICBVI and its workforce development partners will contribute to a more prosperous Idaho, providing businesses with talented job seekers to fill skill gaps and Idahoans living with blindness or visual impairments with the rehabilitation, training, and employment services needed to thrive in Idaho workplaces and communities.

Employers may request an Assistive Technology (AT) assessment in order to hire a person with a visual impairment or who is blind. ICBVI will provide this service at no expense to the employer. This assessment may include website and network software accessibility as well as job site accommodations. ICBVI has an AT Technologist that assists all of the VR counselors in life skills assessments job site accommodations. Additionally, in 2019, ICBVI appointed the Statewide AT Technologist to coordinate business engagement activities in the state. ICBVI will work collaborative with the Idaho Department of Labor and the IDVR Business Engagement Team in achieving WIOA business outreach activities.

In early 2020, ICBVI staff attended an IDVR sponsored strategic planning session with their Business Engagement Team (BET). The outcome of this training was to initiate a collaborative approach to business engagement activities for both state VR programs.

In December of 2021, the Commission entered an Intensive Technical Assistance (ITA) agreement with the Vocational Rehabilitation Technical Assistance Center for Quality Employment (VRTAC-QE). This project will begin in February 2022 and conclude June 1, 2022. ICBVI counselors, counselor assistants, and Rehabilitation Teachers will all be participating in this training. In addition, 2 CRP's and representatives from IDVR will also participate.

ICBVI will continue to work with employers to provide general and customized technical assistance and support services to businesses and industries including input from employers in the 2020 Comprehensive State-wide Needs Assessment (CSNA):

- Through collaboration with employers to increase internship, mentoring, and training opportunities for ICBVI participants;
- By providing training in blindness and visual impairments to employers;
- By increasing visibility to employers in Idaho through marketing and outreach to businesses; and
- Through collaboration with One-Stop partners in the coordination of services to businesses (emphasis on collaboration with IDVR).

ICBVI will also focus on areas of need identified in the 2020 CSNA in respect to recommendations on how to improve business partnerships to engage employers in recruiting and hiring individuals who are blind or low vision:

- Greater community awareness and education of individuals who are blind or visually impaired, especially in rural communities;
- Increase visibility and engagement in rural communities;
- Provide quality training and job placement services; and
- Provide outreach and education to communities and employers on ICBVI services.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

COVID-19 presented many challenges to the provision of Pre-ETS. For the past two years, residential summer programs have been cancelled and replaced with remote learning opportunities for student. Examples of curriculum include:

- Career exploration activities
- Informational interviews
- Toastmasters

- Resume building
- Career cluster activities
- Developing interview skills
- Virtual college tours
- National keynote speakers

In addition to regional activities that are put on throughout the year, ICBVI host three main summer programs:

Work Readiness Camp – This one-week program is a collaborative effort between ICBVI, IESDB, and IDOL. This program focuses on job readiness skills, and helps to prepare students for summer employment experiences, or participation in our SWEP program.

College Days – This one-week program is for students who plan to pursue higher education after high school. This program is a collaborative effort between ICBVI, IDOL, and Boise State University.

Summer Work Experience Program - Every summer, ICBVI hosts transition aged students with disabilities (SWD) for a 7-week Summer Work Experience Program (SWEP) in Boise. Students eligible for Pre-ETS from across the state participate in the SWEP program. Throughout the program, all of the five required Pre-Employment Transition Services, as identified under WIOA, are delivered. ICBVI staff work with community employers to host our students for a work experience program. Students are paired with employers based upon interest and ability.

In addition, ICBVI's Project Coordinator for Transition Services, in collaboration with regional staff, will develop and implement Pre-ETS activities and programs in every region of the state.

In 2018, ICBVI launched an innovation program entitled the Visually Impaired Students Transitioning in to Adulthood (VISTA) Leadership Program. This program is specifically for transition aged students who are eligible for Pre-Employment Transition Services (Pre-ETS). This program was put on hold during the pandemic but is scheduled to resume summer of 2022.

The definition of leadership, for the purposes of this program, is more contemporary from a theoretical perspective, with a student-informed emphasis to program design. This contemporary, strength-based approach; which leverages the student's contextual resources (e.g., healthy relationships, engagement and access to community) is consistent with the theories of positive youth development.

There are 3 elements that make up the foundation of the VISTA Leadership Program:

- Social Emotional Learning
- Service Learning
- Mentoring (both peer and adult)

The formal program is one-year in length, and graduates of the VISTA Leadership Program mentor and support the incoming cohort and will continue to be supported up to their 22nd birthday, or in the event they are no longer eligible for Pre-ETS.

H. INTERAGENCY COOPERATION

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

The Idaho Department of Health and Welfare (H&W) maintains all related programs in the state including the state Medicaid program, the state Developmental Disabilities Program, and the state Mental Health program. Under Medicaid H&W operates the Idaho Home and Community Based Services project.

Since IDVR manages the SE program for both state units, they oversee the development of policies and procedures for the program.

IDVR has collaboratively developed a draft agreement with H&W as it relates to Title XIX of the Social Security Act.

ICBVI participates in H&W sponsored trainings to support the VR staff on Medicaid services and benefits. This training enables VR staff to assist clients and families identify how those services can support success in an employment outcome.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

ICBVI has a partnership with the Adult Developmental Disabilities Services (ADDS) program under the Department of Health &Welfare (H&W). While there currently is no formal agreement; H&W is a WIOA core partner. ICBVI works closely with IDVR (who manages the SE program for the state) in the provision of VR services to individuals with developmental disabilities. ICBVI have also had trainings to educate VR staff on Medicaid services and benefits thus allowing ICBVI staff to better assist clients in achieving their employment goals.

Over the past two years, ICBVI (along with IDVR) participated with a Health and Welfare driven "Community Now" engagement model with all stakeholders and individuals that access services through Health and Welfare. The focus was on expansion of services through Medicaid that supports living and working in their community. ICBVI has been able to provide significant input to ensure that the two programs complement each other and support successful employment services and outcomes.

The Commission has also strengthened our collaboration with the Idaho Educational School for the Deaf and Blind, and now serve an increasing number of students with developmental disabilities. These individuals are served by both the general and blind programs, resulting in a more robust model of service delivery for these individuals with the most significant disabilities.

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

Under a memorandum of understanding, ICBVI and IDVR agree to collaborate on all cases in who meet ICBVI eligibility criteria and who also have secondary severe and persistent mental health diagnosis.

This team approach is used to ensure that the Idahoans served by this agreement will benefit as to remaining de-institutionalized and successfully integrated into their respective communities from a psychological, psychosocial, and employment perspective. Those client's who have a severe and persistent mental illness deemed not eligible for the H&W-Behavioral Health program will be provided necessary VR services through ICBVI and IDVR.

ICBVI leverages the relationship with IDVR in the provision of services to individuals who are blind and visually impaired and who have significant mental health challenges. In the past two years, IDVR has represented the Title IV programs on the State Planning Council on Behavioral Health. The purpose of this Council is to "serve as an advocate for adults with serious mental issues, children with severe emotional disturbances, and others with mental health or substance use needs. Expand, improve, notify or transform Behavioral Health service delivery system for individuals with severe mental illness, serious emotional disturbance, and substance use

disorders to ensure access to treatment, prevention, and rehabilitation services, including those services that go beyond the traditional behavioral health system.

The partnership has resulted in program participants experiencing more rapid engagement in the program, a broader scope of wrap around services, and leading to more opportunities for competitive integrated employment.

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

1. SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS

I. THE NUMBER OF PERSONNEL WHO ARE EMPLOYED BY THE STATE AGENCY IN THE PROVISION OF VR SERVICES IN RELATION TO THE NUMBER OF INDIVIDUALS SERVED, BROKEN DOWN BY PERSONNEL CATEGORY;

In PY 2020, 333 participants were served in the VR program through 38 ICBVI staff. Personnel categories are broken down in the next section (ii).

In PY 2021, the following number of participants were served by the 38 ICBVI staff, broken down by quarter:

- Q1 - 333 participants
- Q2 - 342 participants
- Q3 - 369 participants

II. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

ICBVI currently employs a total of 38 staff necessary to provide VR services. The breakdown of personnel is as follows:

Professional Staff:

- 1 Administrator
- 1 Rehabilitation Services Chief
- 4 Program Managers
- 6 Senior VR Counselors for the Blind*
- 14 Instructors for the Blind (includes the State Wide Assistive Technologist / Business Services Coordinator)
- 1 Project Coordinator for Transition Services.

Administrative staff:

- 1 IT Technology Senior
- 2 Fiscal Technician
- 5 Vocational Rehabilitation Assistants

- 1 Management Assistant
- 1 BEP specialist
- 1 Receptionist

* Requirements for Senior VR Counselor for the Blind are consistent with the national standard of CRC. Individuals who do not meet those standards are designated Counselor for the Blind. All counselors currently employed at ICBVI are designated Senior Counselor of the Blind.

III. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES IN 5 YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.

ICBVI anticipates its current number of staff (38) will be required to provide VR services, based upon projections.

Additionally, ICBVI projects 4 staff retiring in the next 5 years:

Professional- Rehabilitation Services Chief (1), Vocational Rehabilitation Counselor (2),

Administrative - Financial Technician (1).

B. PERSONNEL DEVELOPMENT

I. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM;

Idaho State University was approved by the Idaho SBOE in November 2019 to begin a new Masters of Counseling specialty program: Clinical Rehabilitation Counseling. This program began fall of 2020 and is offered in two Idaho locations (Meridian and Pocatello). The program has the ability serve 24 full-time students.

II. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

The University of Idaho is expecting 19 graduates in 2020 and no further students will graduate as the program is ending.

III. THE NUMBER OF STUDENTS WHO GRADUATED DURING THE PRIOR YEAR FROM EACH OF THOSE INSTITUTIONS WITH CERTIFICATION OR LICENSURE, OR WITH THE CREDENTIALS FOR CERTIFICATION OR LICENSURE, BROKEN DOWN BY THE PERSONNEL CATEGORY FOR WHICH THEY HAVE RECEIVED, OR HAVE THE CREDENTIALS TO RECEIVE, CERTIFICATION OR LICENSURE.

The Idaho State University Program has not graduated any students in their first cohort yet.

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

ICBVI plans for recruitment will be to continue to recruit qualified staff from the Idaho State University and at other regional and national institutions of higher education. We maintain contact with Western Washington University, Utah State University, Portland State University, Western Oregon University, University of Wisconsin-Stout, University of Northern Colorado and Montana State University, all of which have Master's programs in Rehabilitation Counseling.

ICBVI also uses the following for recruitment of Senior VR Counselors and Senior Instructors for the Blind:

- Commission on Rehabilitation Counselor Certification (CRCC)

- The Association for Education and Rehabilitation of the Blind and Visually Impaired (AER) website
- The internet as utilized by the Idaho Division of Human Resources
- Internships and practicums completed by students with ICBVI
- Personal contact with instructors in university programs
- National Federation of the Blind (NFB) website
- CSAVR and NCSAB
- Region X Coalition

ICBVI has provided practicums and internships for Master's level students in the Rehabilitation Counseling program over the last five years and anticipates that it will provide an additional one to three practicums or internships in the next two years.

Training and continuing education is provided to VR staff from a variety of venues:

- National Rehabilitation Association (state and national conferences)
- The Association for Education and Rehabilitation of the Blind and Visually Impaired (AER)
- Helen Keller National Institute
- State and regional conferences and workshops
- Collaborative trainings with IDVR
- Technical Assistance Centers (e.g. WITAC, YTAC)
- Annual in-service training
- Webinar based trainings

Presently, we employ 17 individuals with a disability, 12 of whom are blind or visually impaired and 2 individuals are from a minority background.

ICBVI participates in Career Fairs around the state to encourage and seek out individuals from diverse backgrounds including individuals with disabilities and from minority backgrounds.

ICBVI salaries compare favorably with the surrounding states in the Pacific Northwest. The agency also encourages and supports, costs, training/education time of staff and formal education and certification for staff.

ICBVI hires any person into a permanent position from a temporary position if they have met the minimum standards for that position as determined by the State of Idaho's Department of Human Resources for that classified position.

3. PERSONNEL STANDARDS

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

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;

The State of Idaho does not require a state licensure for rehabilitation counselors. Educational standards for personnel established by ICBVI for qualified rehabilitation professionals (QRP) are intended to meet a base level of quality expected of the counselors by the Commission.

ICBVI's minimum standards for Senior VR Counselor for the Blind are consistent with the national standard of CRC. ICBVI places great importance on recruiting, hiring and retraining staff that are appropriately and adequately trained to provide services to our blind and visually impaired clients. We currently have eight staff with CRC certification, including the Chief of Rehabilitation Services. In addition, we have 14 Instructors for the Blind and six of them have Master's degrees and/or AER Certification in Rehabilitation Teaching or Orientation and Mobility.

ICBVI tracks and monitors each employee's individual training and development. Special emphasis is placed on training required to maintain CRC or AER certification. This includes training on disability topics, vocational counseling, ethics, case management, assessment, job placement strategies and especially assistive technology for the blind and visually impaired. Specific development needs identified for each employee are addressed during annual performance evaluations. While specific priorities evolve year-to-year, ICBVI consistently addresses WIOA, data collection and reporting, assessment, counseling and guidance, vocational planning, job placement, as well as assistive and rehabilitation technology.

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.

ICBVI is committed to providing all employees with development opportunities which will enhance employee job performance; support the agency's mission, values and goals; and lead to successful employment outcomes for individuals with disabilities. With emphasis on workforce development, ICBVI will also concentrate on providing training to strengthen business relationships and increase knowledge of labor market relevance and employer needs.

Through an increased emphasis on data-driven decisions, ICBVI will increase utilization of the most recently available labor marked information to promote more informed decision making on the part of client's when selecting potential employment options.

In order for staff to have a 21st century understanding of the evolving labor force and needs of individuals with disabilities, ICBVI is committed to providing training and support in the following:

- Idaho Labor Market Information
- The Career Index Plus
- Career Pathways

4. STAFF DEVELOPMENT

A. A SYSTEM OF STAFF DEVELOPMENT FOR PROFESSIONALS AND PARAPROFESSIONALS WITHIN THE DESIGNATED STATE UNIT, PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

Specific areas of training that are emphasized are:

- The Rehabilitation Act and its regulations, as amended by WIOA;
- The Workforce Innovation and Opportunity Act (WIOA)

- Social Security Work Incentives and Employment;
- Transition planning for students with blindness and visual impairment;
- Continuing education on the medical aspects of vision related disabilities; and
- Assistive Technology for the blind and visually impaired.

All agency personnel have an annual evaluation of his or her performance, goals and plans. It is during this process that ICBVI assesses how training has impacted an employee's ability to perform the essential functions of his or her position, and to set new goals and priorities for the next year.

B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.

Succession planning and leadership development are discussed and emphasized to assist staff to enhance current skills or to build their skills for future opportunities for advancement within the agency. ICBVI has a policy to promote from within, which gives opportunities for current employees to advance and remain with the agency.

ICBVI continues to look for opportunities to collaborate on training and staff development with the Department of Education and the schools. ICBVl coordinates its CSPD activities with those provided under IDEA. ICBVI currently participates in:

- The Idaho Interagency Council on Secondary Transition;
- The Transition Institute;
- Tools for Life Conference;
- Independent Living Conference;
- Training and conferences provided by the Association for the Education and Rehabilitation for the Blind and Visually Impaired (AER);and
- Collaborative training with the Idaho Educational Services for the Deaf and Blind.

ICBVI will continue to work closely with the Idaho Educational Services for the Deaf and Blind addressing the needs of the transition population of the blind or visually impaired.

Throughout the year, training requests are approved for individual and group training in areas of interest or need. A variety of platforms are utilized for dissemination, including face-to-face training, conferences, and online webinars.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

ICBVI employees that are fluent in Spanish are recruited to serve the needs of the Hispanic communities located throughout the state.

ICBVI has chosen to purchase sign language interpreting services for individuals who are deaf. In cases where the client is deaf and blind, ICBVI will often work collaboratively with the general VR agency and the Helen Keller's national and regional centers to provide services. If ICBVI has a client who is monolingual speaking an interpreter will be hired by the agency.

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

ICBVI VR counselors, under the direction and supervision of the Rehabilitation Services Chief, will facilitate the required coordination with the State Department of Education and provision of Pre-employment Transition Services, as required under WIOA.

The Transition Coordinator will facilitate the required coordination with the State Department of Education and provision of Pre-employment Transition Services, as required under WIOA.

Training and education will be identified for staff regarding service provision, coordination, and best practices in serving students with disabilities. The Transition Coordinator is assigned as an active member of the Idaho Interagency Council on Secondary Transition and the Special Education Advisory Panel, which promotes interagency cooperative planning, information sharing, and the collaborative use of resources at the state and local level. This Council works to ensure that training needs are adequately identified and then addressed through shared training opportunities.

Training opportunities offered by ICBVI which are relevant to both educators and vocational rehabilitation professionals will be opened to school staff for participation when practicable. For example, every fall, ICBVI in collaboration with IDVR, IESDB and the State Department of Education host a conference (Transition Institute). This conference is attended by educators, VR staff, and other agencies and individuals who service transition age youth. The Transition Coordinator also frequently attends Management Team meetings to share progress and development of pre-employment transition services .

VR counselors throughout the state will serve on regional Special Education and Transition Boards and Councils.

J. STATEWIDE ASSESSMENT

1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

ICBVI completed a Comprehensive Statewide Needs Assessment (CSNA) in FFY 2020 in accordance with the requirements of Section 101.15 of the Rehabilitation Act as amended. Three separate surveys were developed to thoroughly assess the needs of Idahoans who are blind or visually impaired. The survey participants included a sample of VR clients (*n* = ICBVI clients served within the time frame October 1, 2018 through September 30, 2019), all ICBVI staff, and a sample of employers and other key informants.

According to 2017 ACS estimates, 2.9% of the population reported a visual disability in Idaho, which is a higher than the percentage reported in the U.S (2.3%). It should be noted that the population reporting a visual disability in Idaho increased from 2.3% in 2015 to 2.9% in 2017. The percentage of individuals living in Idaho with a visual disability ages 18-34 (1.31%) is slightly higher than the US population (1.13%)

According to the results of the 2020 CSNA, the most common themes that emerged in the area of rehabilitation needs of blind and visually impaired individuals in the state were:

- 32% of all respondents (clients and key informants) identified lack of transportation as the major barrier to employment for individuals who are blind or low vision in Idaho.
- 55% of all key informants interviewed(agencies that provide services to individuals who are blind and visually impaired) reported that societal attitudes, family attitudes, and employer attitudes regarding individuals who are blind or low vision continues to be a major barrier in Idaho.

- 28% of client's surveyed reported independent living and mobility skills are seen as a major need.
- 16% of client's surveyed reported access to career services, education and employment training programs as a significant need.

