COLORADO PYS 2020-2023

CONTENTS

Colorado PYs 2020-2023 1

I. WIOA State Plan Type and Executive Summary 3

a. WIOA State Plan Type 3

Combined Plan Partner Program(s) 3

b. Plan Introduction or Executive Summary 3

II. Strategic Elements 3

a. Economic, Workforce, and Workforce Development Activities Analysis 3

b. State Strategic Vision and Goals 45

c. State Strategy 49

III. Operational Planning Elements 58

a. State Strategy Implementation 58

b. State Operating Systems and Policies 75

IV. Coordination with State Plan Programs 110

V. Common Assurances (For All Core Programs) 111

VI. Program-Specific Requirements for Core Programs 112

Program-specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B 112

Program-Specific Requirements for Wagner-Peyser Program (Employment Services) 137

Program-specific Requirements for Adult Education and Family Literacy Act Programs 157

Program-Specific Requirements for Vocational Rehabilitation (Combined or General) 165

VII. Program-Specific Requirements for Combined State Plan Partner Programs 235

Temporary Assistance for Needy Families (TANF) 235

Trade Adjustment Assistance (TAA) 254

Jobs for Veterans' State Grants 254

Senior Community Service Employment Program (SCSEP) 263

Performance Indicator Appendix 286

All WIOA Core Programs 286

Additional Indicators of Performance 287

Other Appendices 287

I. WIOA STATE PLAN TYPE AND EXECUTIVE SUMMARY

A. WIOA STATE PLAN TYPE

This is a combined plan

COMBINED PLAN PARTNER PROGRAM(S)

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

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.)

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

The state of Colorado is pleased to submit this combined state plan to guide the work of our talent development network for the next four years. The data contained in this document highlight the areas we must focus on to ensure a prosperous economy and prosperity for all Coloradans. The goals and strategies discussed emphasize the importance of collaboration between myriad programs in order to provide the best possible focus on and service to our customers. As you examine these ideas and engage with the document, consider how you as an individual; your company, agency, organization, or institution; or your local community can partner with us in this work. Together, Colorado can achieve these goals and transform our workforce. In isolation, we will fall short. Please reach out with your comments, help us to continually improve our strategies and our implementation, and join together to meet the needs of the 21st century economy.

II. STRATEGIC ELEMENTS

A. ECONOMIC, WORKFORCE, AND WORKFORCE DEVELOPMENT ACTIVITIES ANALYSIS

1. ECONOMIC AND WORKFORCE ANALYSIS

In 2014, the Colorado Workforce Development Council (CWDC) convened a data team consisting of data analysts from multiple state agencies. This team included staff from the Labor Market Information unit within the Colorado Department of Labor and Employment along with representatives from the Department of Higher Education, the Department of Education, the Office of Economic Development and International Trade, the Office of State Planning and Budgeting and the State Demography Office at the Department of Local Affairs. The data team spearheaded the development of the first Colorado Talent Pipeline Report and created a common definition for a “top job”in Colorado.

Existing Demand Industry Sectors and Occupations

The table below shows the preliminary distribution of current employment, not seasonally adjusted, by industry for Colorado for October, 2019. Trade, Transportation, and Utilities comprise the largest industry in Colorado, employing 469,800 individuals, accounting for 17.2% of total employment. The second largest industry in the state is Government, employing 445,000 individuals, accounting for 16.3% of total employment. Professional and Business Services combine to form the third largest industry sector in Colorado, employing 425,600 individuals, accounting for 15.6% of the state’s total employment.

INDUSTRY Total Nonfarm	EMPLOYMENT 2,725,300
Total Private	2,280,300
Goods Producing	348,200
Service-Providing	2,377,100
Private Service Providing	1,932,100
Mining and Logging	28,300
Construction	172,300
Manufacturing	147,600
Durable Goods	92,200
NonDurable Goods	55,500
Trade, Transportation, and Utilities	469,800
Wholesale Trade	108,000
Retail Trade	272,700
Transportation Warehousing and Utilities	89,000
Information	74,900
Financial Activities	170,500
Professional and Business Services	425,600
Educational and Health Services	340,600
Leisure and Hospitality	339,900
Other Services	110,800
Government	445,000

Source: Colorado Dept. of Labor and Employment, Labor Market Information

The top ten occupations by employment in the following table account for 73% of all jobs and total 2,620,640 jobs in Colorado. While the top four categories have not changed since 2015, there are shifts in the list overall. Office and Administrative Support Occupations employ 14% of the total state population. Sales and Related Occupations as well as Food Preparation and Serving Related Occupations account for 11% and 10% of the state's employment respectively