While the 2020 CSNA does not specifically assess the needs of supported employment (SE) services for the blind and visually impaired, ICBVI does serve individuals other disabilities that require SE supports and services. In the past two years, ICBVI has serviced 16 individuals who require SE services. This number has been increasing every year since 2016. Historically this has been an underserved population by ICBVI. However, since the passage of WIOA, the Commission has worked collaboratively with IESDB to ensure these individuals are made known to the VR program. Since the Idaho Division of Vocational Rehabilitation manages the SE program for the state, individuals who require SE services are required to apply for services at the Division. The Commission is responsible for providing all of the services and supports to address the visual disability, and IDVR provides the necessary employment services, and services required to address the other physical or mental disabilities. All other VR services are negotiated between the two programs.

B. WHO ARE MINORITIES;

According to the results of the 2020 CSNA, individuals who are blind or low vision and also Hispanic or Native American may be underserved by ICBVI. The existing data indicated a low percent of Hispanic cases served by ICBVI in relation to the percent of the population with any disability in the Hispanic category.

The prevalence by race/ethnicity and vision disability in Idaho and the U.S. are based on 2017 ACS estimates. The prevalence of vision disability for Idahoans is higher than the U.S. in two categories, white and other. The prevalence of vision disability for White Idahoans (2.9%) is higher than in the U.S. (2.4%). The prevalence of vision disability for Idahoans who identify as Other (4.0%) is higher than in the U.S (1.5%). The percentage of Idahoans who identify as Hispanics with vision disability is the same (2.1%) than the percentage of Hispanics with a vision disability in the US.

Idaho's demographics are changing. Idaho was the second fastest growing state relative to population in the past 10 years, with the population growing over 17 percent in the decade (US Census Bureau, 2020). Idaho was the fastest growing state by percentage in 2021, growing 2.9 percent and was ninth in total numeric growth at 53,151. While Idaho is traditionally a major state for resettlement, international migration has slowed significantly under the COVID-19 pandemic. Regardless of these conditions, ICBVI remains committed to refugee outreach efforts. To best understand the needs of this population, ICBVI conducts joint staff training in conjunction with the Agency for New Americans, and maintains regular contact and outreach with staff at the International Rescue Committee refugee organization and all three resettlement agencies in the Treasure Valley and Magic Valley regions.

ICBVI also conducts ongoing outreach activities to meet the needs of the Spanish speaking population statewide. A number of these individuals engage in migrant seasonal farm work. The Commission works collaboratively with the DOL, the Community Council of Idaho (a rural-centered, nonprofit serving Latinos in Idaho, and the Idaho Division of Hispanic Affairs) to identify these individuals and processes to best conduct outreach activities.

ICBVI conducts various outreach activities to identify and involve individuals with disabilities from underserved backgrounds. These include but are not limited to:

- Engagement with institutions of higher education;
- Outreach activities to small businesses who are owned by minorities;

- Outreach to medical providers who serve refugee and immigrant populations.

ICBVI also conducts tribal outreach, per our MOU, to the four tribes located in Idaho and the substantial American Indian population residing in the Treasure Valley.

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

The WIOA Advisory Group has specifically identified rural service provision a traditionally underserved area to address in II.c.1 of this plan.

According to the results of the 2020 CSNA, almost all participants surveyed commented on the rural nature of Idaho and the difficulty in providing services with limited financial and staff resources. Along this theme the lack of information in rural areas about ICBVI was also noted.

Other common themes that emerged from the CSNA:

- Individuals living in rural areas, with less access to services, support, training and education, are underserved.
- Language and culture are barriers to certain populations accessing services or seeking employment, including a growing refugee population in parts of Idaho. In-person translation services are not readily available.
- Native American tribes live in isolated locales in Idaho with limited employment options.
- ICBVI has increased outreach efforts and coordination with partner agencies; however, there is a continued need for outreach to potentially unserved populations. The COVID-19 pandemic had a significant negative impact on our outreach activities.
- Access to assistive technology, including internet was identified as a significant barrier. This was especially illuminated during the pandemic; especially for individuals living in rural communities.

The Commission has identified addressing language and cultural barriers as a priority, considering the diversity index in Idaho has increased from 54.9% in 2010 to 61.1% in 2020 (U.S. Census Bureau). Strategies include:

- Outreach to resettlement centers in Idaho (Boise and Twin Falls predominantly)
- Outreach to those agencies that serve refugee and migrant populations
- Strengthen partnerships in the workforce development system to reach these underserved and unserved individuals in the state.
- Utilize telephone-based or internet based translation services (when in person are not available) to bridge language barriers presented by Idaho's growing refugee population.

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

ICBVI recognizes the need to increase partnerships with the statewide workforce system to develop innovative programs to serve co-enrolled individuals. ICBVI staff and counselors are committed to providing ongoing training of One Stop Center staff on issues related to blindness and visual impairments. Other strategies include continuing to expand partnerships and encourage coordination of services, developing of new ways to provide for job creation or to

provide incentives to employers, and to work cooperatively to remove barriers and stigmas in the workplace.

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

According to the 2020 CSNA, the most common themes that emerged in this area are:

- Collaboration with Local Education Agencies (LEA) / school districts needs to increase.
- Transition-age youth need more engagement in the workforce.
- Increase collaboration with WIOA partners to develop internships and other work based learning activities.
- There is lack of information regarding ICBVI services and opportunities.

The COVID-19 pandemic presented significant challenges in the delivery of pre-employment transitions services, specifically in the provision of work based learning experiences. The vast majority of Pre-ETS over the past two years have been provided via video conferencing technologies. To help address this, rehabilitation technology, including internet service, were substantial services in the individualized plan for employment for participants (especially those in rural communities) who required these supports.

Strategies to increase opportunities for work based learning experiences for the duration of this plan include:

- Increase engagement activities with employers. To accomplish this, the Commission's Business Engagement Coordinator will be spending more time with the counselors in all regions to develop work based learning opportunities.
- Increased engagement with regional LEA's and SPED directors. The Commission's Transition Coordinator will be focusing more of her time on meeting with educators during her visits to the regional offices.
- Counselor participation in their regional One Stop's.
- Counselor participation in their regional Transition Councils.

In addition, ICBVI is also addressing the needs of students and youth with disabilities through the following:

- ICBVI is implementing changes in the delivery of pre-employment transition services. The Commission has begun to take a tiered or scaffolded approach to program development that will enhance the delivery of pre-employment transition services to students with disabilities. This educational approach is not uncommon in our public school systems, where programs build upon each other to reinforce skill building and knowledge.
- ICBVI has enhanced outreach efforts to students and youth with disabilities that are not traditionally known to the Commission through collaboration with special education services. ICBVI has increased outreach to mainstream educators, especially 504 coordinators.
- ICBVI continues to focus outreach to parents and families of youth with disabilities, community rehabilitation programs, educators, and other youth servicing agencies. One of the most significant vehicles ICBVI uses to achieve this goal is for our Assessment and Training Center staff to travel around the state to conduct seminars on blindness and

visual impairments. Regional staff promote the regional seminars to those unserved and underserved communities.

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

According to the 2020 CSNA, there is a need to improve the collaboration with CRP's in job training and placement services in the state for ICBVI clients.

To accomplish this, ICBVI will:

- Commit to annually reviewing CRP cooperative agreements and collaboratively identify areas for service improvement;
- Commit to providing training and support with CRP's to help them increase their capacity to provide all employment services, including Pre-Employment Transition Services (Pre-ETS).
- Continue to provide CRP's training in blind skills, and how to work with individuals who are blind or visually impaired. This has been a huge success, and ICBVI is committed to continue doing this in all of the regions across the state as a part of this state plan.

2022 Update:

- In PY20, ICBVI revised the CRP MOU to include significant details around the provision of pre-employment transition services. Work based learning experiences and coaching services were a special area of emphasis. MOU's were reviewed with all participating CRP's via regional trainings.
- In PY 2021, ICBVI began intensive technical assistance with the WINTAC-QE (University of Wisconsin-Madison) in the area of business engagement. Two CRP's in the state agreed to participate in this training. ICBVI anticipates strengthening the partnership with these two CRP's, and ultimately improving competitive integrated employment outcomes for participants served by these programs.
- After a COVID-19 hiatus, ICBVI will resume it's state wide blindness seminars in PY 2022 in which regional CRP's are always invited to these events.

3. INCLUDE AN ASSESSMENT OF THE NEEDS OF INDIVIDUALS WITH DISABILITIES FOR TRANSITION CAREER SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES, AND THE EXTENT TO WHICH SUCH SERVICES ARE COORDINATED WITH TRANSITION SERVICES PROVIDED UNDER THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT

Current (2020) data from the Idaho Educational School for the Deaf and Blind (IESDB) reveals that there are 111 students identified in Idaho who are blind or visually impaired (this number does not account for home schooled youth).

According to the 2020 CSNA, the most common themes that emerged in the needs of students include:

- Improve access to assistive technology and training.
- Supports for transition from high school to college.
- Independent living skills training.
- More work-based learning experiences.

Recommendations to improve Transition Services include:

- Provide multiple and a broad variety of work-based learning experiences.
- Increased cross-training and collaboration between agencies and organizations.
- Improve marketing efforts of ICBVI transition services.
- Engage students at a younger age.

To address these needs, the ICBVI Project Coordinator for Transition Services is collaborating with Local Education Agencies (LEAs) in all five administrative regions. This collaboration includes an assessment to determine what transition services were currently being provided by the LEA, and to determine the need for additional pre-employment transition services. The Transition Project Coordinator also provides technical assistance regarding service changes as a result of WIOA.

Using information provided by the LEAs and Regional ICBVI staff, the Project Coordinator for Transition Services will continue to develop statewide programs founded on the evidence-based practices that are aligned to the five authorized Pre-ETS categories. The Transition Project Coordinator also collaborates with LEAs, institutions of higher education, state and federal programs serving students, and employers to enhance pre-employment transition services provided around the state.

The Project Coordinator for Transition Services is also employing marketing strategies and developing materials to reach students and youth in transition and school district personnel to inform parents, educators, administrators, and others about the ICBVI Vocational Rehabilitation program.

ICBVI / IDVR and the SDE have developed a comprehensive formal interagency agreement which addresses collaborative service provision. In addition, ICBVI participates in the planning and coordination of an annual Transition Institute for VR program staff and educators across the state.

The current CSNA clearly articulates the need for both the required and authorized Pre-ETS activities. In responses to this, ICBVI has completed its fiscal forecasting for Pre-ETS, and it is included in the 2020 CSNA. ICVBI will review this forecasting on an annual basis.

PY 2022 Update:

In PY 2021, ICBVI started a Community of Practice that is led by the Commission's Transition Coordinator. Members of this community include: ICBVI counselors, Rehabilitation Teachers, and all statewide IESDB Teachers of the Visually Impaired (TVI's). The purpose of this COP is to identify unserved or underserved students who are blind or visually impaired, as well as improving transition services (including Pre-ETS) for students with disabilities who are blind or visually impaired.

Due to the pandemic, ICBVI experienced a significant decrease in the provision of work based learning experiences. Since most pre-employment transition services were delivered remotely, the Commission expanded the delivery of the other four required activities.

ICBVI is resuming it's 3 residential programs in the summer of 2022 help at Boise State University: Work Readiness Camp (14-15 year old's), College Days, and the Summer Work Experience Program (SWEP). The Commission has blended the College Days and SWEP into one program, and now offers participants to take a college level course while participating in a work based learning experience.

ICBVI continues to re-asses the needs of students with disabilities coming out of the COVID 19 pandemic. Resuming in-person learning opportunities has been communicated as a high priority from students, parents, and educators.

K. ANNUAL ESTIMATES

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

Population Estimates: Idahoans with Blindness and Visual Impairments (Source: American Community Survey C18120 Employment Status by Disability Status)

Idahoans w/ disabilities in workforce in workforce			**Idahoans w/visual impairment**
Year Forecast	***Census Estimate***	***Forecast [1]***	***Census Estimate [2]***
ACS 2017	59,059		1,417
ACS 2018	56,306		1,351
ACS 2019	58,424		1,402
ACS 2020	57,396		1,378
2022		58,665	1,408
2023		59,310	1,423

[1]Source: Idaho Department of Labor - Population growth projected through 2029 (1.1% annually).

[2]Update from ACS 2020 S1810 suggests 2.4% of the disability population in Idaho have a visual disability.

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

A. THE VR PROGRAM;

The number of clients served in the VR program took a sharp downturn in early 2020 due to factors related to the pandemic. However, in 2022, numbers of new referrals are beginning to rebound. Our forecast has been adjusted in this PY 2022 State plan modification:

In FFY 2022, Title I, Part B the number of eligible individuals is estimated to be 380

In FFY 2023, Title I, Part B the number of eligible individuals is estimated to be 400

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

The Supported Employment (SE) is managed by the Idaho Division of Vocational Rehabilitation. ICBVI no longer receives Title VI funds for the SE program. However, ICBVI does continue to serve all eligible SE clients, including students with disabilities, utilizing Title I funds.

In FFY 2020, ICBVI provided supported employment services to a total of 11participants (3 youth with the most significant disabilities and 8 adults with the most significant disabilities). In FFY 2021, ICBVI provided supported employment services to a total of 16 participants (8 youth with the most significant disabilities and 8 adults with the most significant disabilities).

As required under state agreement, these participants were co-enrolled with the Idaho Division of Vocational Rehabilitation (IDVR).

ICVBI anticipates providing supported employment services to the following over the next 2 years:

FFY 2022

- 8 adults with the most significant disabilities
- 8 youth with the most significant disabilities (including extended services).

FFY 2023

- 8 adults with the most significant disabilities
- 10 youth with the most significant disabilities (including extended services).

The SE projections are included in the section k2A and k4 projections.

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

ICBVI is not operating under an Order of Selection. The Commission will continue to monitor fiscal conditions as impacted by WIOA to determine whether or not an Order should be established and/or implemented. ICBVI currently operates a three-tier significance of disability (MSD, SD, D).

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

ICBVI is not operating under an Order of Selection.

4. THE COST OF SERVICES FOR THE NUMBER OF INDIVIDUALS ESTIMATED TO BE ELIGIBLE FOR SERVICES. IF UNDER AN ORDER OF SELECTION, IDENTIFY THE COST OF SERVICES FOR EACH PRIORITY CATEGORY.

• Title I Part B $655,000

• Title VI Part B $0

Estimated costs of services, per individual:

FFY 2022 – ICBVI projects serving 380 individuals with an estimated cost of $1724 per individual.

FFY 2023 – ICBVI projects serving 400 individuals with an estimated cost of $1638 per individual.

The COVID-19 pandemic has significantly impacted the VR program. ICBVI experienced a significant decrease in participants and had to alter the manner in which services were provided. The pandemic also had a significant impact on the spending of the 15% reserve for Pre-Employment Transition Services. While ICBVI is beginning to experience an increase in applicants to the program in PY 2022, the longer-term impacts that the pandemic had on the 15% spending requirement is unknown at this time.

ICBVI believes it will be difficult to determine the long-term impact of WIOA on number served without baseline data. While the Commission is committed to extending services to all eligible individuals, the emphasis and spending requirements associated with Pre-ETS requirements

will both; (1) diminish overall funds available to individuals categorized as 'eligible' and, (2) fundamentally shifts the way ICBVI spends 15% of program funds.

L. STATE GOALS AND PRIORITIES

1. IDENTIFY IF THE GOALS AND PRIORITIES WERE JOINTLY DEVELOPED AND AGREED TO BY THE STATE VR AGENCY AND THE STATE REHABILITATION COUNCIL, IF THE STATE HAS A COUNCIL, AND JOINTLY AGREED TO ANY REVISIONS

ICBVI management team revised/modified the goals and priorities based on the recently completed Comprehensive Statewide Needs Assessment (CSNA). New program goals and priorities reflect and align with program changes resulting from WIOA, the results from the latest CSNA, and the goals and strategies of the combined state plan.

ICBVI will continue to develop specific strategies that are in alignment with these goals and priorities.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS

The Commission's goals and priorities were informed via the 2020 CSNA conducted by the University of Washington. The goals and priorities were developed through discussions with the ICBVI Board of Commissioners and through collaboration among WIOA core partner programs. As well, program goals and priorities are identified through the Commission's Strategic Plan (2020-2023).

The 2020 CSNA solicited input from a diverse body of stakeholders, including client's (both current and exited), ICBVI staff, ICBVI Board of Commissioners, employers, CRP's, education officials, consumer groups, and other key stakeholders.

The following goals are based on the recommendations from the Statewide Comprehensive Needs Assessment completed in 2020 with priorities developed for PY 2020—2023 period; based upon input from a broad spectrum of stakeholders including clients, ICBVI staff and other key informants.

The COVID-19 pandemic did not change the goals and priorities of the VR program.

Goal 1: Increase independence and employment outcomes through quality rehabilitation services.

- Priority 1: Provide quality independent living skills training;
- Priority 2: Improve access to job training and placement services;
- Priority 3: Provide outreach training to all community partners; and
- Priority 4: Improve services to business across the state.

The Commission is still developing metrics to evaluate performance for this goal.

Goal 2: Reduce barriers to employment for individuals who are blind or visually impaired.

- Priority 1: Continued education and training to employers, educators, and community partners;
- Priority 2: Continue to address transportation issues that face ICBVI clients through our efforts in the One-Stop system;
- Priority 3: Continue to address accessibility issues within the One-Stop system;
- Priority 4: Increase/improve access to assistive technology and training; and

- Priority 5: Increase outreach activities to rural communities.

The Commission is still developing metrics to evaluate performance for this goal. To help address this goal, ICBVI, along with all other WIOA core partners, are going to be presenting at the Idaho Juvenile Justice Association Conference. The goal of this activity will be to inform juvenile justice professionals (along with other agencies who serve this population) on the One Stop System and opportunities for both youth and their families under WIOA.

Goal 3: Improve transition services for students

- Priority 1: Increase work-based learning experiences for students prior to exiting high school;
- Priority 2: Engage work force partners in the development and provision of Pre-Employment Transition Services; and
- Priority 3: Continue emphasizing training and education of key stakeholders on ICBVI programs and services, with emphasis on Pre-ETS.

The Commission is still developing metrics to evaluate performance for this goal.

Goal 4: Improve VR program efficiency through continuous quality improvement activities

- Priority 1: Revise ICBVI's program satisfaction survey(s) to identify areas for program improvement;
- Priority 2: Continue to improve the internal case review process to align with WIOA requirements and inform the continuous quality improvement cycle; and
- Priority 3: Continue to develop policies, procedures, and internal controls to ensure accuracy and validity of program performance reporting.

PY 2022 update on evaluation of goal 4:

- Priority 1: In PY2021, ICBVI revised the satisfaction survey. The satisfaction rate for all surveys competed was 100%.
- Priority 2: ICBVI has formalized a case file review protocol. With that, the case file review(s) have been revised to include targeted audits around specific elements of the program.
- Priority 3: ICBVI revised the VR Policy manual, and was was approved by the Board of Commissioners in May 2022. In January 2022, ICBVI implemented a new data validation policy manual for the RSA 911. In addition, ICBVI has quarterly meetings with IDVR to discuss issues specific to RSA 911 data and reporting.

3. ENSURE THAT THE GOALS AND PRIORITIES ARE BASED ON AN ANALYSIS OF THE FOLLOWING AREAS:

A. THE MOST RECENT COMPREHENSIVE STATEWIDE ASSESSMENT, INCLUDING ANY UPDATES;

The following goals are based on the recommendations from the Statewide Comprehensive Needs Assessment completed in 2020 with priorities developed for PY 2020—2023 period; based upon input from a broad spectrum of stakeholders including clients, ICBVI staff and other key informants.

The COVID-19 pandemic did not change the goals and priorities of the VR program.

Goal 1: Increase independence and employment outcomes through quality rehabilitation services.

- Priority 1: Provide quality independent living skills training;
- Priority 2: Improve access to job training and placement services;
- Priority 3: Provide outreach training to all community partners; and
- Priority 4: Improve services to business across the state.

Goal 2: Reduce barriers to employment for individuals who are blind or visually impaired.

- Priority 1: Continued education and training to employers, educators, and community partners;
- Priority 2: Continue to address transportation issues that face ICBVI clients through our efforts in the One-Stop system;
- Priority 3: Continue to address accessibility issues within the One-Stop system;
- Priority 4: Increase/improve access to assistive technology and training; and
- Priority 5: Increase outreach activities to rural communities.

Goal 3: Improve transition services for students

- Priority 1: Increase work-based learning experiences for students prior to exiting high school;
- Priority 2: Engage work force partners in the development and provision of Pre-Employment Transition Services; and
- Priority 3: Continue emphasizing training and education of key stakeholders on ICBVI programs and services, with emphasis on Pre-ETS.

Goal 4: Improve VR program efficiency through continuous quality improvement activities

- Priority 1: Revise ICBVI's program satisfaction survey(s) to identify areas for program improvement;
- Priority 2: Continue to improve the internal case review process to align with WIOA requirements and inform the continuous quality improvement cycle; and
- Priority 3: Continue to develop policies, procedures, and internal controls to ensure accuracy and validity of program performance reporting.

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

ICBVI began reporting Measurable Skill Gains data in PY 20. The state VR program exceeded the negotiated target of 38.5%. The negotiated target for PY 21 is 41%.

The following performance measures are scheduled to be negotiated in PY 21.:

- Employment in the 2nd quarter after exit
- Employment in the 4th quarter after exit
- Median earnings 2nd quarter
- Credential attainment

A timeline for the following performance measure has not yet been established:

- Effectiveness in serving employers

The Commission has updated our data sharing agreement, including signing the State Wage Interchange System (SWIS) Agreement. While, ICBVI has requested access to Idaho's Data Management Council to gain access to Idaho's Statewide Longitudinal Data System, the current data exchange environment does not allow for this information to be exchanged in time for reporting purposes. The Commission is working closely with other core WIOA partners on a Workforce Development Quality Initiative (WDQI) grant which seeks to remove barriers through automation and reduce the time required to access this data.

In PY 2021, the Commission implemented a data validation framework and policy which provides strong internal control and quarterly data checks to detect anomalies and errors.

The Commission will continue to collect and analyze data to inform initial baseline thresholds to establish levels of performance to use for future negotiations with RSA.

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

The Commission has worked closely with RSA on their data dashboard information and utilizes the dashboard to identify and fix inaccuracies in the data collection process and for performance improvement.

ICBVI's last monitoring report was conducted in 2010. The issues identified in this report were addressed and bear no relationship to the goals and priorities identified in this plan outside of the Commission continuing to expand its continuous improvement activities.

M. ORDER OF SELECTION

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES

ICBVI is currently not operating under an Order of Selection. However, the impact of WIOA and the 15% reserve requirement on the ability to serve all client's remains unknown for the future.

B. THE JUSTIFICATION FOR THE ORDER

n/a

C. THE SERVICE AND OUTCOME GOALS

n/a

D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER; AND

n/a

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

n/a

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT

ICBVI currently is able to serve all eligible clients.

N. GOALS AND PLANS FOR DISTRIBUTION OF TITLE VI FUNDS

1. SPECIFY THE STATE'S GOALS AND PRIORITIES FOR FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

In PY2018, under agreement with the Idaho Division of Vocational Rehabilitation (IDVR), ICBVI no longer receives any Title VI funds, as IDVR has agreed to manage the SE program for the state.

If needed, the Commission will continue to provide SE services under general Title I funds.

Under a cooperative agreement, IDVR administers the supported employment for the state. All participants who have a SE goal are referred to IDVR services. Under this agreement, IDVR provides all employment services (CRP services) and ICBVI provides all services to address visual impairments and blindness. All other services required for the participant are negotiated between the two agencies.

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

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

The Idaho Division of Vocational Rehabilitation (IDVR) manages the supported employment program for the state.

ICBVI has collaborated with IDVR on policies and procedures to ensure that extended services are available for youth with the most significant disabilities for up to 4 years, or until the individual turns 25 and no longer meets the definition "youth with a disability." Extended services can be provided following the achievement of employment stability when comparable external sources of long-term extended support are unavailable. ICBVI will support extended services with Title I funds, as needed, and will continue to leverage other sources of extended services.

B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

Under a cooperative agreement, ICBVI shares supported employment cases with IDVR. In addition, ICBVI has and will continue to support clients that require supported employment services through the basic support grant during program participation, and work with community partners, families, and other organizations to develop long term support or natural supports whenever feasible.

O. STATE'S STRATEGIES

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES

The following strategies will be utilized to address the rehabilitation needs of blind and visually impaired in the state, as identified in the 2020 CSNA:

- Lack of transportation – Due to the rural nature of Idaho, transportation always emerges as a major barrier for individuals. To address this, ICBVI counselors and rehabilitation teachers will increase outreach activities to rural communities. As well, the Assessment

and Training Center staff will continue their project of "mobile workshops" in regions across the state. ICBVI regional staff will continue to serve on public transportation boards and commissions that address transportation issues and projects.

- Societal attitudes – Outreach and education will include the "mobile workshops" conducted by our Assessment and Training staff. CRP's, employers, educators, families are all invited to these regional workshops. ICBVI recently appointed the statewide AT Specialist also serve as a statewide business engagement specialist. A strategy of this individual to increase outreach and training to employers. These mobile workshops were discontinued in PY 20 due to the COVID-19 pandemic but are anticipated to resume in PY 22.

- Independent Living Skills-To address the continuing need of independent living skills training, ICBVI will ensure that rehabilitation teachers are provided opportunities for blind skills training. The VR program recently increased assessment activities for all eligible individuals to ensure all training needs are identified and provided in the IPE. Direct services by the regional Instructors for the Blind and our Assessment and Training Center were significantly limited during the pandemic. However, these activities resumed in PY20 as CDC and state guidance allowed.

Access to career services and training programs – To address this, ICBVI has been working with all WIOA core programs to continue the development of the One-Stop System. As part of One-Stop strategy, ICBVI will also be emphasizing staff participation in all comprehensive and affiliate centers. Participation will include training of One Stop center staff and developing opportunities for co-locating. Additionally, ss part of our personal development strategies, staff trainings on Career Pathways, Labor Market Index, and Career Index Plus are all geared to ensuring staff have a 21st century understanding of the labor force and training programs.

2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS

ICBVI will continue to:

- Conduct assessments of blindness skills on all VR clients to determine their level of competence with the alternative skills of blindness;

- Continue implementing training curricula and timelines for clients to learn how to best utilize their Assistive Technology devices;

- Utilize loaner system and increase the number of models of adaptive technology for clients to try out before we purchase items;

- Maintain comprehensive Assistive Technology supports and training through our Assessment and Training Center, Statewide Assistive Technologist and regional Rehabilitation Teachers.

3. THE OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS WELL AS THOSE WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM

Tribal VR (Nez Perce Tribe, Coeur d'Alene Tribe, Shoshone/Bannock Tribe, and Shoshone/Paiute Tribe): ICBVI, along with IDVR entered into one collaborative cooperative agreement with three of the four federally funded Tribal VR programs in the state, while also maintaining a single cooperative agreement with the fourth Tribal VR program. These revised cooperative agreements include the WIOA requirements, specifically to include address transition services to students and youth with disabilities. This agreement will facilitate ICBVI's

engagement with the Native American Indian Tribes that reside within the State to identify methods to better communicate the mission, goals, purpose and programs of ICBVI, and to identify processes to better facilitate referrals into ICBVI programs as well as implementation and completion of programs for employment outcomes.

ICBVI will work collaboratively with Department of Labor and the Idaho Commission on Hispanic Affairs to identify methods to better communicate the mission, goals, purpose and programs of ICBVI, and to identify processes to better facilitate referrals into ICBVI programs as well as implementation and completion of programs for employment outcomes. ICBVI will continue to collaborate with Department of Education to ensure that transition age students are made aware of ICBVI services and how to access them. This is occurring at a State level with ICBVI's involvement in the Interagency Transition Council as well as regional level where the VR counselors are in direct communication with individual school staff. ICBVI will continue to strengthen its collaborative work with Idaho Educational Services for the Blind and Visually Impaired (IESDB).

4. THE METHODS TO BE USED TO IMPROVE AND EXPAND VR SERVICES FOR STUDENTS WITH DISABILITIES, INCLUDING THE COORDINATION OF SERVICES DESIGNED TO FACILITATE THE TRANSITION OF SUCH STUDENTS FROM SCHOOL TO POSTSECONDARY LIFE (INCLUDING THE RECEIPT OF VR SERVICES, POSTSECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES)

The COVID-19 pandemic significantly altered the manner in which we engaged students in Pre-Employment Transition Services. Most in-person programs and serves were cancelled, including our summer residential programs. Due to pandemic related restrictions, most Pre-ETS activities shifted to a on-line learning environment. Work based learning experiences, a significant part of our programs for our students, were virtually non-existent. However, in person learning and work experiences gradually resumed in in PY 21, and we anticipate resuming our residential summer programs in 2022.

The formal interagency agreement with the Idaho State Department of Education (SDE), the Idaho Division of Vocational Rehabilitation (IDVR), and the Idaho Commission for the Blind and Visually Impaired (ICBVI) contains a number of provisions designed to promote communication and the sharing of technical expertise in transition planning. The agreement stipulates that the vocational rehabilitation agency must provide consultative and technical assistance services to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including employment. The Commission's Project Coordinator for Transition Services will continue to improve and expand Pre-ETS across the state.

ICBVI is committed to working collaboratively with the IESDB, IDVR, and all regional school districts to identify all eligible (or potentially eligible) secondary students in the state of Idaho. Furthermore, ICBVI is committed to reaching out to rural communities in this effort. ICBVI currently has two summer programs that are targeted towards high school students: 1) Summer Work Experience Program (SWEP) and, 2) College Days. Curriculum in both of these programs is being reviewed, expanded and modified, as appropriate, to ensure they meet all of the criteria of Pre-ETS.

As previously mentioned in this plan, the state VR program (ICBVI and IDVR) have agreed to lower the minimum age for the receipt of Pre-ETS to 14 years old. This will increase the number of students who will be eligible for Pre-ETS in the state.

In PY 2021, the Commission was able to add an Instructor of the Blind position to assist the Project Coordinator with the planning and delivery of Pre-ETS.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE

ICBVI is committed to working with Idaho's CRP community. ICBVI has implemented training for CRPs who are interested in working with the blind and visually impaired. ICVBI is bringing this training to every region in the state. In 2018, ICBVI developed a cooperative agreement with all CRP's, which is reviewed on an annual basis with all CRP's who provide services to ICBVI clients; with emphasis on the provision of Pre-Employment Transition Services.

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA

ICBVI and IDVR negotiated levels of performance for MSG's, and began reporting data in PY2020. In PY 20, the negotiated level of performance was 38.5%. The actual level of performance in PY 2020 for the Title IV programs was 52.6%.

In PY 2022, the Title IV programs expect to begin reporting on the remaining performance measures, with the exception of Effectiveness in Serving Employers.

The WIOA Core Partners completed a project in PY 2021which allowed the partners to track co-enrollment data across programs. This project was financed through a Workforce Data Quality Initiative (WDQI) grant.

While ICBVI has an agreement to access Idaho's Statewide Longitudinal Data System (SLDS) in order to pull education related data elements that will allow ICBVI to better understand what factors promote quality sustained competitive integrated employment, unfortunately, the SLDS education data received to this point is not current enough to use for MSG performance.

The Commission has used the RSA Data Dashboards as an interim tool to better reporting under Section 116. The Commission will continue to collect and analyze data to inform initial baseline thresholds to establish levels of performance to use for future negotiations with RSA. We expect to have more complete baseline data by the 2024 plan submission and will then be able to articulate strategies for performance improvement based upon emerging trends and data.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES

The WIOA Advisory Group, in conjunction with the Idaho Division of Vocational Rehabilitation has agreed that both ICBVI and IDVR will be lead agencies in addressing the continuing education and technical assistance needs of external workforce partners in best serving individuals with disabilities. ICBVI and IDVR will jointly sponsor a yearly needs assessment of workforce partners regarding employment and disability. This collaboration will include the establishment of stand-alone informational products, tailored face-to-face trainings and informal consultation as needed. ICBVI will coordinate activities with mandatory One-Stop partners by sharing program contact information, eligibility criteria, and training on program services and mission. The Commission will maximize services to individuals with disabilities through increased collaboration and integrated service delivery with various partners in One-Stop centers. Comprehensive information and training will be provided to outside organizations such as, the Department of Mental Health and Welfare's Division of Behavioral Health, School to Work Transition, American Indian Vocational Rehabilitation Services, and Centers for Independent Living. Participants will be encouraged to co-enroll in applicable services at the local One-Stop to ensure participants can benefit from the full range of services available to them.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

The following goals are based on the recommendations from the Statewide Comprehensive Needs Assessment completed in 2020 with priorities developed for PY 2020—2021 period;

based upon input from a broad spectrum of stakeholders including clients, ICBVI staff and other key informants.

Goal 1: Increase independence and employment outcomes through quality rehabilitation services.

- Priority 1: Provide quality independent living skills training;
- Priority 2: Improve access to job training and placement services;
- Priority 3: Provide outreach training to all community partners; and
- Priority 4: Improve services to business across the state.

Strategies for Goal 1 include:

- Monitor program outcomes through client surveys. ICBVI is updating the VR participant survey for PY 2020.
- Expand statewide business engagement activities through ICBVI initiatives or other activities with WIOA partners.
- ICBVI will improve the strategies utilized to monitor outreach and training for regional offices.
- ICBVI will provide training services through regional instructors and the Assessment and Training Center (ATC).
- Develop new and innovate strategies for the delivery of VR services throughout the state.

Goal 2: Reduce barriers to employment for individuals who are blind or visually impaired.

- Priority 1: Continued education and training to employers, educators, and community partners.
- Priority 2: Continue to address transportation issues that face ICBVI clients through our efforts in the One-Stop system.
- Priority 3: Continue to address accessibility issues within the One-Stop system.
- Priority 4: Increase/improve access to assistive technology and training.
- Priority 5: Increase outreach activities to rural communities.

Strategies for Goal 2:

- Develop new and/or innovative approaches to outreach and education to our community partners.
- Continued participation in the development of the One-Stop system, with emphasis on service delivery to rural communities.
- Consultation and accessibility training to One-Stop partners to address barriers to individuals who are blind or visually impaired.
- Develop new and innovative strategies for providing rehabilitation technology and disability related skills training.

Goal 3: Improve transition services for students

- Priority 1: Increase work-based learning experiences for students prior to exiting high school.
- Priority 2: Engage work force partners in the development and provision of Pre-Employment Transition Services.
- Priority 3: Continue emphasizing training and education of key stakeholders on ICBVI programs and services, with emphasis on Pre-employment Transition Services.

Strategies for Goal 3:

- ICBVI will revise current policies around work-based learning experiences to reflect a more curriculum-based approach to these activities. ICBVI will also begin developing outcome measure for all Pre-Employment Transition Services.
- Collaborate with regional CRP's in the development and provision of work-based learning experiences for students with disabilities. ICBVI will update the current MOU to reflect policy changes in Pre-Employment Transition Services.
- ICBVI will engage LEA's and other key education (Idaho State Board of Education, State Department of Education) stakeholders in the provision of transition services. ICBVI will continue its collaborative efforts with the Idaho Division of Vocational Rehabilitation in the coordination, monitoring, and evaluation of Pre-employment Transition Services in the state.
- Develop new and innovative strategies for providing Pre-Employment Transition Services.

Goal 4: Improve VR program efficiency through continuous quality improvement activities

- Priority 1: Evaluate VR program services and delivery
- Priority 2: Monitor program service records to ensure compliance to state and federal laws and regulations.
- Priority 3: Continue to develop policies, procedures, and internal controls to ensure accuracy and validity of program performance reporting.

Strategies for Goal 4:

- Revise ICBVI's program satisfaction survey(s) to help identify areas for program improvement.
- Continue to improve the internal case review process to align with WIOA requirements and inform the continuous quality improvement cycle.
- Revise and improve policies, procedures, and internal controls relating to the RSA-911 data collection and reporting.
- Revise and improve policies, procedures, and internal controls relating to Pre-Employment Transition Services.
- Continued participation in the Workforce Data Quality Initiative (WDQI) with WIOA core partners.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

ICBVI does not have any innovation and expansion activities planned for the duration of this state plan.

C. OVERCOME IDENTIFIED BARRIERS RELATING TO EQUITABLE ACCESS TO AND PARTICIPATION OF INDIVIDUALS WITH DISABILITIES IN THE STATE VR SERVICES PROGRAM AND THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM.

Sections (o)(3) and (o) (4) of the Commission's program specific strategies (contained above) further elaborate on how the ICBVI will address equitable access and participation as it relates to this section.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

The following is a progress report of our goals and priorities for the current state plan:

Goal 1 - Increase independence and employment outcomes through quality rehabilitation services.

PY 2022 Update:

- ICBVI developed a new participant satisfaction survey in PY 20. Any participant who exits with a IPE is encouraged to complete the survey. Participant satisfaction rate was 100% for individuals who completed the survey in PY 20.
- Business Engagement: The Commission entered an Intensive Technical Assistance (ITA) agreement with the VRTAC-QE. This ITA begins early February 2022 and continue until the end of May 2022.
- VR Staff Training: The COVID-19 pandemic created opportunities to explore new and different approaches for VR staff training. The Commission has adopted the Microsoft Teams platform as its platform and repository for all VR related training.
- Direct services to participants were extremely limited during the early part of the pandemic. In PY 2021, the Commission has been increasing our capacity to provide in person services, as CDC and state guidance allows.

Performance Measures for Goal 1:

PY 2018

Number of client's who achieved competitive integrated employment- 32

There were no participants who exited the VR program with a supported employment outcome.

Measurable Skills Gains: 14

Pre-Employment Transition Services provided – 324

Average hourly wage at program exit – $18.40

PY 2020

Number of client's who achieved competitive integrated employment- 22

There were no participants who exited the VR program with a supported employment outcome.

Measurable Skills Gains: 34

Pre-Employment Transition Services provided – 175

Average hourly wage at program exit – 15.08

Goal 2 -– Reduce barriers to employment for individuals who are blind or visually impaired.

PY 2022 Update: While outreach activities were limited due to COVID-19, the Commission was able to engage participants and community partners in new ways (virtual platforms).

Outreach to LEA's was extremely limited during the pandemic, due to staffing shortages, school closures and other barriers created by COVID-19.

Participation in the One-Stop system continued through the pandemic. In PY2020, ICBVI and the core partners engaged in collaborative effort (Data Labs) to create a common intake process for the state workforce system.