SOC CODE	DESCRIPTION	2018 JOBS	2018 Avg. HOURLY WAGE
00-0000	Total all occupations	2,620,640	$26.84
43-0000	Office and administrative support	361,390	$19.68
41-0000	Sales and related	291,900	$23.01
35-0000	Food preparation and serving-related	255,250	$13.12

SOC CODE	DESCRIPTION	2018 JOBS	2018 Avg. HOURLY WAGE
13-0000	Business and financial operations	190,330	$37.87
53-0000	Transportation and material moving	150,880	$20.34
29-0000	Healthcare practitioners and technical	146,200	$40.35
25-0000	Education, training, and library	143,090	$26.40
47-0000	Construction and extraction	140,690	$24.03
15-0000	Computer and mathematical	116,930	$46.58
11-0000	Management	116,770	$63.34
51-0000	Production	102,540	$19.71
49-0000	Installation, maintenance, and repair	101,450	$24.75
39-0000	Personal care and service	93,270	$15.01
37-0000	Building and grounds cleaning and maintenance	83,120	$15.01
31-0000	Healthcare support	65,740	$17.07
17-0000	Architecture and engineering	61,970	$43.79
33-0000	Protective service	59,080	$24.04
27-0000	Arts, design, entertainment, sports, and media	40,640	$26.55
21-0000	Community and social services	39,470	$23.98
19-0000	Life, physical, and social science	30,330	$36.62
23-0000	Legal	22,540	$54.54
45-0000	Farming, fishing, and forestry	7,050	$15.60

Source: Colorado Dept. of Labor and Employment, Labor Market Information

Emerging Demand Industry Sectors

The table below shows the top 10 industries with the highest annual percent change in Colorado for the 2018-2028 time period.

Industry	2018 Estimated Employment	2028 Projected Employment	Total Annual Percent Change	Total 2018-2028 Employment Change
Warehousing and Storage	11,208	17,868	4.77%	6,660
Support Activities for Mining	15,533	21,752	3.42%	6,219

Industry	2018 Estimated Employment	2028 Projected Employment	Total Annual Percent Change	Total 2018-2028 Employment Change
Ambulatory Health Care Services	135,647	185,438	3.18%	49,791
Couriers and Messengers	12,595	17,193	3.16%	4,598
Social Assistance	58,397	78,226	2.97%	19,829
Construction of Buildings	34,703	46,283	2.92%	11,580
Professional, Scientific, and Technical Services	224,707	294,392	2.74%	69,685
Management of Companies and Enterprises	40,869	53,235	2.68%	12,366
Specialty Trade Contractors	113,876	145,746	2.50%	31,870
Heavy and Civil Engineering Construction	24,430	31,031	2.42%	6,601

Source: Colorado Dept. of Labor and Employment, Labor Market Information

To assess the emerging demand industry sectors, a 10-year projection (2018-2028) was utilized. Of the highest expected growth sectors, the five sectors with the largest gains in total projected employment are:

- Professional, Scientific, and Technical Services (+69,685)
- Ambulatory Health Care Services (+49,791)
- Specialty Trade Contractors (+31,870)
- Social Assistance (+19,829)
- Management of Companies and Enterprises (+12,366)

Emerging Demand Occupations

Using a ten year labor market projections to assess emerging demand occupations lowers the variance of Top Jobs from year to year by creating a stronger measure of long-term economic growth and offers better insights into future opportunities.

More specifically, the Colorado Talent Pipeline Report identified a Top Jobs list for Colorado. The 2019 report uses labor-market projections from the CDLE Office of Labor Market Information to identify jobs that meet three criteria: projected high net annual openings (>40), above-average growth rate over 10 years (>20.5%), and a good wage. The jobs in this report are categorized into two earnings tiers, recognizing that there are many essential jobs that may not

typically pay a high wage but are in high demand and/or could lead to a higher-paying in-demand job.

- Tier 1 includes jobs that have median earnings at or above a living wage for a family with two adults (one working) and one child ($25.06/hr.). When controlling for inflation, this is an increase of 56 cents from 2018's living-wage benchmark.
- Tier 2 includes jobs that meet a living-wage benchmark for an individual (median earnings of $13.19/hr.). When controlling for inflation, this is an increase of 45 cents over the 2018 benchmark.

As the cost of living increases in Colorado, it is important to consider not just jobs, but jobs that pay a sustainable wage. In addition, this report recognizes the clear value in identifying occupations with momentum and demand that could lead to jobs that do not exist today, but will be in high demand in the future.