Performance Measures for Goal 2:

PY 2018

Total number of referrals to the VR program: 153

- One individual was referred from the tribal VR program.
- No individuals were referred from the One Stop system.

Total number of applications: 129

Total number of individuals found eligible for services: 129

Total number of individuals with an approved IPE: 106

Total number of Hispanic individuals served: 30

Outreach performance (defined as substantial information shared about the VR program and services)

Number of contacts to CRP's: 23

Number of contacts to LEA's: 56

Number of contacts to employers: 29

PY 2020

Total number of referrals to the VR program: 137

- No individuals were referred from the tribal VR program.
- No individuals were referred from the One Stop system.

Total number of applications: 64

Total number of individuals found eligible for services:

Total number of individuals with an approved IPE: 73

Total number of Hispanic individuals served: 34

Outreach performance (defined as substantial information shared about the VR program and services)

Number of contacts to CRP's: 12

Number of contacts to LEA's: 24

Number of contacts to employers: 23

Goal 3 – Improve transition services for students.

PY2022 Update:

As previously mentioned, engagement with LEA's was extremely limited during the pandemic, due to staffing shortages, school closures and other barriers created by COVID-19.

COVID-19 also limited our ability to engage students in WBLE's with regional employers. However, this is rapidly rebounding in PY 21.

Performance Measures for Goal 3:

PY 2018

Total number of client's who received rehabilitation technology services: 141

Total number of regional on-site office visits by the statewide Assistive Technologist: 10

Total number of state-wide training seminars conducted by our ATC: 6

PY 2020

Total number of client's who received rehabilitation technology services: 134

Total number of regional on-site office visits by the statewide Assistive Technologist: 3

Total number of state-wide training seminars conducted by our ATC: 0

Goal 4: Improve VR program efficiency through continuous quality improvement activities

PY 2022 Update:

Throughout the pandemic, the Commission worked diligently to make progress with program evaluation and quality assurance activities:

- A Participant Satisfaction Survey was completed and launched in PY 2020;
- RSA-911 dashboards were utilized to make improvements in reporting and program performance;
- A Data Validation Policy and Procedural Manual was implemented in PY 2021;
- Program audits : The current instrument (Survey Monkey platform) was updated for the PY 2020 audit cycle. An Executive Summary of the audits findings was developed to document audit findings, corrective actions, and staff training needs;
- ICBVI began utilizing Power BI for generating program data and reports;
- The Commission completed an Internal Controls Assessment that utilizes the COSO framework. This assessment was completed in PY 2021.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

The COVID-19 pandemic had a significant impact on achieving our program goals and priorities in PY 2020.

2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBUTED TO THE ACHIEVEMENT OF THE GOALS

ICBVI has collaborated with the general agency to serve clients with SE needs, and will continue that practice. The Commission collaborates with IDVR in setting goals and priorities for the program. A strategy that has been implement the current FFY is the requirement of co-enrollment with IDVR for all eligible individuals who have a SE goal.. This has benefitted ICBVI clients in terms of comprehensive IPE development and case coordination. The two state units have implemented a procedure for tracking co-enrollment, and this is monitored on a quarterly basis.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

The ongoing challenge for the state's Supported Employment program to maintain the current level of funding for long term supports from the legislature.

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

Performance of Title IV on 116 Primary Performance Indicators, as reported in the ETA 9169.

Primary Indicator of Performance	PY2018	PY2019	PY2020
Employment Rate-2nd Quarter after Exit	53.6%	59.3%	58.9%
Employment Rate-4th Quarter after exit	53.1%	54.6%	57.3%
Median Earnings-2nd Quarter after exit	$3734	$4055	$4259
Credential Attainment	---	3.8%	40.3%
Measurable Skill Gains	35.3%	51.2%	52.6%
Effectiveness in Serving Employers	---	---	---

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED

n/a

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES

Supported employment services are provided to our blind or visually impaired clients who have multiple disabilities, who have the most significant disabilities, who are consequently are eligible to receive supported employment services. These multiple disabilities include developmental disabilities, traumatic brain injuries, and mental illness or a combination of these disabilities. SE services are provided by the community rehabilitation programs which are accredited by CARF or RSAS.

Supported Employment Services include the following:

Time limited services needed to include job coaching and communication with the employers, to support training while the individual is employed. Continued funding of SE cases is contingent upon progress toward learning the essential functions of the job and/or fading hours of ongoing support to the level of employer satisfaction immediately prior to the assessment of initial stability.

Any other service that would be identified as requisite to the targeted supported employment outcome after placement ahead of transfer to externally funded ongoing support services.

SE may also include Customized Employment elements, after placement.

Extended services for youth are available for qualifying youth in the absence of other ongoing support services available in the community.

ICBVI and IDVR provide the upfront training until the clients are stabilized on their jobs and at that point they are transferred to the long-term support services through Health and Welfare HCBS waiver or the IDVR Extended Employment Services (EES) Program.

Extended services are available to youth with most significant disabilities for up to 4 years, or until the individual turns 25 years old and no longer meets the definition of a “youth with a disability”, whichever comes first.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES

WIOA extended the SE time period from 18 to 24 months. The Commission has created protocols for and has made extended services for youth available when needed as required by WIOA.

Extended services may be provided to youth with MSD for a period not to exceed four years, or until the individual reaches the age of 25 and no longer meets the definition of a "youth with a disability" (whichever comes first) with the funds reserved under §363.22. SE services for adults will not exceed 24 months, unless an exception is granted. The Commission requires a third-party commitment to designate a long-term support provider. Since 2004, the Extended Employment Services (EES) program has been housed under IDVR and along with Medicaid are the two providers of long-term funding for extended services in Idaho. A supported employment participant may only be transitioned to long term support based on an assessment of rehabilitation goal achievement and job stability. Periodic monitoring occurs to ensure that each client receiving SE services is making satisfactory progress.

VOCATIONAL REHABILITATION (BLIND) CERTIFICATIONS

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) IS AUTHORIZED TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN UNDER TITLE I OF THE REHABILITATION ACT OF 1973 (REHABILITATION ACT), AS AMENDED BY WIOA[14], AND ITS SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT[15];

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Idaho Commission for the Blind and Visually Impaired

2. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (ENTER THE NAME OF DESIGNATED STATE AGENCY)[16] AGREES TO OPERATE AND ADMINISTER THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[17] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[18] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER SECTION 111 OF THE REHABILITATION ACT

ARE USED SOLELY FOR THE PROVISION OF VR SERVICES AND THE ADMINISTRATION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

ENTER THE NAME OF DESIGNATED STATE AGENCY

Idaho Commission for the Blind and Visually Impaired

3. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE VI OF THE REHABILITATION ACT FOR SUPPORTED EMPLOYMENT SERVICES, THE DESIGNATED STATE AGENCY AGREES TO OPERATE AND ADMINISTER THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[19] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[20] , POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE UNDER TITLE VI ARE USED SOLELY FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES AND THE ADMINISTRATION OF THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN;

4. THE DESIGNATED STATE AGENCY AND/OR THE DESIGNATED STATE UNIT HAS THE AUTHORITY UNDER STATE LAW TO PERFORM THE FUNCTIONS OF THE STATE REGARDING THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY UNDER STATE LAW TO RECEIVE, HOLD, AND DISBURSE FEDERAL FUNDS MADE AVAILABLE UNDER THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Beth Cunningham

Administrator

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

Beth Cunningham

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

CERTIFICATION SIGNATURE

Signatory information	Enter Signatory information in this column

Signatory information	Enter Signatory information in this column
Name of Signatory	Beth Cunningham
Title of Signatory	Administrator
Date Signed	03/14/22

ASSURANCES

The State Plan must include	Include
1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:Administration of the VR services portion of the Unified or Combined State Plan:	
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.b. The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (A or B must be selected):	
3.b.(A) “is an independent State commission” (Yes/No)	Yes
3.b.(B) “has established a State Rehabilitation	No

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

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

The State Plan must include	Include
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 section 101(a)(14)of the Rehabilitation Act	
4.i. Meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. Strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	
5.a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act	
5.b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act	
5.c. The designated state unit will coordinate activities with any other State agency that is	

The State Plan must include	Include
functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act	
6. Financial Administration of the Supported Employment Program:	
6.a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act	
6.b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act	
7. Provision of Supported Employment Services:	Yes
7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act	
7.b. The designated State agency assures that:	
7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act	

The State Plan must include	Include
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	58.9%	59.5%	58.9%	60.0%
Employment (Fourth Quarter After Exit)	57.3%	57.8%	57.3%	58.3%
Median Earnings (Second Quarter After Exit)	$4,365	$4,400	$4,472	$4,500
Credential Attainment Rate	42.8%	42.8%	45.3%	44.0%
Measurable Skill Gains	55.1%	55.1%	57.6%	57.6%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

TRADE ADJUSTMENT ASSISTANCE (TAA)

Yes

JOBS FOR VETERANS' STATE GRANTS

A. HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG;

Idaho covers a large geographic area with limited funding making it unfeasible to station a DVOP in every local office. In order to improve employment outcomes for veterans, the IDOL strategically stations our DVOPs and LVER throughout the state. In 2019, the agency reorganized its service delivery model. Seven offices located throughout the state in Post Falls, Lewiston, Caldwell, Boise, Twin Falls, Pocatello and Idaho Falls serve as central coordinators for all department veterans' services activity within their geographic regions. DVOP staff are primarily assigned to local offices with the highest numbers of registered veterans. DVOP

staffing also considers whether an area has a large educational institution that can translate to large numbers of Veteran Readiness and Employment (VR&E) participants.

IDOL employs one full-time regional Local Veterans Employment Representative (LVER) who works in the largest labor market area in the state: Boise/Meridian/Nampa. There is also a full time DVOP presence in both the Boise and Caldwell offices and a consolidated DVOP/LVER position in Boise, Pocatello and Post Falls. In rural areas of the state where fewer veterans reside, IDOL assigns DVOPs on a half-time basis. Idaho has three individuals who devote half of their time (20 hours/week) performing DVOP functions and the other half (20 hours/week) performing Employment Services (ES) or Workforce Innovation and Opportunity Act (WIOA) duties. In an effort to ensure that all veterans have access to our most knowledgeable resource, a DVOP conducts monthly outreach to rural areas of the state where there are no permanently stationed DVOPs to provide individualized career services to veterans with significant barriers to employment (SBEs).

Our DVOPs work closely with the state's Employment Services (ES) staff. The ES staff are trained to work with employers and to provide job developments, and recruit veterans for employment. Our DVOP staff also maintain a list of job ready veterans for our LVER and consolidated staff to use during employer visits. The LVER and consolidated staff review the veteran's resume and case management file to ensure appropriate referrals are made to employers.

Front desk staff are instructed to ask the veteran or veteran's spouse to complete an intake form to determine eligibility for DVOP services or if a referral to an ES consultant is appropriate.

A veteran who enters an American Job Center with a half-time DVOP Specialist receives the same services as a veteran who enters one of the state's Comprehensive American Job Centers with full-time grant-funded staff. If a veteran needs more than core services from one of the AJC offices without an assigned DVOP, they are assessed by staff to determine if a referral to the nearest DVOP is appropriate. An appointment is then made during the DVOP's next rural office visit where the veteran will receive all the services available in the larger offices.

The state's shared internal website for all department staff includes enhancements that allow AJCs without a DVOP to provide the same information available in offices with veterans' staff. This tool is available to all DVOPs as well as managers and other ES staff who serve veterans. All training documents are uploaded to the internal website for all AJC staff to view.

B. THE DUTIES ASSIGNED TO DVOP SPECIALISTS AND LVER STAFF BY THE STATE; SPECIFICALLY IMPLEMENTING DVOP AND LVER DUTIES OR ROLES AND RESPONSIBILITIES AS OUTLINED IN 38 U.S.C. § 4103A AND 4104. THESE DUTIES MUST BE CONSISTENT WITH CURRENT GUIDANCE;

Duties of the DVOP:
DVOP staff provide the full array of workforce services to veterans with significant barriers to employment (SBEs) and eligible persons with their primary focus on providing individualized career services to those veterans as described indicated in the most current guidance. DVOP staff utilize the case management approach to serve veterans with barriers to employment and with special workforce needs. These services include, but are not limited to:

- Outreach to locate veterans in need of individualized career services; Assessment, including a documented plan of service (Individual Employment Plan (IEP)) and consistent, continual contact;
- Counseling/group counseling and career/vocational guidance;
- Referral of veterans to supportive or remedial services;
- Promoting VR&E and WIOA services to eligible veterans and other eligible persons;

- Referral of veterans to job focused and outcome-driven training, certification;
- Job development services;
- Referral of veterans to employment opportunities.

All the state's AJC managers have attended NVTI training; all keenly aware of the role of the DVOP. They promote priority of service for covered persons, through training and facilitation, in all federally funded programs, primarily Wagner-Peyser and WIOA. All office staff are familiar with the full array of veteran services and are instructed to provide priority of service to qualified covered persons.

All local offices train non-grant-funded staff to refer to the department's internal website to provide basic veterans information. The IDOL website also has a veterans' link specifically to help the self-service veteran navigate through the job search functions as well as the services available to them.

Non-grant-funded AJC staff are trained to triage customers and screen for veteran status as they arrive. Staff assess for career services such as job referral, resume assistance, job search guidance, the need for layoff assistance or more intensive WIOA services. If the assessment indicates a need for more than just core services and the veteran is eligible to meet with a DVOP , they are referred to the DVOP. The DVOP informs the veteran of all the available services and determines if enrollment in WIOA is beneficial and appropriate. The DVOP concentrates his or her efforts on serving those veterans who have special employment and training needs by focusing on the facilitation of individualized career services through case management.

Duties of the LVER:
The Local Veterans Employment Representative (LVER) according to the most current guidance must perform only the duties outlined in 38 USC 4104 (b), which states, "the LVER's principle duties are to:

(1) conduct outreach to employers in the area to assist veterans in gaining employment, including conducting seminars for employers and, in conjunction with employers, conducting job search workshops and establishing job search groups; and
(2) facilitate employment, training and placement services furnished to veterans in a State under the applicable State employment service delivery systems.

Therefore, the LVER is assigned duties that promote to employers, employer associations, and business groups the advantages of hiring veterans. When employer outreach is primarily accomplished by a "business services team" or like entity, the LVER must be included as an active member of that team. The LVER advocates for all veterans served by the AJC with business, industry, and other community-based organizations by participating in appropriate activities such as:

- Planning and participating in job and 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.

Duties of the consolidated DVOP/LVER position:
The consolidated position will have the same roles and responsibilities as the DVOP and LVER positions listed above. The only difference will be the time spent in each position. It will vary but will consist of approximately 20 hours performing DVOP duties and 20 hours performing LVER duties each week.

C. THE MANNER IN WHICH DVOP SPECIALISTS AND LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEM OR AMERICAN JOB CENTER;

In order to initiate services through the One-Stop system, all veterans are registered in the IdahoWorks system (IDOL's automated customer registration and job matching system). Because this job matching system relies heavily on the information supplied by customers, veteran registration files are routinely reviewed for completeness and for opportunities to update experience or newly acquired job skills. Those veteran customers with registration files needing additional information are contacted via e-mail, telephone, or mail and offered assistance in completing their registration record and are informed of available services and invited to contact the office for further assistance.

Intake forms listing significant barriers to employment (SBE) are handed to veterans at the intake desk. If an SBE is indicated the veteran is routed to see a DVOP. If no barrier is indicated the veteran is routed to see an ES staff person.

DVOPs attend ES and WIOA meetings on a regular basis and make appropriate referrals to WIOA. They also keep a list of job ready veterans that is available to all ES staff for appropriate job referrals.

Other partners are made aware of the services available from a DVOP through outreach. Partners are invited to visit local offices to see the services available directly.

IDOL has one strategically placed a regional LVER whose primary job is to conduct outreach, promote job developments with local employers, and market our services to those employers. The LVER is tasked with performing job development and employer outreach with the goal of facilitating employment opportunities for veteran job seekers. IDOL also has three consolidated positions which utilize part of their work hours to carry out the statutory duties of a LVER. The LVER and consolidated positions work with other organizations to jointly host events such as job search workshops and hiring events in local offices. They market veterans to employers using IDOL's marketing materials.

They also periodically visit employers within their area of responsibility to explain the benefits of using IDOL services and to remind them of the benefits of hiring veterans as well as the availability of a job-ready pool of highly trained veterans. They attend quarterly employer committee meetings held by various AJCs throughout the state to promote the hiring of available veterans. Idaho strives to gain an intimate knowledge of employer practices and review the services available to them from the Department.

They work closely with our ES staff to promote the hiring of veterans to private and public employers. During these outreach visits, they inform the employer about the services that IDOL provides, including DVOP services. ES staff also create employer awareness of this program and the duties of both the DVOP specialist and LVER. This joint effort opens the door to the LVER to work with these employers to create potential veteran job development opportunities.

The state agency then e-mails, or hand delivers veteran/employer information packets to employers. The intended result is to share with the employer community the benefits of hiring veterans and to encourage employers to announce their job openings through IDOL, where veterans have priority to apply for the jobs for which they qualify. The consolidated position performs both the LVER and DVOP duties as described above.

D. THE INCENTIVE AWARD PROGRAM IMPLEMENTED USING THE 1% GRANT ALLOCATION SET ASIDE FOR THIS PURPOSE, AS APPLICABLE;

Cash incentive Award Program: This award shall be used in accordance with VPL 01-22 and Title 38 U.S.C.§ 4112 or the most recent guidance from USDOL-VETS. The objective of the JVSG cash incentive award program, known as the Veterans Service Performance Incentive Award Program, is to recognize, promote and reward exceptional performance in the provision of service to veterans within the context of statutes and regulations. The award program will create an awareness and continuous level of interest in the importance of providing intentional, high-quality outreach and services for veterans and promote an environment that engenders continuous improvement in the way staff support veterans across the spectrum of service. The award system shall continue to operate as defined in the applicable State Plan and as approved by USDOL. The state anticipates that individuals and teams will recognize the value and process of the awards program and will, as a result, develop a competitive attitude within the agency that supports esprit de corps within the team while sharpening the focus on service to other eligible persons. Incentive awards shall be expended up to and including 1 percent of the total grant amount for the fiscal year, which is set aside strictly, by the fiscal department of IDOL, for this purpose in the annual grant budget. Awards shall be determined based on a percentage of total award available for that fiscal year but shall not (in total) exceed 1 percent of the total available funds for a given fiscal year or the most current USDOL guidance on grant-funded incentive award amounts.

Idaho elects to use one percent of the Jobs for Veterans State Grant (JVSG) allocation to provide cash performance awards for eligible employees in local one-stop offices. The IDOL has a team centric vision that allows for all members to strive for excellence in all aspects up to and including serving our nations veterans. This is the reasoning behind awarding the cash incentive awards to the top three highest performing one-stop offices, the team performs together, and the team is awarded together. The awards program is intended to encourage and incentivize the improvement and modernization of employment, training, and placement services for veterans, and recognize eligible employees and offices for excellence in the provision of such services, or for having made demonstrable improvements in the provision of services to veterans.

Award Amounts:
The state shall request 1 percent of its annual allocation for each year's JVSG grant as performance incentive awards for eligible one-stop Offices that will be paid in cash.