Tier 1 Top Jobs List, Organized by Occupation Cluster

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
11-2021	Marketing managers	$77.82	$161,875	22.8522	404	Bachelor's degree	5 years or more	None
11-3021	Computer and information systems managers	$73.93	$153,783	24.0273	722	Bachelor's degree	5 years or more	None
11-3031	Financial managers	$70.19	$145,997	30.7116	747	Bachelor's degree	5 years or more	None
11-3061	Purchasing managers	$64.82	$134,819	21.0263	86	Bachelor's degree	5 years or more	None
11-3121	Human resources managers	$62.44	$129,875	21.8021	173	Bachelor's degree	5 years or more	None
11-3131	Training and development managers	$54.58	$113,532	21.9577	45	Bachelor's degree	5 years or more	None
11-9021	Construction managers	$42.88	$89,189	27.6941	1248	Bachelor's degree	None	Moderate-term on-the-job training

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
11-9111	Medical and health services managers	$52.24	$108,653	32.4943	586	Bachelor's degree	Less than 5 years	None
11-9151	Social and community service managers	$37.85	$78,719	25.3977	221	Bachelor's degree	5 years or more	None
13-1051	Cost estimators	$31.86	$66,265	25.2256	697	Bachelor's degree	None	None
13-1111	Management analysts	$41.62	$86,560	27.6479	1410	Bachelor's degree	Less than 5 years	None
13-1131	Fundraisers	$26.52	$55,166	22.9008	427	Bachelor's degree	None	None
13-1141	Compensation, benefits, and job analysis specialists	$33.00	$68,650	20.8497	138	Bachelor's degree	Less than 5 years	None
13-1151	Training and development specialists	$32.35	$67,284	22.6258	770	Bachelor's degree	Less than 5 years	None
13-1161	Market research analysts and marketing specialists	$31.44	$65,401	34.5199	2507	Bachelor's degree	None	None
13-2011	Accountants and auditors	$35.07	$72,939	22.4184	4796	Bachelor's degree	None	None
13-2021	Appraisers and assessors of real estate	$33.13	$68,900	27.5539	246	Bachelor's degree	None	Long-term on-the-job training
13-2051	Financial analysts	$43.30	$90,062	21.5241	448	Bachelor's degree	None	None

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
13-2052	Personal financial advisors	$40.92	$85,116	23.8171	599	Bachelor's degree	None	Long-term on-the-job training
15-1122	Information security analysts	$47.16	$98,093	45.0062	308	Bachelor's degree	Less than 5 years	None
15-1132	Software developers, applications	$50.47	$104,982	43.2992	3361	Bachelor's degree	None	None
15-1133	Software developers, systems software	$56.42	$117,350	26.7721	1479	Bachelor's degree	None	None
15-1134	Web developers	$34.31	$71,362	25.8197	380	Associate's degree	None	None
15-1141	Database administrators	$44.36	$92,261	22.9425	254	Bachelor's degree	Less than 5 years	None
15-1151	Computer user support specialists	$27.26	$56,701	22.7429	1580	Some college, no degree	None	None
15-1199	Computer, all other	$48.00	$99,834	21.0087	1191	Bachelor's degree	None	None
15-2031	Operations research analysts	$40.59	$84,417	39.2405	120	Bachelor's degree	None	None
15-2041	Statisticians	$39.86	$82,902	42.8571	68	Master's degree	None	None
17-1021	Cartographers and photogrammetrists	$33.80	$70,312	28.1216	100	Bachelor's degree	None	None

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
17-1022	Surveyors	$30.00	$62,404	25.0163	158	Bachelor's degree	Less than 5 years	None
17-2011	Aerospace engineers	$55.54	$115,528	26.7871	243	Bachelor's degree	None	None
17-2041	Chemical engineers	$45.55	$94,738	22.576	65	Bachelor's degree	None	None
17-2051	Civil engineers	$41.73	$86,805	24.4263	1005	Bachelor's degree	None	None
17-2061	Computer hardware engineers	$55.77	$116,009	20.5154	355	Bachelor's degree	None	None
17-2071	Electrical engineers	$46.83	$97,399	26.2624	383	Bachelor's degree	None	None
17-2081	Environmental engineers	$44.36	$92,272	23.9631	188	Bachelor's degree	None	None
17-2111	Health and safety engineers, except mining safety engineers and inspectors	$47.80	$99,428	22.3913	43	Bachelor's degree	None	None
17-2112	Industrial engineers	$46.69	$97,123	26.5742	341	Bachelor's degree	None	None
17-2141	Mechanical engineers	$44.70	$92,975	24.6623	544	Bachelor's degree	None	None
17-2151	Mining and geological engineers, including mining safety engineers	$47.56	$98,922	24.0413	70	Bachelor's degree	None	None

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
17-2171	Petroleum engineers	$65.66	$136,582	27.0391	179	Bachelor's degree	None	None
17-3011	Architectural and civil drafters	$27.35	$56,886	22.4498	304	Associate's degree	None	None
17-3012	Electrical and electronics drafters	$26.89	$55,938	23.7189	80	Associate's degree	None	None
17-3013	Mechanical drafters	$29.19	$60,713	20.9081	107	Associate's degree	None	None
17-3022	Civil engineering technicians	$26.93	$56,011	23.8129	167	Associate's degree	None	None
17-3025	Environmental engineering technicians	$28.74	$59,788	23.4501	44	Associate's degree	None	None
19-1021	Biochemists and biophysicists	$33.28	$69,232	27.3885	58	Doctoral or professional degree	None	None
19-1042	Medical scientists, except epidemiologists	$28.53	$59,349	22.7348	139	Doctoral or professional degree	None	None
19-2021	Atmospheric and space scientists	$44.42	$92,397	34.3732	197	Bachelor's degree	None	None
19-2041	Environmental scientists and specialists, including health	$41.44	$86,190	23.9803	433	Bachelor's degree	None	None
19-2042	Geoscientists, except hydrologists and geographers	$43.96	$91,435	25.3448	295	Bachelor's degree	None	None

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
19-2043	Hydrologists	$43.42	$90,305	23.991	56	Bachelor's degree	None	None
19-3031	Clinical, counseling, and school psychologists	$40.58	$84,406	23.4458	371	Doctoral or professional degree	None	Internship/residency
19-3051	Urban and regional planners	$36.01	$74,898	21.8573	97	Master's degree	None	None
19-4092	Forensic science technicians	$30.23	$62,872	27.1955	56	Bachelor's degree	None	Moderate-term on-the-job training
21-1013	Marriage and family therapists	$31.30	$65,108	35.4467	108	Master's degree	None	Internship/residency
21-1019	Counselors, all other	$25.28	$52,573	24.7839	49	Master's degree	None	None
21-1091	Health educators	$26.46	$55,032	26.6085	148	Bachelor's degree	None	None
21-2011	Clergy	$26.24	$54,582	26.5924	94	Bachelor's degree	None	Moderate-term on-the-job training
23-1011	Lawyers	$61.09	$127,068	20.5504	1017	Doctoral or professional degree	None	None
23-2011	Paralegals and legal assistants	$27.26	$56,710	28.8428	910	Associate's degree	None	None
27-2012	Producers and directors	$28.28	$58,831	20.7939	258	Bachelor's degree	Less than 5 years	None
27-3042	Technical writers	$36.94	$76,827	25.2915	178	Bachelor's degree	Less than 5 years	Short-term on-the-job training

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
27-3091	Interpreters and translators	$28.62	$59,539	37.6617	299	Bachelor's degree	None	Short-term on-the-job training
29-1021	Dentists, general	$63.02	$131,084	25.3086	150	Doctoral or professional degree	None	None
29-1031	Dietitians and nutritionists	$28.67	$59,632	23.2177	93	Bachelor's degree	None	Internship/residency
29-1041	Optometrists	$63.07	$131,181	23.8616	62	Doctoral or professional degree	None	None
29-1071	Physician assistants	$49.55	$103,069	51.1261	365	Master's degree	None	None
29-1122	Occupational therapists	$41.70	$86,745	30.5455	261	Master's degree	None	None
29-1123	Physical therapists	$39.16	$81,461	39.1667	480	Doctoral or professional degree	None	None
29-1126	Respiratory therapists	$29.90	$62,199	40.507	186	Associate's degree	None	None
29-1127	Speech-language pathologists	$41.86	$87,076	23.9087	277	Master's degree	None	None
29-1131	Veterinarians	$43.57	$90,627	34.0474	200	Doctoral or professional degree	None	None
29-1141	Registered nurses	$35.03	$72,868	28.9758	4422	Bachelor's degree	None	None
29-1171	Nurse practitioners	$50.75	$105,555	48.6599	311	Master's degree	None	None

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
29-1199	Health diagnosing and treating practitioners, all other	$27.19	$56,564	32.6294	133	Master's degree	None	None
29-2011	Medical and Clinical Laboratory Technologists	$33.26	$69,186	24.6629	262	Bachelor's degree	None	None
29-2021	Dental hygienists	$41.75	$86,845	25.1145	457	Associate's degree	None	None
29-2031	Cardiovascular technologists and technicians	$33.17	$69,000	25.6757	49	Associate's degree	None	None
29-2032	Diagnostic medical sonographers	$40.70	$84,661	37.4473	93	Associate's degree	None	None
29-2034	Radiologic technologists and technicians	$30.83	$64,125	24.9095	295	Associate's degree	None	None
29-2055	Surgical technologists	$25.49	$53,023	27.9927	191	Postsecondary non-degree award	None	None
29-9011	Occupational health and safety specialists	$38.28	$79,629	21.8417	137	Bachelor's degree	None	None
31-2011	Occupational therapy assistants	$27.14	$56,445	27.7003	96	Associate's degree	None	None
31-2021	Physical therapist assistants	$27.06	$56,284	35.7945	217	Associate's degree	None	None
47-1011	First-line supervisors of construction	$33.32	$69,301	29.2899	2385	High school diploma or equivalent	5 years or more	None