Local One-Stop Office Award Amounts:

1. 1st Place Local Office Winner (approximately 1/3 of the annual allocation)
2. 2nd Place Local Office Winner (approximately 1/3 of the annual allocation)
3. 3rd Place Local Office Winner (approximately 1/3 of the annual allocation)

Eligibility Criteria: Veterans Service Performance Awards will be granted to IDOL's local one-stop offices to recognize exceptional service to veterans or for specific activities or initiatives that promote successful employment of veterans. Nominations must detail the activities that meet this aim and may also include descriptions of how the Office achieved one or more of the following:

1. System improvements that result in improved services to veterans and other eligible individuals under JVSG,
2. Outstanding case management on behalf of a JVSG participants,
3. Exceptional effort expended to assist a homeless veteran, formerly incarcerated veteran, or other hard to place JVSG participant,

4. Activities led to improve performance, reduce time or cost, or promote collaboration around service to veterans,
5. Outstanding outreach or placement efforts on behalf of veterans and JVSG participants,
6. Extraordinary community relations efforts to increase the awareness of veterans' issues, or
7. Development of a program, for which the impact may not be directly measurable, (i.e. resume skills building program), targeted to support veterans.

Selection and Award Process: The solicitation for nominations shall be published in the monthly newsletter each March. The application must be completed, signed, and scanned to the State Veterans Coordinator by April 1 of each grant year. Each nomination will be screened to ensure the recipient is eligible to receive the award under state and department merit award policies. The State Veterans Coordinator will convene an award review committee of not less than 5 members of the Agency to include One area Manager, Two Office Managers, One Central Office employee and One ES staff member to review nominations and make award recommendations to the Administrator. Nominations will be scored based on information provided in response to the seven questions on the nomination form and may use a scoring rubric established by the State Veterans Services Coordinator. Recommendations after being reviewed by the Administrator will be forwarded to the Director by April 17 of each grant year. The Director will consider the recommendations and approve final awardees.

Winners will be announced in May of each grant year and all awards will be distributed by July of each year.

IDOL will provide an annual incentive award report as per IAW VPL 07-19, or the most updated policy guidance on this subject.

References & Resources:
VPL 01-22, VPL 01-22 Attachment 5, Public Law 109-461 Title VI Sec. 603, 38 U.S.C. § 4112

E. THE POPULATIONS OF ELIGIBLE VETERANS TO BE SERVED, INCLUDING ANY ADDITIONAL POPULATIONS DESIGNATED BY THE SECRETARY AS ELIGIBLE FOR SERVICES, AND ANY ADDITIONAL POPULATIONS SPECIFICALLY TARGETED BY THE STATE WORKFORCE AGENCY FOR SERVICES FROM ONE-STOP DELIVERY SYSTEM PARTNERS (E.G., NATIVE AMERICAN VETERANS; VETERANS IN REMOTE RURAL COUNTIES OR PARISHES);

IDOL's DVOPs involve themselves in their communities in many ways to make veterans aware of the benefits, employment and training services available to them. Monthly outreach to the homeless shelters in their areas is an activity that enables the DVOP to complete outreach and provide individualized career services to those veterans that have no mode of transportation. Many of these veterans have the need for individualized career services that are provided by our DVOPs. Those who just need core services such as job search, and resume assistance are referred to AJC ES consultants.

DVOPs serve the following population of veterans per VPL 03-14 change 1 and 2 and VPL 03-19 or current guidance.

- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C. 4211(1) and (3); Special disabled and disabled veterans are those:
  -Who are entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs' or,
  -Were discharged or released from active duty because of service-connected disability.

- Homeless as defined in Section 103(a) and (b) of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302(a) and (b) as amended;
- A *recently separated service member*, as defined in 38 U.S.C. 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months; i.e. the term of unemployment over the previous 12 months remains 27 weeks; however, the requirement of 27 consecutive weeks is eliminated;
- An *offender*, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration, i.e. the expanded definition of SBE includes eligible veteran or eligible spouse who is currently or was formerly incarcerated by removing the within the last 12 months requirement.;
- Lacking a high school diploma or equivalent certificate; or
- Low-income individual (as defined by WIOA Section 3 (36).
- Veterans aged 18-24
- Vietnam-era Veterans
- Transitioning members of the Armed Forces who have been identified as in need of intensive services (now referred to as individualized career services);
- Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in a Military Treatment Facility or Warrior Transition Unit; and
- The spouses or other family caregivers of such wounded, ill, or injured members.

The USDOL VETS has a MOU with VR&E. It was signed on 9/29/2020. IDOL is committed to maintaining a strong relationship with VR&E and chooses to maintain an Intensive Services Coordinator (ISC), a half-time position filled by a full-time DVOP. The ISC is out stationed, at times, at the Boise VA Regional Office, but veterans enrolled in the VR&E program are referred to Idaho DVOPs from counselors assigned to Spokane and Seattle, WA, Salt Lake City, UT, and other regional locations. The ISC or assigned DVOP provides Labor Market Information (LMI) as part of the vocational evaluation process. The VA VR&E develops a rehabilitation plan and then approximately 90 days prior to the participant's expected completion of training or education, the VR&E office completes a Job Ready Assessment and refers the veteran to the IDOL ISC or appropriate DVOP for individualized career employment assistance. The VA VR&E office and IDOL jointly monitor the job seeking process to determine when the veteran has entered employment and when the veteran can be considered "rehabilitated."

The IDOL continues to develop new strategies to reach homeless veterans and those at risk of becoming homeless. Our DVOPs and LVER, based on their role and responsibility identified in current guidance, actively help plan and participate in three Stand Down events throughout the state - Boise, Pocatello, and Post Falls. These events provide much needed information, assistance, and supportive services to over 1,500 needy veterans and family members every year.

The Boise VA Regional Office administers the Grant Per Diem program which helps shelter many homeless veterans while attending an education program. The VA Homeless Coordinators work closely with our DVOPs to secure employment for participants in this program. Partnerships like these are proving very beneficial for Idaho veterans. Over the past several years, the number and quality of facilities and services for the homeless have improved dramatically in Idaho's most populated area, the Treasure Valley. DVOPs are in the process of developing partnerships with staff at these new facilities to provide individualized career services and the referral to employment needed to help veterans break the cycle of

homelessness. As these partnerships develop, we plan to participate in service information days at the shelters on a regular basis.

Idaho has DVOPs strategically placed in areas near Native American reservations. Outreach activities are conducted at the state's option and conducted with approval of the tribes. A fulltime DVOP is located minutes away from the Shoshone Bannock reservation in Southeast Idaho and provides outreach and individualized career services to the disabled veterans in that area.

In Lewiston, a half-time DVOP works with the Nez Perce Tribe in Lapwai, Idaho. He meets with referrals from tribal veteran representatives, attends Tribal Homeless Veteran Stand Downs and Tribal Resource Fairs, and maintains an open dialogue with Tribal Employment Rights Office (TERO).

In Post Falls, our DVOP has worked with the Veterans Coordinator representing the Coeur d'Alene Tribe based in Worley, Idaho. Most of the contact has been regarding Veteran hiring events, the Stand Down and for special events, emphasizing the provision of individualized career services.

F. HOW THE STATE IMPLEMENTS AND MONITORS THE ADMINISTRATION OF PRIORITY OF SERVICE TO COVERED PERSONS;

The description of how the state implements and monitors priority of service to covered persons is included in the Common Elements of the WIOA State Plan.

G. HOW THE STATE PROVIDES OR INTENDS TO PROVIDE AND MEASURE, THROUGH BOTH THE DVOP AND AMERICAN JOB CENTER STAFF:

1. JOB AND JOB TRAINING INDIVIDUALIZED CAREER SERVICES,

Per VPL 01-22, a response to this section is not required.

2. EMPLOYMENT PLACEMENT SERVICES, AND

Per VPL 01-22, a response to this section is not required.

3. JOB-DRIVEN TRAINING AND SUBSEQUENT PLACEMENT SERVICE PROGRAM FOR ELIGIBLE VETERANS AND ELIGIBLE PERSONS;

Per VPL 01-22, a response to this section is not required.

H. THE HIRE DATE ALONG WITH MANDATORY TRAINING COMPLETION DATES FOR ALL DVOP SPECIALISTS AND LVER STAFF; AND

Per VPL 01-22 a response to this section is not required.

I. SUCH ADDITIONAL INFORMATION AS THE SECRETARY MAY REQUIRE.

Idaho's PY22 & PY23 Proposed JVSG Performance Measures:
Employment Rate 2nd Quarter After Exit: 63%
Employment Rate 4th Quarter After Exit: 61%
Median Earnings 2nd Quarter After Exit: $5,500

UNEMPLOYMENT INSURANCE (UI)

A. CONTENTS OF A COMPLETE UI SQSP PACKAGE

1. TRANSMITTAL LETTER

IDAHO
DEPARTMENT OF LABOR
BRAD LITTLE, GOVERNOR
JANI REVIER, DIRECTOR

October 28, 2021

Ms. Ann Leonetti
Mr. Frank Stluka
Acting Regional Administrators, Region 6
USDOL/Employment and Training Administration
90 7th Street, Suite 17-300
San Francisco, CA 94103-1516

Dear Ms. Leonetti and Mr. Stluka,

Enclosed is the Idaho Department of Labor's Unemployment Insurance Fiscal Year 2022 Alternate State Quality Service Plan.

If you have any questions, please contact Carrie Peterman at 208-332-3570 ext. 4011, carrie.peterman@labor.idaho.gov.

Sincerely,

Jani Revier
Director

CENTRAL OFFICE • 317 W. Main St. • Boise, Idaho 83735 • Tel: 208-332-3570 • Web: labor.idaho.gov
An equal opportunity employer and service provider. Reasonable accommodations are available upon request. Dial 711 for Idaho Relay Service.

2. BUDGET WORKSHEETS/FORMS

OMB Number: 4040-0004
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: STATE OF IDAHO

* b. Employer/Taxpayer Identification Number (EIN/TIN): 82-6000966

* c. Organizational DUNS: 1025957380000

d. Address:

* Street1: 317 W MAIN ST
Street2:
* City: BOISE
County/Parish:
* State: ID
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 83735-0001

e. Organizational Unit:

Department Name: IDAHO DEPARTMENT OF LABOR

Division Name: UNEMPLOYMENT INSURANCE

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: MS.
* First Name: CARRIE
Middle Name:
* Last Name: PETERMAN
Suffix:

Title: FINANCIAL EXECUTIVE OFFICER

Organizational Affiliation:

* Telephone Number: 208-332-3570 EXT 4011
Fax Number: 208-334-6300

* Email: CARRIE.PETERMAN@LABOR.IDAHO.GOV

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

A: STATE GOVERNMENT

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

US DEPARTMENT OF LABOR EMPLOYMENT AND TRAINING ADMINISTRATION

11. Catalog of Federal Domestic Assistance Number:

17.225

CFDA Title:

UNEMPLOYMENT INSURANCE

* 12. Funding Opportunity Number:

UIPL No. 25-21

* Title:

UIPL No. 25-21 FY 2022 UI State Administration

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

ID - ALL | Add Attachment | Delete Attachment | View Attachment

* 15. Descriptive Title of Applicant's Project:

UIPL No. 25-21 - FY 2022 UI State Administration

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: 2ND IDAHO

* b. Program/Project: ALL IDAHO

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2021

* b. End Date: 09/30/2022

18. Estimated Funding ($):

* a. Federal	$15,616,685
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	$15,616,685

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- [ ] a. This application was made available to the State under the Executive Order 12372 Process for review on .
- [ ] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- [x] c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- [ ] Yes
- [x] No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

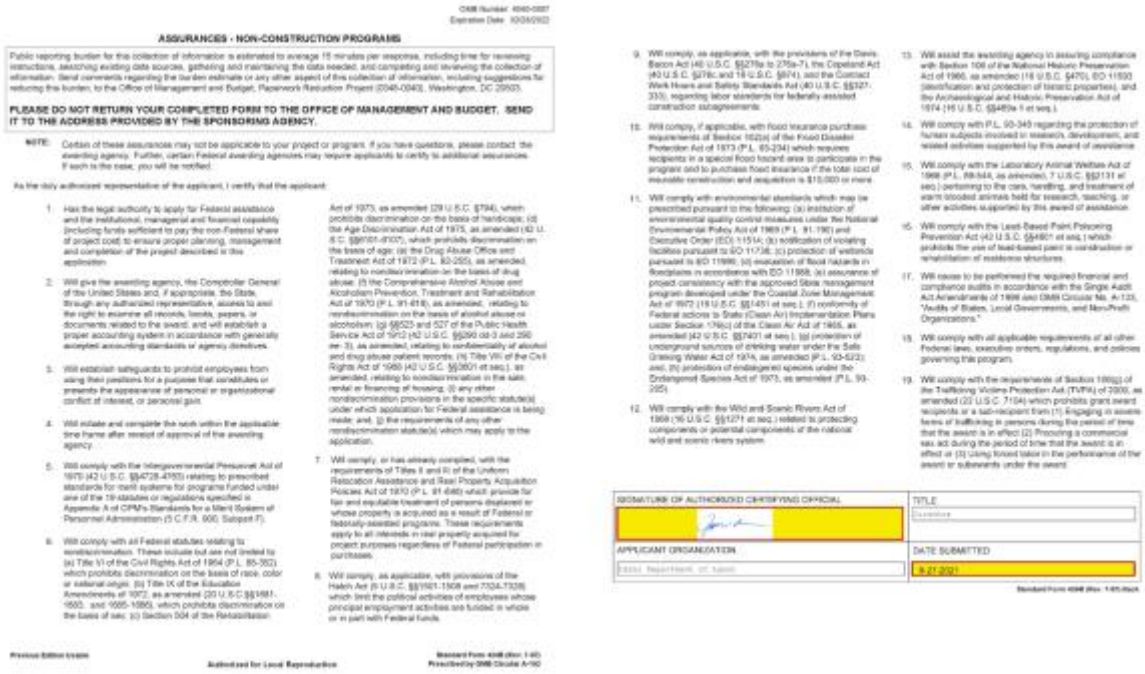
21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 216, Section 1001)**

- [x] ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:	MS.
* First Name:	JANI
Middle Name:	
* Last Name:	REVIER
Suffix:	
* Title:	DIRECTOR - IDAHO DEPARTMENT OF LABOR
* Telephone Number:	208-332-3570 EXT 3110
Fax Number:	208-334-6430
* Email:	JANI.REVIER@LABOR.IDAHO.GOV
* Signature of Authorized Representative:	Jani Revier
* Date Signed:	9-27-2021



ASSURANCES - NON-CONSTRUCTION PROGRAMS

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL | TITLE

APPLICANT ORGANIZATION | DATE SUBMITTED

9/27/2021

3. THE STATE PLAN NARRATIVE

State Quality Service Plan
State Plan Narrative
Idaho – FY 2021-2022

A. Overview

1.The Idaho Department of Labor's priorities for the FY 2021-2022 SQSP include:

a. The timely and accurate payment of UI benefits in concert with the implementation of the new programs authorized by the Coronavirus Aid, Relief, and Economic Security Act.

b. An overall integrity goal of reducing the number of improper payments and the prevention, detection, and recovery of improper and fraudulent payments.

c. Continuous business process analysis in all areas of UI to improve program performance with technology.

d. Improve state capacity to administer and operate the UI program effectively and efficiently.

e. To provide adjudication and claims processing performance that meets the standards established by USDOL.

f. To assist and improve the timely reemployment of UI claimants with continued use of the Reemployment Services and Eligibility Assessment (RESEA) program.

Prior to the Pandemic, Idaho's UI Division underwent a major process analysis and deployed a modernized UI Tax and & Benefits system. Those initiatives have shaped the current structure and processes in all areas of UI. The initiatives helped IDOL develop a strategic plan for the reorganization of the UI Division that allowed for consistency in planning, training, & and UI delivery. The events of this year have proven that the initiatives undertaken at that time have been instrumental in allowing the department to implement the new programs required under the CARES Act. The modernized system has improved UI operations by

providing user-friendly graphical interfaces, significant automation, and real-time claim processing.

Idaho has reduced the number of field offices from 25 to 11 and provides remote services to more communities shifting focus to demand driven Employment Services and WIOA activities. Idaho continues to utilize lean processes to reduce inefficiencies and eliminate redundancies.

Due to the increase in unemployment insurance activity brought on by the pandemic, the department has significantly increased the number of UI staff.

2. Idaho's performance remains strong considering the continued reductions in base funding levels over the past years.

Idaho has met or exceeded most of the ALP's for all measures in tax, benefits, and appeals. Idaho ranks very high in first pay timeliness, effective audit measures, and lower authority appeals and is above the average in most other areas.

Idaho has six issues that are included in the 2021-2022 SQSP Corrective Action Plan(s). All of the issues are minor and the plans to correct the deficiencies are included in the 2020-2021 SQSP Quarterly Reporting Workbook.

In the area of Integrity, Idaho meets or exceeds all but one of the core measures. The core measure that has been a problem is the improper payment rate, which for 2019 is listed as 13.25%, a full 3.25% over the benchmark of 10%. During the second half of 2019, IDOL modified the work search criteria to include recommendations from both NASWA and USDOL. Because of those modifications, Idaho's improper payment rate for the year ending March 31, 2020, dropped to 8.9%. IDOL will continue making improvement in the areas that effect the improper payment rate.

Idaho was continuing to make progress on Data Validation but that work stopped with the advent of the CARES Act programs. Work on data validation will commence once programmatic changes stabilize.

The BAM population variances have undergone significant work over the past few years and for the most part are always in tolerance. We recently had one quarter get out of balance on the monetary and the corrective action is included in the CAP.

Idaho has met or exceeded all USDOL GPRA goals.

Idaho has used past supplemental budget requests to enhance IT security and to carry out many of the integrity efforts with respect to identity theft and fictitious employer schemes. Idaho will actively participate in the SBR process when funding is available. If Idaho is awarded funds in accordance with UIPL 28-20, in addition to staffing, Idaho will focus on increased integration between IDH and Idaho's fraud detection systems.

Due to the inclusive organizational structure of the Idaho Department of Labor, coordination within the department with other plans is a common practice. The department's Workforce Development Division administers the Employment Services and WIOA. UI Adjudication and Claims Processing has been consolidated with UI Compliance into one UI division. This change has allowed closer coordination between the RESEA and WIOA as field management staff is no longer required to oversee UI Functions. These changes continue to enhance Idaho's ability to meet the employment needs of the employer community. In addition, claimants are directed during the claims process to utilize the IDOL reemployment services offered in our 11 field offices located statewide.

The Idaho Department of Labor is the administrative entity for unemployment insurance, employment security and Labor Market Information and is also the WIOA Adult, Dislocated Worker and Youth service provider in each of the 11 One-Stop centers. Collaboration and

connectivity is inherent and will ensure claimant access to the full array of services. Career center staff have the skills to provide a comprehensive One-Stop service orientation and assessment and are able to provide claimants with the information, tools and technology to build quality work search and career development plans Idaho has exceeded the performance measure of 72% for Facilitating Reemployment with a score of 84.6%.