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
	trades and extraction work							
47-2021	Brickmasons and blockmasons	$26.67	$55,484	27.1563	288	High school diploma or equivalent	None	Apprenticeship
47-2111	Electricians	$26.43	$54,980	26.5272	2934	High school diploma or equivalent	None	Apprenticeship
47-4011	Construction and building inspectors	$31.28	$65,071	21.6116	336	High school diploma or equivalent	5 years or more	Moderate-term on-the-job training
47-4021	Elevator installers and repairers	$36.90	$76,760	29.6984	70	High school diploma or equivalent	None	Apprenticeship
47-5011	Derrick operators, oil and gas	$25.53	$53,095	40.9574	68	No formal educational credential	None	Short-term on-the-job training
49-2098	Security and fire alarm systems installers	$26.59	$55,305	23.1275	217	High school diploma or equivalent	None	Moderate-term on-the-job training
49-3043	Rail car repairers	$28.00	$58,234	21.9388	50	High school diploma or equivalent	None	Long-term on-the-job training
49-9044	Millwrights	$25.13	$52,279	22.6601	49	High school diploma or equivalent	None	Apprenticeship
49-9051	Electrical power-line installers and repairers	$40.66	$84,570	20.5279	290	High school diploma or equivalent	None	Long-term on-the-job training
51-8021	Stationary engineers and boiler operators	$27.91	$58,050	22.1093	107	High school diploma or equivalent	None	Long-term on-the-job training
53-1021	First-Line Supervisors of Helpers,	$25.07	$52,147	24.836	295	High school diploma or equivalent	Less than 5 years	None

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
	Laborers, and Material Movers,							
53-7021	Crane and tower operators	$25.73	$53,517	21.6797	70	High school diploma or equivalent	Less than 5 years	Moderate-term on-the-job training

Tier 2 Top Jobs List, Organized by Occupation Cluster

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
13-1121	Meeting, convention, and event planners	$23.18	$48,210	20.6158	588	Bachelor's degree	None	None
19-4091	Environmental science and protection technicians, including health	$22.85	$47,519	27.7476	146	Associate's degree	None	None
21-1011	Substance Abuse and Behavioral Disorder Counselors	$20.03	$41,663	31.6527	267	Bachelor's degree	None	None
21-1012	Educational, guidance, school, and vocational counselors	$23.88	$49,667	21.3313	612	Master's degree	None	None
21-1014	Mental Health Counselors	$23.45	$48,787	30.6396	898	Master's degree	None	Internship/residency
21-1021	Child, family, and school	$22.67	$47,157	23.4742	962	Bachelor's degree	None	None

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
	social workers							
21-1022	Healthcare social workers	$24.28	$50,500	30.9055	369	Master's degree	None	None
21-1023	Mental health and substance abuse social workers	$21.85	$45,438	30.7107	286	Bachelor's degree	None	None
21-1093	Social and human service assistants	$16.87	$35,080	24.1859	422	High school diploma or equivalent	None	Short-term on-the-job training
21-1094	Community health workers	$18.67	$38,833	27.7849	128	High school diploma or equivalent	None	Short-term on-the-job training
21-1099	Community and social service specialists, all other	$17.54	$36,477	24.892	552	Master's degree	None	None
25-3021	Self-enrichment education teachers	$17.93	$37,293	25.4063	858	High school diploma or equivalent	Less than 5 years	None
29-1128	Exercise physiologists	$22.90	$47,622	25.9939	57	Bachelor's degree	None	None
29-2012	Medical and Clinical Laboratory Technicians	$20.37	$42,366	26.3716	205	Associate's degree	None	None
29-2041	Emergency medical technicians and paramedics	$18.41	$38,303	23.8851	417	Postsecondary non-degree award	None	None