B. Federal Emphasis (GPRA)

1. Idaho has met all GPRA measures
   a. First Pay Promptness – 95.73%
   b. Detect Benefit Overpayments – 91.80%
   c. Establish Tax Accounts Promptly – 91.50%
2. Idaho will continue to provide adequate administration to achieve the GPRA goals and targets in FY2019-2020.

Program Review Deficiencies

a. Idaho did participate in program reviews during the prior period.
b. Idaho will continue to participate in the reviews when requested.

D. Program Deficiencies

Tax Quality Part A and B- There were two quality issues discovered in the last TPS audit. The deficiencies identified in the audit are in the areas of successor status and collections. Steps have been taken to correct the problems and they are outlined in the corrective action plan-reporting workbook.

E. Reporting Deficiencies

The ar227 report for the 2nd quarter 2020 is late – the changes required by the CARES Act require changes to the ETA227 report and work on this is underway. Idaho takes reporting seriously and we will strive to ensure timely submission of all reports.

F. Customer Service Surveys (optional)

The department has not completed formal customer service surveys this past performance year.

G. Other

The Idaho Unemployment Insurance Division has significantly streamlined initial claims processing as well as increasing the use of technology to enhance integrity efforts.

Idaho was one of the pilot states in the Suspicious Actor Repository project (SAR)/Integrity Data Hub and as of April of 2017, matches 100% of all new and continued claims against the Integrity Data Hub database.

Idaho participated as one of the pilot states in the UI Self-Assessment project and now that that project is complete, Idaho has completed the self-assessment and is now working on year two.

Idaho has no requests for technical assistance at this time.

H. Assurances:

The Idaho Department of Labor certifies we will comply with the assurances listed below:

a. Assurance of Equal Opportunity (EO).
b. Assurance of Administrative Requirements and Allowable Cost Standards.
c. Assurance of Management Systems, Reporting, and Recordkeeping.
d. Assurance of Program Quality.
e. Assurance on Use of Unobligated Funds.
f. Assurance of Prohibition of Lobbying Costs (29 CFR Part 93).
g. Drug Free Workplace (29 CFR Part 98).
h. Assurance of Contingency Planning:

Information Technology (IT) Contingency Plan Implemented: In March 2006, the Idaho Department of Labor published a major release of its Disaster Recovery Plan which is the basis for the plan in its current state.

IT Contingency Plan Reviewed/Updated: The plan is reviewed annually, particularly since the State of Idaho requires the Idaho Department of Labor to coordinate its contingency plan efforts with the Idaho Office of Emergency Management. The plan was reviewed and updated in March 2021 and will be reviewed annually again in March 2022.

IT Contingency Plan Tested: The Idaho Department of Labor's most recent test of contingency recovery procedures was conducted in June 2021. In addition, a tabletop training exercise is scheduled for November 2021.

The Idaho Department of Labor certifies the state will comply with the assurances listed below:

i. Assurance of Conformity and Compliance.

Idaho Department of Labor assures that it complies in all areas of Conformity and Compliance.

j. Assurance of Automated Information Systems Security.

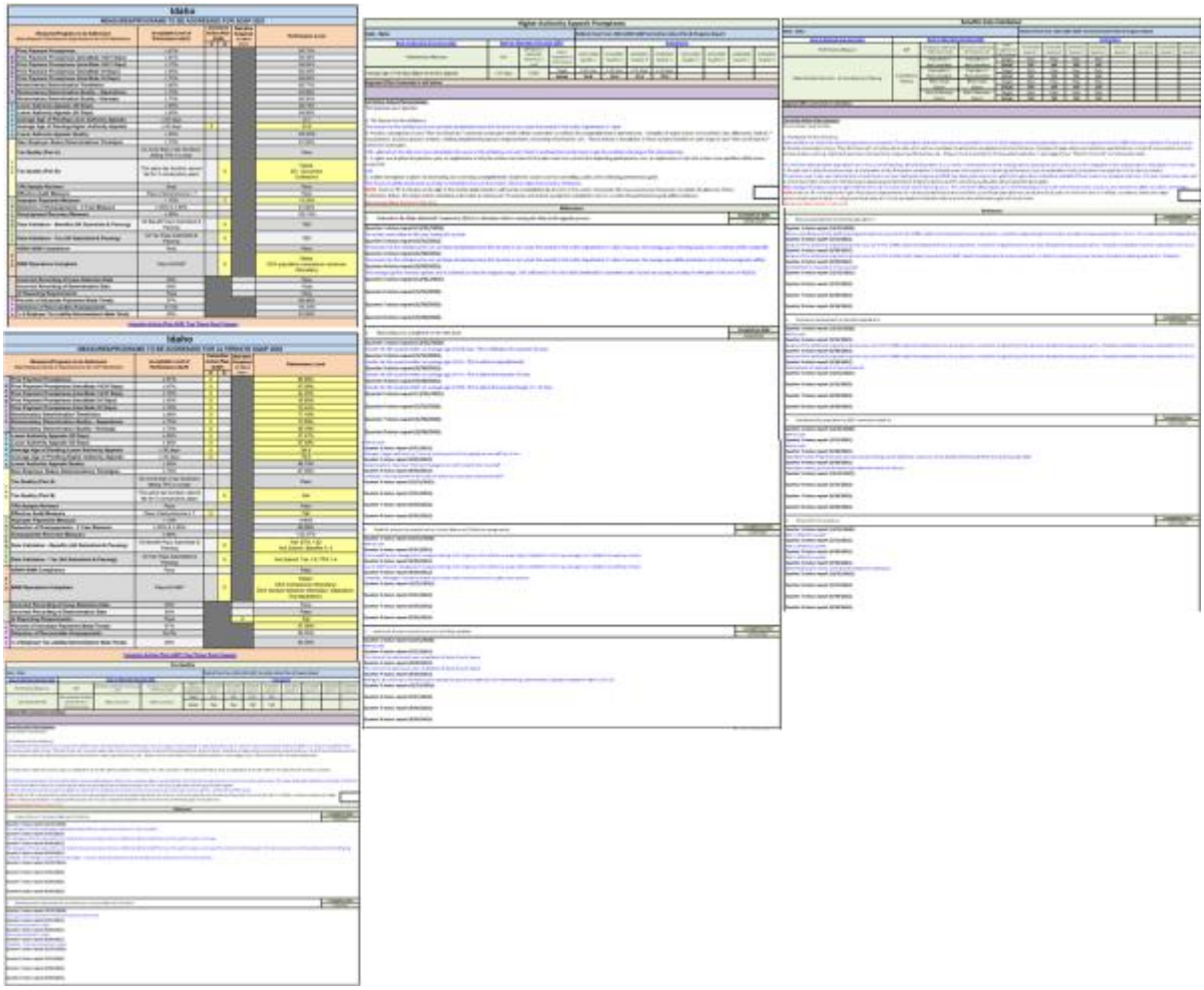
Idaho Department of Labor assures that it complies in all areas of Automated Information Systems Security.

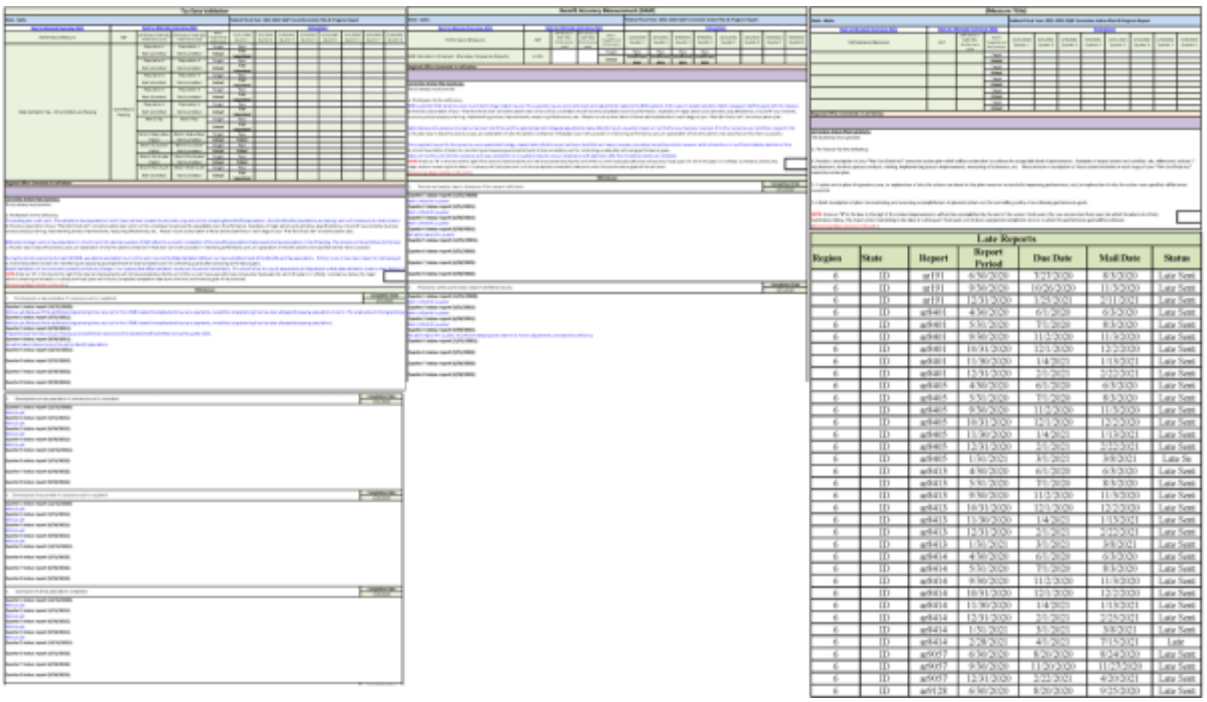
Risk Assessment Conducted: In October 2021, the Idaho Department of Labor began a qualitative and quantitative risk analysis. This is scheduled for completion in early 2022.

System Security Plan Reviewed/Updated: In August 2019, the Department of Treasury, Internal Revenue Service, Department of Safeguards, preformed their triennial IRS Publication 1075 audit of the Department during which a review of Risk Assessment and System Security Plan was conducted.

k. **The Idaho Department of Labor certifies we will comply with the Assurance of Confidentiality.**

4. CORRECTIVE ACTION PLANS (CAPS)





Late Reports						
Region	State	Report	Report Period	Due Date	Mail Date	Status
6	ID	ar191	6/30/2020	8/3/2020	Late Sent	
6	ID	ar191	9/30/2020	10/26/2020	11/3/2020	Late Sent
6	ID	ar191	10/31/2020	1/4/2021	2/10/2021	Late Sent
6	ID	ar8401	4/30/2020	6/1/2020	6/3/2020	Late Sent
6	ID	ar8401	5/31/2020	7/1/2020	8/3/2020	Late Sent
6	ID	ar8401	9/30/2020	11/2/2020	11/3/2020	Late Sent
6	ID	ar8401	10/31/2020	12/1/2020	12/2/2020	Late Sent
6	ID	ar8401	11/30/2020	1/4/2021	1/13/2021	Late Sent
6	ID	ar8401	12/31/2020	2/1/2021	2/22/2021	Late Sent
6	ID	ar8405	4/30/2020	6/1/2020	6/3/2020	Late Sent
6	ID	ar8405	5/31/2020	7/1/2020	8/3/2020	Late Sent
6	ID	ar8405	9/30/2020	11/2/2020	11/3/2020	Late Sent
6	ID	ar8405	10/31/2020	12/1/2020	12/2/2020	Late Sent
6	ID	ar8405	11/30/2020	1/4/2021	1/13/2021	Late Sent
6	ID	ar8405	12/31/2020	2/1/2021	2/22/2021	Late Sent
6	ID	ar8405	1/31/2021	3/1/2021	3/8/2021	Late Sent
6	ID	ar8413	4/30/2020	6/1/2020	6/3/2020	Late Sent
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6	ID	ar8413	10/31/2020	12/1/2020	12/2/2020	Late Sent
6	ID	ar8413	11/30/2020	1/4/2021	1/13/2021	Late Sent
6	ID	ar8413	12/31/2020	2/1/2021	2/22/2021	Late Sent
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6	ID	ar8414	4/30/2020	6/1/2020	6/3/2020	Late Sent
6	ID	ar8414	5/31/2020	7/1/2020	8/3/2020	Late Sent
6	ID	ar8414	9/30/2020	11/2/2020	11/3/2020	Late Sent
6	ID	ar8414	10/31/2020	12/1/2020	12/2/2020	Late Sent
6	ID	ar8414	11/30/2020	1/4/2021	1/13/2021	Late Sent
6	ID	ar8414	12/31/2020	2/1/2021	2/25/2021	Late Sent
6	ID	ar8414	1/31/2021	3/1/2021	3/8/2021	Late Sent
6	ID	ar8414	2/28/2021	4/1/2021	5/3/2021	Late
6	ID	ar8417	6/30/2020	8/29/2020	9/24/2020	Late Sent
6	ID	ar8417	9/30/2020	11/29/2020	11/30/2020	Late Sent
6	ID	ar8417	12/31/2020	2/27/2021	4/20/2021	Late Sent
6	ID	ar8428	6/30/2020	8/29/2020	9/25/2020	Late Sent

5. UI PROGRAM INTEGRITY ACTION PLAN (UI IAP)

Alternate UI Integrity Action Plan (IAP)

Back to Biennial Overview 2021 | Back to Alternate Overview 2022

State	Federal Fiscal Year	Accountable Agency Official(s):	
Idaho	2022	*(Enter the name and title of the staff person who is accountable for reducing UI improper payments.)*	
	Top Three Root Causes (Calendar Year 2020) https://www.dol.gov/general/maps/state	**Calendar Year 2019 (% of $ Overpaid)**	**Calendar Year 2020 (% of $ Overpaid)**
Root Cause #1:	Benefit Year Earnings	23.98%	49.45%
Root Cause #2:	Separation Issues	4.51%	15.96%
Root Cause #3:	Other Eligibility	0.00%	10.61%
	National Priority Strategies (Note: If these areas are addressed in the top 3 root causes, there is no need for duplication)		
Work Search			
SIDES			
Integrity Data Hub			
	Additional Strategies		
CARES Act Strategies			
High $ OP Strategies			

Summary: Provide a detailed summary of the plan that the state has designed. The summary should include outreach efforts planned by the agency to inform all UI and workforce staff, and employers of the strategic plan to ensure everyone understands the importance of maintaining program integrity.

The Idaho Department of Labor (IDOL) takes program integrity very seriously and constantly seeks to make improvements in all functional areas of UI. IDOL has working diligently towards getting the improper payment rate numbers below the ceiling established by the Act. The three areas addressed by the Integrity Action Plan (IAP) are benefit year earnings, separation issues, and eligibility issues excluding work search. IDOL's plan is to continue using a focus group to study each of the 'Top Three Root Causes' to identify solutions we can implement to reduce the improper payments in each category. If the solutions recommended by the focus groups are viable and resources are available, those recommendations will be implemented. IDOL has implemented many recommendations from both NASWA and USDOL regarding the Improper Payment Rate, and as those changes take effect, we will see an improvement in performance. Both SIDES and the Integrity Data Hub are integrated into IDOL processes.

Instructions for the following section: In each individual section below, enter a Root Cause, from above, and the top three focused Strategies that will be employed to correct or reduce this cause of overpayments. An additional line is available in each section to include other significant strategies that target the root cause.

Root Cause #1: Benefit Year Earnings

Strategies	Actions	Targets & Milestones	Resources
1. Focus Group	IDOL's UI Integrity Focus Group, that meets quarterly, will determine if there are additional methods to reduce the improper payment rate with respect to Benefit Year Earnings. Make recommendations to management.		UI Staff/BAM Staff
2. Management Review	Management will review the Focus Group's recommendations and if the recommendations are viable, develop a plan for implementation.		UI Management
3. Outreach	Outreach to UI Staff to discuss the Benefit Year Earnings (BYE) issue and provide guidance.		UI Staff
Additional:			

Six-Month (October-March) Update: Please provide a detailed update on the integrity strategies identified for the above root cause, including information on any changes in strategies, delays, positive outcomes, and identified successes.

Root Cause #2: Separation Issues

Strategies	Actions	Targets & Milestones	Resources
1. Focus Group	IDOL's UI Integrity Focus Group, that meets quarterly, will determine if there are additional methods to reduce the improper payment rate with respect to Work Search. Make recommendations to management.		UI Staff/BAM Staff
2. Management Review	Management will review the Focus Group's recommendations and if the recommendations are viable, develop a plan for implementation.		UI Management
3. Outreach	Outreach to UI and Workforce Staff to discuss the work search issue and provide guidance.		UI Staff/Workforce Staff
Additional:			

Six-Month (October-March) Update: Please provide a detailed update on the integrity strategies identified for the above root cause, including information on any changes in strategies, delays, positive outcomes, and identified successes.

Root Cause #3: Other Eligibility

Strategies	Actions	Targets and Milestones	Resources
1. Focus Group	IDOL's UI Integrity Focus Group, that meets quarterly, will determine if there are additional methods to reduce the improper payment rate with respect to Eligibility Issues Excluding Work Search. Make recommendations to management.		UI Staff/BAM Staff
2. Management Review	Management will review the Focus Group's recommendations and if the recommendations are viable, develop a plan for implementation.		UI Management
3. Outreach	Outreach to UI Staff to discuss the Eligibility Issues other than Work Search and provide guidance.		UI Staff
Additional:			

Six-Month (October-March) Update: Please provide a detailed update on the integrity strategies identified for the above root cause, including information on any changes in strategies, delays, positive outcomes, and identified successes.

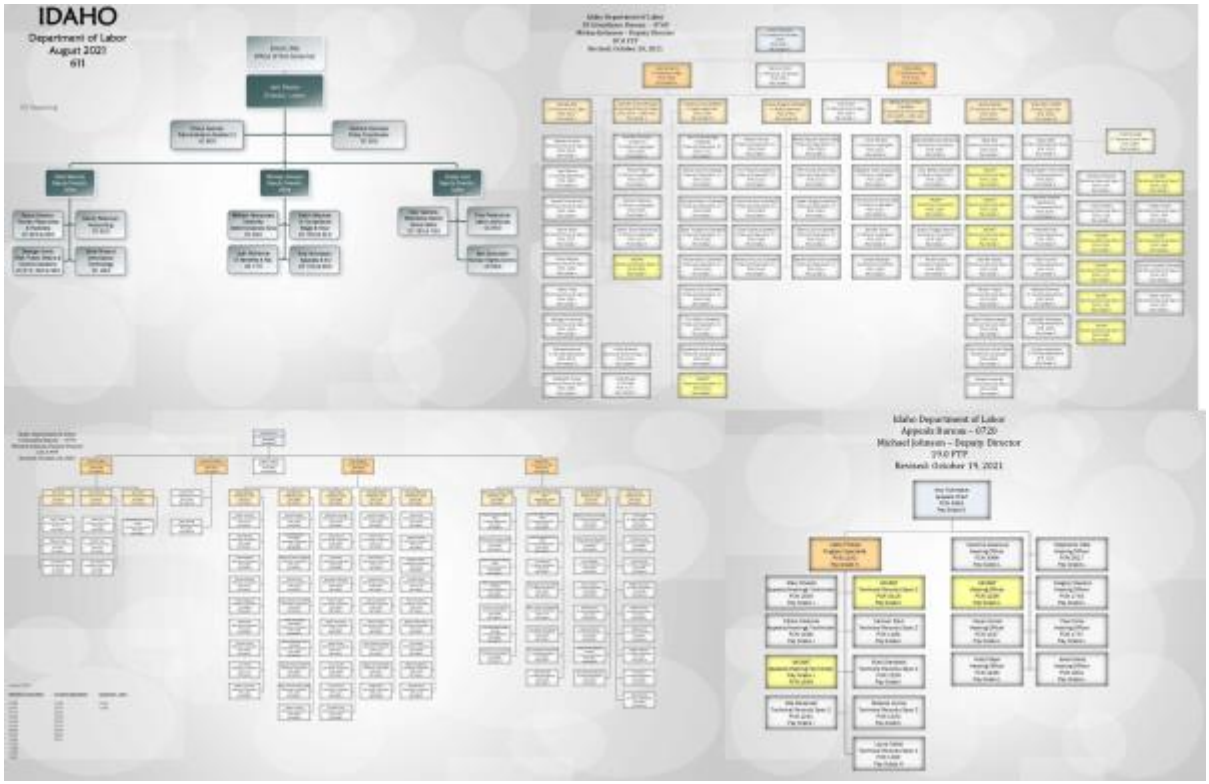
Work Search Strategies

Strategies	Actions	Targets and Milestones	Resources
1. Technology	Claimants utilize online systems to report work search activities		UI Staff/IT Staff
2. Education/Messaging	Educate claimants on adequate work search documentation and requirements		UI Staff/Customers
3. Verification	Conduct re-employment interviews and verifications of work search activities as reported by the claimant		UI Staff/Customers
Additional:			

Six-Month (October-March) Update: Please provide a detailed update on the integrity strategies identified for the above root cause, including information on any changes in strategies, delays, positive outcomes, and identified successes.

SIDES Strategies			
Strategies	Actions	Targets and Milestones	Resources
Integrated into IDOL processes			
Additional:			
Six-Month (October-March) Update: Please provide a detailed update on the integrity strategies identified for the above root cause, including information on any changes in strategies, delays, positive outcomes, and identified successes.			
Integrity Data Hub Strategies			
Strategies	Actions	Targets and Milestones	Resources
Integrated into IDOL processes			
Additional:			
Six-Month (October-March) Update: Please provide a detailed update on the integrity strategies identified for the above root cause, including information on any changes in strategies, delays, positive outcomes, and identified successes.			
Cares Act Strategies			
Strategies	Actions	Targets and Milestones	Resources
1. Administration	Continue to train new staff on program changes as required		UI Staff/IT Staff
2. Training/Messaging	Train all UI Staff on any program changes updates, inform public		UI Staff/Customers
3. Reporting	Refine reporting mechanism for the new programs		UI Staff/Research & Analysis
Additional:			
Six-Month (October-March) Update: Please provide a detailed update on the integrity strategies identified for the above root cause, including information on any changes in strategies, delays, positive outcomes, and identified successes.			
High $ OP Strategies			
Strategies	Actions	Targets and Milestones	Resources
1. Collection Priority	High dollar overpayment will be a collection priority		UI Staff
2. Treasury Offset Program	High dollar overpayment will be included in TOP if appropriate		UI Staff
3. Analyze Causes for Overpayment	Determine causes of high dollar overpayments and develop plan to minimize		UI Staff
Additional:			
Six-Month (October-March) Update: Please provide a detailed update on the integrity strategies identified for the above root cause, including information on any changes in strategies, delays, positive outcomes, and identified successes.			

6. ORGANIZATIONAL CHART



7. SQSP SIGNATURE PAGE

U.S. Department of Labor
SQSP SIGNATURE PAGE

OMB Control No.: 1205-0132 Expiration Date: 02/29/2024

U.S. DEPARTMENT OF LABOR Employment and Training Administration	FEDERAL FISCAL YEAR FY 2021-2022	STATE IDAHO

UNEMPLOYMENT INSURANCE
STATE QUALITY SERVICE PLAN
SIGNATURE PAGE

This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the Department of Labor, Employment and Training Administration, and

IDAHO DEPARTMENT OF LABOR
(NAME OF STATE AGENCY)

The Unemployment Insurance SQSP is part of the State's overall operating plan and, during this Federal fiscal year, the State agency will adhere to and carry out the standards set forth in Federal UI Law as interpreted by the DOL, and adhere to the Federal requirements related to the use of granted funds.

All work performed under this agreement will be in accordance with the assurances and descriptions of activities as identified in the SQSP Handbook and will be subject to its terms.

TYPED NAME AND TITLE	SIGNATURE	DATE
Jani Revier **STATE ADMINISTRATOR (print name)**		October 28, 2021
DOL – REGIONAL OFFICE APPROVING OFFICIAL (print name)		
DOL – NATIONAL OFFICE APPROVING OFFICIAL (print name) (if required)		

B. REQUIREMENTS FOR STATES ELECTING TO INCLUDE UI IN THE COMBINED STATE PLAN

1. SUBMIT AN SQSP IN THE FOLLOWING MANNER DEPENDING ON THEIR TIMING IN THE SQSP CYCLE:

A. IF A STATE IS IN THE FIRST YEAR OF THEIR 2-YEAR CYCLE, THE STATE IS REQUIRED TO SUBMIT THE MOST RECENTLY APPROVED COMPLETE SQSP PACKAGE. A COMPLETE SQSP

PACKAGE WILL INCLUDE THE TRANSMITTAL LETTER, BUDGET WORKSHEETS/FORMS, STATE PLAN NARRATIVE, CAPS (INCLUDING THE MILESTONES AND THE COMPLETION DATE FOR EACH MILESTONE), THE UI IAP, ORGANIZATIONAL CHART, AND THE SQSP SIGNATURE PAGE. ONE OF THE KEY GOALS FOR THE UI PROGRAM IS TO ENSURE THAT CLAIMANTS ARE ABLE TO SUCCESSFULLY RETURN TO WORK. AS SUCH, THE SQSP STATE PLAN NARRATIVE MUST PROVIDE A DISCUSSION OF THE PLAN COORDINATION WITH OTHER WIOA COMBINED PLAN PROGRAMS TO ENSURE A COORDINATED EFFORT AND INTEGRATED SERVICE DELIVERY.

Idaho is in the second year of the 2-year cycle as such the required documents are submitted in the appropriate sections.

B. IF A STATE IS IN THE SECOND YEAR OF THE 2-YEAR CYCLE, THE STATE IS REQUIRED TO SUBMIT THE MOST RECENTLY APPROVED COMPLETE SQSP PACKAGE WITH A MODIFICATION THAT MUST INCLUDE THE TRANSMITTAL LETTER, BUDGET WORKSHEETS/FORMS, ORGANIZATIONAL CHART, AND THE SQSP SIGNATURE PAGE. THE MODIFICATION MAY ALSO INCLUDE CAPS FOR NEW IDENTIFIED PERFORMANCE DEFICIENCIES, AND ANY REQUIRED MODIFICATIONS TO EXISTING CAPS. THE CAP MUST LIST BOTH SPECIFIC MILESTONES FOR KEY CORRECTIVE ACTIONS OR IMPROVEMENT ACTIVITIES, AND THE COMPLETION DATE FOR EACH MILESTONE.

Idaho is in the second year of the 2-year cycle as such the required documents are submitted in the appropriate sections.

2. SUBMIT THE REQUIRED OFF-YEAR SQSP COMPONENTS AS A MODIFICATION TO THE COMBINED STATE PLAN ON THE SAME CYCLE AS THE REGULAR SQSP PROCESS WHICH MUST BE APPROVED BY SEPTEMBER 30TH EACH YEAR

Idaho is in the second year of the 2-year cycle as such the required documents are submitted in the appropriate sections.

SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)

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.)

The ICOA's long term senior employment strategies focus on the Workforce Development Council's four main industry sectors: [RB1] . Below is the number of jobs per targeted industry and the growth over the past six years.

SCSEP Table 1: Workforce Development Council's Target Industries

WDC Target Industries	2015	2016	2017	2018	2019	2020	Growth
Advanced Manufacturing	61,577	63,769	66,056	67,792	68,409	67,700	9.94%
Aerospace	995	1,039	1,180	1,450	1,455	1,357	36.38%
Food Processing	16,809	17,452	18,571	18,808	19,198	19,159	13.98%
Health Care	85,512	87,936	89,348	92,999	97,621	98,712	15.44%

Source: Idaho Department of Labor, Quarterly Census of Employment & Wages 2010- 2016

The occupations identified as high demand provide the data needed for ICOA and Easterseals-Goodwill to develop and recruit specific organizations to consider employing individuals 55+. The Top Ten High-Demand Occupations by annual openings is identified below.

SCSEP Table 2: Top Ten High-Demand Occupations by Annual Openings

Occupation	2020 Employment	2030 Projected Employment	Total Annual Openings*	Median Hourly Wage
Retail Salespersons	25,032	27,128	5,576	$14.88
Cashiers	17,708	18,545	4,673	$11.87
Waiter and Waitresses	12,576	14,730	4,044	$11.41
Customer Service Representatives	18,409	20,478	3,935	$15.98
Food Preparation and Serving Workers, Including fast Food	14,803	17,243	4,595	$10.27
Farmers, Ranchers, and Other Agricultural Managers	8,828	9,971	1,282	$31.12
Office Clerks, General	18,336	21,206	3,524	$13,70
General and Operations Managers	14,152	16,331	2,172	$40.85
Registered Nurses	15,352	18,402	1,465	$34.44
Heavy and Tractor-Trailer Truck Drivers	14,440	15,403	2,493	$21.30

** Annual Openings include openings due to growth and replacement needs*

SOURCE: Idaho Department of Labor: lmi.idaho.gov/occupations-in-demand (data extracted on January 10, 2022)

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))

SCSEP Table 3: High Demand Jobs and Active Training Host Sites

Host Agency Types	Number of Active Sites	High Demand Skill Sets
Social Assistance	11	Customer Service Representatives, Office Clerks, Administrative Assistants
Stores	3	Customer Service Representatives, Office Clerks, Administrative Assistants, Maintenance and Repair Workers
Meal Sites/Food Banks	1	Customer Service Representatives, Office Clerks,

Host Agency Types	Number of Active Sites	High Demand Skill Sets
		Administrative Assistants
Senior Center	5	Customer Service Representatives, Office Clerks, Administrative Assistants

Source: SPARQs SCSEP Reporting System

In addition, SCSEP participants have access to online training certifications for Customer Service Representative, Essential Entry-Level Workplace and Clerical Skills, Supervisor/Manager, Essential Entry-Level Work Skills, Essential Medical Office Skills, Administrative Assistant, and Sales Representative.

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))

In the table below, ICOA utilized the Wagner-Peyser Act statistical information to identify projected senior employment opportunities for the targeted occupation based on senior education level. ICOA's SCSEP contractor provides seniors with training to compete in the marketplace for these occupations.

TABLE 4 Targeted Occupations	2024 Projected Employment	Annual Openings*	Wage	Education	Senior Education 65+
Retail Sales Person	26,814	1,221	$11.04	LHS	29,020
Cashier	16,825	820	$9.36	LHS	29,020
Waiter and Waitress	13,145	757	$8.90	LHS	29,020
Customer Service Representative	19,646	738	$13.71	HDE	71,167
Combined Food Preparation and Serving Workers, Including fast Food	14,538	704	$8.92	LHS	29,020
Farmers, Ranchers, and Other Agricultural Managers	17,983	607	$28.72	HDE	71,167
Office Clerks, General	17,409	558	$13.70	HDE	71,167
General and Operations Manager	14,244	556	$31.53	BD	34,808

TABLE 4 Targeted Occupations	2024 Projected Employment	Annual Openings*	Wage	Education	Senior Education 65+
Registered Nurses	14,357	524	$29.90	BD	71,167
Heavy and Tractor-Trailer truck Drivers	16,322	508	$18.33	PHDA	71,167

2012-2016 American Community Survey 5-year Estimates - Table B15001. No formal educational credential includes two groups: less then 9th grade and 9th to 12th grade, no diploma. Note: Education level data from Bureau of Labor Statistics. Source: 2014-2024 Occupational & Industry Projections Released November 2016, Idaho Department of Labor, Communications & Research. Source: 2012-2016 American Community Survey 5-year Estimates released December 7, 2017, February 15, 2018.

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))

Strategy: ICOA collaborated with one-stop partners to develop a Memorandum of Understanding outlining roles and responsibilities.

Planned Actions:

- This Memorandum of Understanding includes referral information between SCSEP, the Idaho Department of Labor, the Idaho Division of Vocational Rehabilitation, the Idaho Commission for the Blind and Visually Impaired, the Idaho Division of Career and Technical Education, and the Department of Health and Welfare.
- IDOL will plan to provide Adult and Dislocated Worker Program training to ICOA's SCSEP contractor.
- ICOA will build the agreement roles and responsibilities into statewide contractor reviews.

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))

Strategy: ICOA will continue coordinating employment resource sharing between ICOA's SCSEP contractor and the Area Agencies on Aging's (AAAs).

Planned Actions:

- SCSEP participants have the opportunity to participate in services and/or gain information available through their local AAA`s such as administrative assistants, food service, health care, housing, recreation, and social service agencies. SCSEP Employment Specialists can meet with the AAA directors in each of ICOA's six planning and service areas.

- ICOA`s SCSEP contractor will provide eligibility training and establish referral protocols with the AAAs and coordinate regional resources and outreach activities. Training can be conducted by ICOA and/or ESGW staff.

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))

Strategy (Private Agencies): ICOA will coordinate information sharing with the following WIOA Advisory Groups for resource sharing and outreach via phone, email, and/or in-person meetings:

- Title I - Adult, Dislocated, and Youth Programs
- Title II - Adult Education and Family Literacy Programs
- Title III - Wagner-Peyser/Employment Services
- Title IV-Vocational Rehabilitation
- Vocational Rehabilitation Services in Idaho are provided through two agencies: The Idaho Division of Vocational Rehabilitation and the Idaho Commission for the Blind and Visually Impaired
- Combined Plan Partner - Jobs for Veterans State Grant Program
- Combined Plan Partner - Trade Adjustment Program
- One-Stop Partner - Unemployment Insurance
- One-Stop Partner - Carl D Perkins and Career-Technical Education
- One-Stop Partner - Community Development Block Grant
- One-Stop Partner - TANF & SNAP
- One-Stop Partner - Idaho Commission for the Libraries

Additional collaboration will be coordinated with ICOA's stakeholders such as, but not limited to: senior meal sites, home delivered meal services, tribal leaders, Commodity Supplemental Food Program (CSFP) partners, and other AAA-contracted programs

Planned Actions:

- ICOA will plan to collaborate with WIOA Advisory Group partners to share information about the SCSEP program within their internal and external stakeholders
- ICOA connected the Employment Specialists with the six AAAs to do presentations for their providers, including their three Tribes in Idaho. ICOA will continue connecting the Employment Specialists with all contracted meal sites in Idaho. ICOA provided annual training to senior meal site coordinators about SCSEP and the potential of senior meal sites to act as host agencies. This collaboration has the potential to establish additional host agencies and attract more participants.
- ICOA`s SCSEP contractor will provide training and establish referral protocols with all WIOA partners and the Centers for Independent Living. This training will focus on referral coordination and meeting participants' supportive service needs, such as, transportation, caregiver support, congregate meals and health promotions.

D. PLANNED ACTIONS TO COORDINATE SCSEP WITH OTHER LABOR MARKET AND JOB TRAINING INITIATIVES. (20 CFR 641.302(J))

Strategy: Through collaboration with the State WIOA Advisory Group (IDOL, Division of Career-Technical Education, Vocational Rehabilitation, Commission for the Blind and Visually Impaired and ICOA), ICOA will promote job training initiatives through ICOA's SCSEP contractor, the Area Agencies on Aging and the Centers for Independent Living.

Planned Actions:

- ICOA will continue participating in the quarterly State WIOA Advisory Group meetings to ensure strategies are being implemented throughout Idaho.
- ICOA will distribute job training initiatives to local ICOA's SCSEP contractor offices, Area Agencies on Aging and Centers for Independent Living for implementation.

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)

Strategy: ICOA has worked with the Idaho Department of Labor to develop a standardized Memorandum of Understanding between state organizations and contracted providers.

Planned Actions:

- As needed, ICOA will continue to work with partners to standardize requirements to be incorporated into regional and local Memorandums of Understanding.

F. EFFORTS TO WORK WITH LOCAL ECONOMIC DEVELOPMENT OFFICES IN RURAL LOCATIONS.

Strategy: ICOA's SCSEP contractor will conduct SCSEP outreach to economic development offices located in rural counties with persistent underemployment.

Planned Actions:

ICOA`s SCSEP contractor will provide SCSEP outreach to local economic development offices in rural counties with persistent underemployment: Bonneville, Boundary, Cassia, Clearwater, Elmore, Franklin, Fremont, Jefferson, Jerome, Kootenai, Lemhi, Minidoka, Nez Perce.

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.)

Strategy: Out of the four Workforce Development Council targeted industries (Advanced Manufacturing, High Tech, Health Care, and Power & Energy), ICOA will focus on increasing the two highest growth sectors - Health Care and Advanced Manufacturing.

Planned Actions:

ICOA's SCSEP contractor will recruit nonprofit Health Care and Advanced Manufacturing organizations to participate as Host Agencies and/or prospective employers and prepare participants to compete for these job positions.

3. THE STATE'S LONG-TERM STRATEGY FOR SERVING MINORITY OLDER INDIVIDUALS UNDER SCSEP. (20 CFR 641.302 (C))

Strategy: ICOA evaluates SCSEP labor and management reports and develops strategies to increase minority participation.

Planned Actions:

o ICOA will work with regional one-stop offices and ICOA's SCSEP contractor to address low minority participation as identified in the SCSEP management and USDOL's SCSEP State minority reports.

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)

Strategy: ICOA will develop strategies connecting individuals who are most in need with community services in the Targeted Industry.

Planned Actions:

o ICOA's SCSEP contractor will identify non-profit/governmental Host Agencies to provide individuals, who qualified for the SCSEP program, the training needed to compete for jobs in the Workforce Development Council Targeted Industries. The target locations are those counties that are not meeting equitable distribution level as identified in SCSEP Table 8.

SCSEP Table 5: Community Job Service Needs

Non-profit or Governmental Host Agencies that meet community service training needs	Targeted Industries
Warehouses (shipping and receiving), Thrift stores, Correctional Industries, Restore, Habitat for Humanity	Advanced Manufacturing
Technical Businesses, Universities, City, County and State Governments	High Tech
Hospitals, Home Health Companies Doctor Offices, non-profit clinics (i.e. Terry Reilly)	Health Care
Utility Organizations	Power and Energy

5. THE STATE'S LONG-TERM STRATEGY TO IMPROVE SCSEP SERVICES, INCLUDING PLANNED LONG-TERM CHANGES TO THE DESIGN OF THE PROGRAM WITHIN THE STATE, AND PLANNED CHANGES IN THE USE OF SCSEP GRANTEES AND PROGRAM OPERATORS TO BETTER ACHIEVE THE GOALS OF THE PROGRAM. THIS MAY INCLUDE RECOMMENDATIONS TO THE DEPARTMENT AS APPROPRIATE. (20 CFR 641.302(K))

Strategy: Participate with WIOA partners to align the SCSEP vision and mission with other agencies employment strategies.