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
29-2056	Veterinary technologists and technicians	$17.34	$36,065	35.8832	525	Associate's degree	None	None
29-2057	Ophthalmic medical technicians	$17.77	$36,962	25.4797	105	Postsecondary non-degree award	None	None
29-2071	Medical records and health information technicians	$22.59	$46,997	25.9966	272	Postsecondary non-degree award	None	None
29-2099	Health technologists and technicians, all other	$20.61	$42,877	29.3661	293	High school diploma or equivalent	None	None
31-1014	Nursing assistants	$15.38	$31,996	22.6368	2996	Postsecondary non-degree award	None	None
31-1015	Orderlies	$14.07	$29,257	23.5955	65	High school diploma or equivalent	None	Short-term on-the-job training
31-2022	Physical therapist aides	$14.63	$30,420	37.2428	85	High school diploma or equivalent	None	Short-term on-the-job training
31-9011	Massage therapists	$22.00	$45,752	39.9933	1438	Postsecondary non-degree award	None	None
31-9091	Dental assistants	$19.31	$40,166	25.1914	1076	Postsecondary non-degree award	None	None
31-9092	Medical assistants	$17.13	$35,640	37.5617	1746	Postsecondary non-degree award	None	None
31-9093	Medical equipment preparers	$18.82	$39,156	25.9363	176	High school diploma or equivalent	None	Moderate-term on-the-job training

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
31-9096	Veterinary assistants and laboratory animal caretakers	$14.29	$29,713	35.4839	126	High school diploma or equivalent	None	Short-term on-the-job training
31-9097	Phlebotomists	$16.89	$35,125	38.1194	281	Postsecondary non-degree award	None	None
35-2014	Cooks, restaurant	$13.68	$28,462	22.6184	5755	No formal educational credential	Less than 5 years	Moderate-term on-the-job training
39-2011	Animal trainers	$13.20	$27,459	24.2245	100	High school diploma or equivalent	None	Moderate-term on-the-job training
43-3021	Billing and posting clerks and machine operators	$18.98	$39,487	25.6654	945	High school diploma or equivalent	None	Moderate-term on-the-job training
43-4181	Reservation and transportation ticket agents and travel clerks	$18.33	$38,127	21.222	331	High school diploma or equivalent	None	Short-term on-the-job training
43-5011	Cargo and freight agents	$20.05	$41,699	23.796	81	High school diploma or equivalent	None	Short-term on-the-job training
43-5021	Couriers and messengers	$14.77	$30,721	38.6515	218	High school diploma or equivalent	None	Short-term on-the-job training
47-2022	Stonemasons	$19.01	$39,543	25	46	High school diploma or equivalent	None	Apprenticeship
47-2031	Carpenters	$22.86	$47,554	25.3971	2882	High school diploma or equivalent	None	Apprenticeship

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
47-2041	Carpet installers	$22.04	$45,845	27.8195	49	No formal educational credential	None	Short-term on-the-job training
47-2043	Floor sanders and finishers	$16.18	$33,663	28.1609	43	No formal educational credential	None	Moderate-term on-the-job training
47-2044	Tile and marble setters	$19.21	$39,954	24.9313	173	No formal educational credential	None	Long-term on-the-job training
47-2051	Cement masons and concrete finishers	$21.61	$44,956	28.2694	910	No formal educational credential	None	Moderate-term on-the-job training
47-2061	Construction laborers	$17.05	$35,466	25.093	4207	No formal educational credential	None	Short-term on-the-job training
47-2071	Paving, surfacing, and tamping equipment operators	$21.78	$45,304	21.4112	329	High school diploma or equivalent	None	Moderate-term on-the-job training
47-2073	Operating engineers and other construction equipment operators	$23.78	$49,456	25.7648	1582	High school diploma or equivalent	None	Moderate-term on-the-job training
47-2121	Glaziers	$22.68	$47,179	26.648	221	High school diploma or equivalent	None	Apprenticeship
47-2132	Insulation workers, mechanical	$20.46	$42,551	26.5606	118	High school diploma or equivalent	None	Apprenticeship
47-2151	Pipelayers	$20.07	$41,749	29.721	139	No formal educational credential	None	Short-term on-the-job training

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
47-2152	Plumbers, pipefitters, and steamfitters	$24.95	$51,894	33.3302	1656	High school diploma or equivalent	None	Apprenticeship
47-2171	Reinforcing iron and rebar workers	$22.08	$45,928	30.1587	55	High school diploma or equivalent	None	Apprenticeship
47-2181	Roofers	$19.55	$40,663	28.9604	620	No formal educational credential	None	Moderate-term on-the-job training
47-2211	Sheet metal workers	$21.21	$44,110	27.6755	544	High school diploma or equivalent	None	Apprenticeship
47-2221	Structural iron and steel workers	$24.18	$50,300	28.73	213	High school diploma or equivalent	None	Apprenticeship
47-3011	Helpers--brickmasons, blockmasons, stonemasons, and tile and marble setters	$17.92	$37,271	29.4011	104	No formal educational credential	None	Short-term on-the-job training
47-3012	Helpers--carpenters	$16.71	$34,765	29.8413	59	No formal educational credential	None	Short-term on-the-job training
47-3013	Helpers--electricians	$17.68	$36,782	27.4272	76	High school diploma or equivalent	None	Short-term on-the-job training
47-3015	Helpers--pipelayers, plumbers, pipefitters, and steamfitters	$16.33	$33,971	36.9628	71	High school diploma or equivalent	None	Short-term on-the-job training

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
47-4031	Fence erectors	$16.21	$33,719	28.3308	100	No formal educational credential	None	Moderate-term on-the-job training
47-4041	Hazardous materials removal workers	$19.68	$40,927	23.0402	227	High school diploma or equivalent	None	Moderate-term on-the-job training
47-4071	Septic tank servicers and sewer pipe cleaners	$21.49	$44,689	20.6107	82	No formal educational credential	None	Moderate-term on-the-job training
47-4099	Construction and Related Workers, All Other	$17.12	$35,622	28.5217	169	High school diploma or equivalent	None	Moderate-term on-the-job training
47-5012	Rotary drill operators, oil and gas	$24.13	$50,183	40.7155	214	No formal educational credential	None	Moderate-term on-the-job training
47-5013	Service unit operators, oil, gas, and mining	$22.90	$47,639	35.1922	410	No formal educational credential	None	Moderate-term on-the-job training
47-5021	Earth drillers, except oil and gas	$23.91	$49,733	29.3805	84	High school diploma or equivalent	None	Moderate-term on-the-job training
47-5071	Roustabouts, oil and gas	$20.57	$42,788	37.3613	603	No formal educational credential	None	Moderate-term on-the-job training
47-5081	Helpers--extraction workers	$17.29	$35,973	33.82	72	High school diploma or equivalent	None	Moderate-term on-the-job training
49-2092	Electric motor, power tool, and related repairers	$22.05	$45,856	20.7612	71	Postsecondary non-degree award	None	Long-term on-the-job training

SOC	Occupation Title	Median Hourly	Median Annual	2018-2028 Growth Rate (%)	Annual Avg. Openings	Typical Entry Education Level	Work Experience	Add'l Training
49-2097	Electronic home entertainment equipment installers and repairers	$20.44	$42,515	21.4719	178	Postsecondary non-degree award	None	Short-term on-the-job training
49-3091	Bicycle repairers	$14.44	$30,038	27.2578	102	High school diploma or equivalent	None	Moderate-term on-the-job training
49-9011	Mechanical door repairers	$20.57	$42,789	20.9713	94	High school diploma or equivalent	None	Moderate-term on-the-job training
49-9021	Heating, air conditioning, and refrigeration mechanics and installers	$24.94	$51,880	32.7294	844	Postsecondary non-degree award	None	Long-term on-the-job training
53-1011	Aircraft cargo handling supervisors	$23.87	$49,654	24.5098	43	High school diploma or equivalent	Less than 5 years	None
53-3033	Light truck or delivery services drivers	$16.98	$35,319	22.3986	2827	High school diploma or equivalent	None	Short-term on-the-job training
53-6099	Transportation workers, all other	$23.16	$48,165	23.3079	331	High school diploma or equivalent	None	Short-term on-the-job training
53-7051	Industrial truck and tractor operators	$16.91	$35,178	21.7904	1314	No formal educational credential	None	Short-term on-the-job training
53-7062	Laborers and freight, stock, and material movers, hand	$14.54	$30,244	21.1408	6037	No formal educational credential	None	Short-term on-the-job training

Tier 1

Occupations that are part of the Tier 1 list (high growth rates, high annual openings, and pay a living wage for a family of three) overwhelmingly require education or training beyond high school for entry into the field. When measured by job openings, 93 percent typically demand some level of postsecondary education or training, ranging from one-year-or-longer programs that combine OJT and coursework and graduate-level degrees. Nine percent of job openings are for middle-skill jobs - a job that typically requires additional education or training beyond a high school diploma, but less than a bachelor's degree - in fields like IT, healthcare, and the skilled trades. At the same time, a paradigm shift is underway, with employers increasingly recognizing the need to look for required competencies rather than simply defaulting to certain degree requirements. As WBL opportunities expand, more Top Jobs may be filled by individuals with these types of OJT experiences.