Planned Actions:

As part of the WIOA's State Plan Advisory Group, ICOA will coordinate SCSEP efforts with one-stop offices, develop on the job experience policy, coordinate statewide SCSEP resource training, promote job training initiatives, provide outreach to economic development offices, focus skill development on high job growth sectors, increase minority participation, and target service needs.

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))

Strategy: ICOA works closely with the SCSEP contractor to meet or exceed "Employment Rate – 2nd Quarter after Exit" and "Employment Rate – 4th Quarter after Exit" levels. In program years 2018 and 2019, ICOA achieved the following rates:

PY 2018:

- Employment Rate – 2nd Quarter after Exit: 19.0%
- Employment Rate – 4th Quarter after Exit: 13.0%

PY 2019

- Employment Rate – 2nd Quarter after Exit: 21.7%
- Employment Rate – 4th Quarter after Exit: 13.6%

Planned Action:

- ICOA monitors the SCSEP contractor quarterly and develops strategies to meet USDOL's annual goals.

SCSEP Table 7: Performance Measure

Program Year	PY 18	PY 18	PY 19	PY 19
Performance Measure	**Goal/Target**	**Performance**	**Goal/Target**	**Performance**
Common Measures Employment Rate – 2nd Quarter after Exit	33.5%	19.0%	31.5%	21.7%
Common Measures Employment Rate – 4th Quarter after Exit	32.1%	13.0%	26.0%	13.6%

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))

Strategy: ICOA's SCSEP contractor will meet the Equitable Distribution levels set by USDOL.

Planned Action: ICOA uses the USDOLS`s Equitable Distribution level and determines the underserved areas to be targeted by the SCSEP contractor. Currently there are 14 counties that are underserved and 4 counties that are overserved.

SCSEP Table 8: SCSEP Authorized Positions by County

Urban and Rural Counties	2020 Authorized Positions	2021 Authorized Positions	2021 Current Under Served (1 Quarter)	2021 Current Over Served (1 Quarter)
ADA (U)	3	3	0	2
ADAMS (R)	0	0	0	0

Urban and Rural Counties	2020 Authorized Positions	2021 Authorized Positions	2021 Current Under Served (1 Quarter)	2021 Current Over Served (1 Quarter)
BANNOCK (U)	0	0	0	0
BEAR LAKE (R)	0	0	0	0
BENEWAH (U)	0	0	0	0
BINGHAM (R)	0	0	0	0
BLAINE	0	0	0	0
BOISE (R)	0	0	0	0
BONNER (R)	2	2	0	0
BONNEVILLE (U)	2	2	-2	0
BOUNDARY (R)	1	1	-1	0
BUTTE (R)	0	0	0	0
CAMAS (R)	0	0	0	0
CANYON (U)	4	4	0	0
CARIBOU (R)	0	0	0	0
CASSIA (R)	1	1	-1	0
CLARK (R)	0	0	0	0
CLEARWATER (R)	1	2	-1	0
CUSTER (R)	0	0	0	0
ELMORE (R)	1	1	-1	0
FRANKLIN (R)	1	1	-1	0
FREMONT (R)	1	1	-1	0
GEM (R)	1	1	0	0
GOODING (R)	1	1	0	0
IDAHO (R)	0	0	0	0
JEFFERSON (R)	1	2	-2	0
JEROME (R)	2	2	-2	0
KOOTENAI (U)	1	1	-1	0
LATAH (U)	1	1	0	0
LEMHI (R)	1	1	-1	0
LEWIS (R)	0	0	0	0

Urban and Rural Counties	2020 Authorized Positions	2021 Authorized Positions	2021 Current Under Served (1 Quarter)	2021 Current Over Served (1 Quarter)
LINCOLN (R)	0	0	0	0
MADISON (U)	0	0	0	0
MINIDOKA (R)	2	3	-3	0
NEZ PERCE (U)	1	1	-1	0
ONEIDA (R)	1	0	0	0
OWYHEE (R)	2	2	0	1
PAYETTE (R)	4	4	-2	0
POWER (R)	0	0	0	0
SHOSHONE (R)	1	2	0	1
TETON (R)	0	0	0	0
TWIN FALLS (U)	2	2	0	6
VALLEY (R)	1	1	0	0
WASHINGTON (R)	2	2	0	0

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.

Strategy: ICOA implements the SCSEP program in the 27 counties in Idaho to meet the USDOL's required Equitable Distribution levels. The bolded numbers above indicate where the positions changed from their prior year.

Planned Action:

- ICOA uses data from www.scseped.org (shown in SCSEP Table 8) to identify changes in performance and areas that are underserved or have no positions.

3. DESCRIBE CURRENT SLOT IMBALANCES AND PROPOSED STEPS TO CORRECT INEQUITIES TO ACHIEVE EQUITABLE DISTRIBUTION.

Strategy: ICOA will continue adhering to the developed policy to meet the USDOL's equitable distribution level and focus on increasing enrollment in the underserved areas.

Planned Action:

- Adhere to SCSEP policy that sets maximum participation levels and transition from overenrolled areas to underserved.
- The Policy has been submitted with the PY2018 grant and incorporated into the SCSEP contract.
- ICOA will work closely with the current national SCSEP grantee, Easterseals-Goodwill, to negotiate swaps for participant slots, if needed.

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.

Strategy: ICOA will analyze the state equitable distribution to determine the need to move authorized positions from the state to the federal program or vice versa.

Planned Action:

For those ICOA areas that are over or underserved, ICOA would work with the federal contractor to determine if a position transfer would allow both programs to meet USDOL's goals.

B. EQUITABLY SERVES RURAL AND URBAN AREAS.

Strategy: ICOA will ensure rural and urban counties are served equitably.

Planned Action:

- The ICOA will require the SCSEP contractor to follow and meet the equitable distribution formula released by the USDOL.
- The SCSEP contractor will conduct outreach to eligible host agencies that reside in rural areas to address underserved rural areas.

C. SERVES INDIVIDUALS AFFORDED PRIORITY FOR SERVICE UNDER 20 CFR 641.520. (20 CFR 641.302(A), 641.365, 641.520)

Strategy: The ICOA requires the SCSEP contractor to follow the service rule priority.

Planned Action:

- ICOA will monitor priority of service (65 Years of age or older, Disabled, Limited English proficiency or low literacy skills, Resides in a rural area, Veteran, Low employment prospects, Failed to find employment, Homeless or at risk of homelessness) through quarterly progress reports.

5. THE RATIO OF ELIGIBLE INDIVIDUALS IN EACH SERVICE AREA TO THE TOTAL ELIGIBLE POPULATION IN THE STATE. (20 CFR 641.325(A))

The Idaho counties and "Ratio of Eligible Individuals" (55 years old and over and below 125% poverty) are listed in SCSEP Table 9: Relative Distribution of Eligible Individuals.

SCSEP Table 9: Relative Distribution of Eligible Individuals

Urban and Rural Counties	Population of Individuals 55+	Ratio of Eligible State Population (est. 508,046)	Greatest Economic Need	Minorities	Limited English Proficient	Greatest Social Need
Ada (U)	118,760	23.38%	6,395	33,350	2,691	1,552
Adams (R)	2,061	0.41%	130	N/A	5	N/A
Bannock (U)	21,774	4.29%	1,488	1,694	445	345
Bear Lake (R)	2,030	0.40%	103	N/A	17	N/A
Benewah (U)	3,589	0.71%	221	N/A	20	N/A
Bingham (R)	11,736	2.31%	694	7,197	286	N/A

Urban and Rural Counties	Population of Individuals 55+	Ratio of Eligible State Population (est. 508,046)	Greatest Economic Need	Minorities	Limited English Proficient	Greatest Social Need
Blaine (R)	7,698	1.52%	341	N/A	457	N/A
Boise (R)	3,505	0.69%	192	N/A	5	N/A
Bonner (R)	18,027	3.55%	1,406	2,050	46	N/A
Bonneville (U)	27,177	5.35%	1,426	10,181	599	N/A
Boundary (R)	4,378	0.86%	300	N/A	0	N/A
Butte (R)	1,035	0.20%	51	N/A	1	N/A
Camas (R)	411	0.08%	48	N/A	8	N/A
Canyon (U)	52,290	10.29%	3,259	39,392	2,036	1,263
Caribou (R)	2,051	0.40%	67	N/A	44	N/A
Cassia (R)	5,891	1.16%	221	N/A	433	N/A
Clark (R)	215	0.04%	4	N/A	78	N/A
Clearwater (R)	3,790	0.75%	215	N/A	19	N/A
Custer (R)	1,979	0.39%	103	N/A	9	N/A
Elmore (R)	6,518	1.28%	534	N/A	339	N/A
Franklin (R)	3,389	0.67%	116	N/A	54	N/A
Fremont (R)	3,859	0.76%	145	N/A	147	N/A
Gem (R)	6,352	1.25%	435	N/A	233	N/A
Gooding (R)	4,452	0.88%	221	N/A	305	N/A
Idaho (R)	7,229	1.42%	569	N/A	51	N/A
Jefferson (R)	6,246	1.23%	209	N/A	174	N/A
Jerome (R)	5,685	1.12%	353	N/A	800	N/A
Kootenai (U)	50,603	9.96%	2,174	8,338	456	814
Latah (U)	9,377	1.85%	431	1,620	78	N/A
Lemhi (R)	3,674	0.72%	268	N/A	18	N/A
Lewis (R)	1,613	0.32%	164	N/A	8	N/A
Lincoln (R)	1,340	0.26%	111	N/A	130	N/A
Madison (U)	4,888	0.96%	184	N/A	98	N/A
Minidoka (R)	5,808	1.14%	372	N/A	573	N/A

Urban and Rural Counties	Population of Individuals 55+	Ratio of Eligible State Population (est. 508,046)	Greatest Economic Need	Minorities	Limited English Proficient	Greatest Social Need
Nez Perce (U)	13,464	2.65%	917	2,735	74	N/A
Oneida (R)	1,475	0.29%	73	N/A	36	N/A
Owyhee (R)	3,571	0.70%	194	N/A	326	N/A
Payette (R)	7,080	1.39%	576	N/A	148	N/A
Power (R)	2,225	0.44%	50	N/A	230	N/A
Shoshone (R)	4,958	0.96%	302	N/A	77	N/A
Teton (R)	2,789	0.55%	59	N/A	121	N/A
Twin Falls (U)	22,501	4.43%	1,533	7,808	796	425
Valley (R)	4,901	0.96%	300	N/A	20	N/A
Washington (R)	3,950	0.78%	209	N/A	166	N/A

County Population: 55 years and older, Greatest Economic Need: 55 years old or over and below 125% of poverty, Ratio of Individuals: those individuals 55 years or older and below 125% of poverty compared to the total population of Idahoans 55+, Minorities: ACS 1-Year Estimate: 65 or older, One, Two, or More Races (not including "White"), Limited English Proficient: ACS 1- Year Estimate "Limited English Speaking Households", Greatest Social Need: 65 years or older with a disability and below 125% of poverty (Census data compiled only for Ada, Bannock, Bonneville, Canyon, Kootenai, and Twin Falls counties).

Sources: U.S. Bureau of Census, American Community Survey 5-Year Estimates, Population 60 Years And Over In The United States (2020).

U.S. Bureau of Census, American Community Survey 1-Year Estimates, Sex by Age by Disability Status (2019).

U.S. Bureau of Census, American Community Survey 1-Year Estimates, Limited English Speaking Households (2019).

U.S. Bureau of Census, American Community Survey 1-Year Estimates, Age by Disability Status by Poverty Status (2019).

6. THE RELATIVE DISTRIBUTION OF ELIGIBLE INDIVIDUALS WHO:

A. RESIDE IN URBAN AND RURAL AREAS WITHIN THE STATE

SCSEP Table 9: Relative Distribution of Eligible Individuals

Urban and Rural Counties	Population of Individuals 55+	Ratio of Eligible State Population (est. 508,046)	Greatest Economic Need	Minorities	Limited English Proficient	Greatest Social Need

Urban and Rural Counties	Population of Individuals 55+	Ratio of Eligible State Population (est. 508,046)	Greatest Economic Need	Minorities	Limited English Proficient	Greatest Social Need
Ada (U)	118,760	23.38%	6,395	33,350	2,691	1,552
Adams (R)	2,061	0.41%	130	N/A	5	N/A
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Bear Lake (R)	2,030	0.40%	103	N/A	17	N/A
Benewah (U)	3,589	0.71%	221	N/A	20	N/A
Bingham (R)	11,736	2.31%	694	7,197	286	N/A
Blaine (R)	7,698	1.52%	341	N/A	457	N/A
Boise (R)	3,505	0.69%	192	N/A	5	N/A
Bonner (R)	18,027	3.55%	1,406	2,050	46	N/A
Bonneville (U)	27,177	5.35%	1,426	10,181	599	N/A
Boundary (R)	4,378	0.86%	300	N/A	0	N/A
Butte (R)	1,035	0.20%	51	N/A	1	N/A
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Canyon (U)	52,290	10.29%	3,259	39,392	2,036	1,263
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Clearwater (R)	3,790	0.75%	215	N/A	19	N/A
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Gooding (R)	4,452	0.88%	221	N/A	305	N/A
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Jefferson (R)	6,246	1.23%	209	N/A	174	N/A
Jerome (R)	5,685	1.12%	353	N/A	800	N/A
Kootenai (U)	50,603	9.96%	2,174	8,338	456	814

Urban and Rural Counties	Population of Individuals 55+	Ratio of Eligible State Population (est. 508,046)	Greatest Economic Need	Minorities	Limited English Proficient	Greatest Social Need
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Lemhi (R)	3,674	0.72%	268	N/A	18	N/A
Lewis (R)	1,613	0.32%	164	N/A	8	N/A
Lincoln (R)	1,340	0.26%	111	N/A	130	N/A
Madison (U)	4,888	0.96%	184	N/A	98	N/A
Minidoka (R)	5,808	1.14%	372	N/A	573	N/A
Nez Perce (U)	13,464	2.65%	917	2,735	74	N/A
Oneida (R)	1,475	0.29%	73	N/A	36	N/A
Owyhee (R)	3,571	0.70%	194	N/A	326	N/A
Payette (R)	7,080	1.39%	576	N/A	148	N/A
Power (R)	2,225	0.44%	50	N/A	230	N/A
Shoshone (R)	4,958	0.96%	302	N/A	77	N/A
Teton (R)	2,789	0.55%	59	N/A	121	N/A
Twin Falls (U)	22,501	4.43%	1,533	7,808	796	425
Valley (R)	4,901	0.96%	300	N/A	20	N/A
Washington (R)	3,950	0.78%	209	N/A	166	N/A

County Population: 55 years and older, Greatest Economic Need: 55 years old or over and below 125% of poverty, Ratio of Individuals: those individuals 55 years or older and below 125% of poverty compared to the total population of Idahoans 55+, Minorities: ACS 1-Year Estimate: 65 or older, One, Two, or More Races (not including "White"), Limited English Proficient: ACS 1- Year Estimate "Limited English Speaking Households", Greatest Social Need: 65 years or older with a disability and below 125% of poverty (Census data compiled only for Ada, Bannock, Bonneville, Canyon, Kootenai, and Twin Falls counties).

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B. HAVE THE GREATEST ECONOMIC NEED

SCSEP Table 9: Relative Distribution of Eligible Individuals

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Cassia (R)	5,891	1.16%	221	N/A	433	N/A
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Clearwater (R)	3,790	0.75%	215	N/A	19	N/A
Custer (R)	1,979	0.39%	103	N/A	9	N/A
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Jefferson (R)	6,246	1.23%	209	N/A	174	N/A

Urban and Rural Counties	Population of Individuals 55+	Ratio of Eligible State Population (est. 508,046)	Greatest Economic Need	Minorities	Limited English Proficient	Greatest Social Need
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Oneida (R)	1,475	0.29%	73	N/A	36	N/A
Owyhee (R)	3,571	0.70%	194	N/A	326	N/A
Payette (R)	7,080	1.39%	576	N/A	148	N/A
Power (R)	2,225	0.44%	50	N/A	230	N/A
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C. ARE MINORITIES

SCSEP Table 9: Relative Distribution of Eligible Individuals

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D. ARE LIMITED ENGLISH PROFICIENT

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E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))

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U.S. Bureau of Census, American Community Survey 1-Year Estimates, Limited English Speaking Households (2019).

U.S. Bureau of Census, American Community Survey 1-Year Estimates, Age by Disability Status by Poverty Status (2019).

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

On April 15th, 2021, the US Department of Labor Employment & Training Administration released Training and Employment Guidance Letter No. 17-20 that provided guidance to Senior Community Service Employment Program (SCSEP) grantees regarding updates to the priority of service provisions, durational limit waiver categories, and State Plan requirements due to the passage of the Supporting Older Americans Act of 2020, which reauthorized the Older Americans Act (OAA) and included new provisions regarding certain individuals who were formerly incarcerated or under supervision following release from prison or jail. Under TEGL No. 17-20, “formerly-incarcerated individuals” are those individuals who: 1) were incarcerated and released from prison or jail at any point within the last five years; or 2) were under supervision at any point within the last five years, following release from prison or jail. The five-year period specified in this definition refers to the five years preceding the date of first determination of program eligibility, as described in 20 CFR 641.505, for initial enrollment into the program.

The following is statewide data for Idaho (per the US Department of Justice, Office of Justice Programs, "Census of Jails, 2005 - 2019 - Statistical Tables" report. Findings in this report are based on the 2005, 2013, and 2019 Census of Jails (COJ) and are statewide (county specific data is unavailable):

Idaho	
Confined inmates in local jails - 2019	4,250
Average daily admissions in Idaho jails - 2019	113,450
Percent of Idaho jail facilities that provide prerelease/work release	88.0%
Percentage of Idaho prisoners aged 55+ (2015)	10.74%
Number of Idaho prisoners aged 55+ (2015)	781

References:

Zhen Zeng, Ph.D., and Todd D. Minton, BJS Statisticians. US Department of Justice, Office of Justice Programs, Bureau of Justice Statistics. "Census of Jails, 2005 - 2019 - Statistical Tables". October 2021.

Widra, Emily. Prison Policy Initiative. "Since you asked: How many people aged 55 or older are in prison, by state?". May 2020.

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))

Strategy: ICOA will collaborate with partners to reduce negative impacts of redistribution, new Census or over-enrollment.

Planned Action:

ICOA will negotiate participant's transfers with national grantee when USDOL's releases the authorized positions, will update target employment areas based on, Census and labor market reports, and reviews quarterly progress reports and works with one-stop partners and SCSEP contractor to address over-enrollment.

PERFORMANCE INDICATOR APPENDIX

ALL WIOA CORE PROGRAMS

All WIOA Core Programs

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Effectiveness in Serving Employers	Not Applicable[1]	Not Applicable[1]	Not Applicable[1]	Not Applicable[1]

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

ADDITIONAL INDICATORS OF PERFORMANCE

Additional Indicators of Performance
N/A