Tier 1 Top Jobs - Projected Annual Openings by Typical Education Needed for Entry

Education	Number of Openings	Percentage
Bachelor's degree	33585	67.11%
High school diploma or equivalent	7091	14.17%
Associate's degree	3385	6.76%
Doctoral or professional degree	2477	4.95%
Master's degree	1669	3.33%
Some college, no degree	1580	3.16%
Postsecondary non-degree award	191	0.38%
No formal educational credential	68	0.14%

Tier 2

For occupations that are on the Tier 2 list (high growth rates, high annual openings, and pay a living wage for an individual), less than half (45 percent) typically require formal postsecondary education/training for entry into employment. For jobs that call for education and/or training beyond high school, most are considered middle-skill jobs. Middle-skill jobs on this list are concentrated in the skilled trades and health care support positions. Here, occupations that expect a bachelor's or graduate degree tend to be in education, counseling, or social services.

Tier 2 Top Jobs - Projected Annual Openings by Typical Education Needed for Entry

TIER 2	Number of Opening per Education	Percentage
No formal educational credential	20819	40.60%
High school diploma or equivalent	15570	30.36%
Postsecondary non-degree award	9424	18.38%
Master's degree	2431	4.74%
Bachelor's degree	2160	4.21%
Associate's degree	876	1.71%

Employers' Employment Needs

For the occupations identified in Colorado's "Top Jobs" list, 64% require a credential beyond high school with 86% of Tier 1 jobs requiring an associate's degree or higher. However, our labor force is not adequately prepared or trained for these top jobs, with just 57 % of Coloradans holding a credential beyond high school. This suggests that Colorado has a need for multiple strategies to ensure people have opportunities for education and training, especially in nontraditional pathways.

Although top jobs and other occupations can be cross-industry, there are required skills that are common across occupations. The 2019 Colorado Talent Pipeline Report identified the top 10 essential skills that are found in job postings in Colorado. In contrast to technical (i.e., hard) skills that are specific measurable abilities, essential skills are more general personal qualities that help facilitate interactions with others. Often these skills are associated with workplace readiness. These nuanced qualities are transportable across industries (i.e., management, customer service), thus making them valuable for all individuals. The top ten essential skills include:

- Management
- Customer Service
- Sales
- Communication
- Operations
- Leadership
- Innovation
- Valid Driver's License
- Problem Solving
- Presentations

The top ten technical (i.e., hard) skills across all occupations include:

- Restaurant Operation
- Merchandising
- Accounting
- Nursing
- Selling Techniques
- Auditing
- Customer Experience
- Basic Life Support
- Customer Relationship Management
- Agile Software Development

In addition to identifying skills required to perform in an occupation, it is important to provide upskilling opportunities for employees because new technology is causing a shift in how work is being done, creating opportunities for workers to be more productive and efficient. However, this means that workers' knowledge, skills, and abilities need to ensure they are digitally literate, agile, and can keep up with the continuously shifting nature of work.

Workforce Analysis

To gain a better understanding of the workforce trends in the State of Colorado, state level data was compiled to have a holistic view of the workforce. The Talent Pipeline Report was published to guide Colorado towards its workforce goals. This document, in addition to labor market data from the Colorado Department of Labor and Employment (CDLE), was used to create the workforce analysis.

Employment and Unemployment

Unemployment levels in Colorado, however, vary substantially based on individuals' educational attainment. In 2018, unemployment in Colorado hovered at 2.6 percent for people with some college or an associate's degree and at 2.4 percent for an adult with a bachelor's degree or higher—lower than the unemployment rate for high school graduates (3.8 percent) and for those with less than a high school education (3.2 percent). Average earnings continue to be higher for those with higher levels of education

Educational Attainment	Unemployment Rate	Median Earnings
Less than a high school diploma	3.2%	$29,312
High School graduates, no college	3.8%	$35,013
Some college or associate degree	2.6%	$39,129
Bachelor's degree	2.4%	$54,937
Graduate or professional degree	2.4%	$68,181

Source: Current Population Survey, 2018; 2018 American Community Survey, 1-year Estimates

There are fluctuations in the unemployment rate by region of the state as well. A review of the unemployment rate for MSAs shows unemployment in October 2018 ranging from 2.8 percent (Boulder-Longmont MSA and Fort Collins-Loveland MSA) to 4.9 percent in the Pueblo MSA.

Colorado Unemployment by MSA

Area Name	Unemployment Rate
Pueblo MSA	4.9%
Grand Junction MSA	4.1%
Colorado Springs MSA	3.9%
Denver - Aurora MSA	3.2%
Greeley MSA	3.0%

Area Name	Unemployment Rate
Boulder-Longmont MSA	2.8%
Fort Collins-Loveland MSA	2.8%

Source: Colorado Dept. of Labor and Employment, Labor Market Information

The 2019 Colorado Talent Pipeline Report explored the unemployment dynamics for special populations within the state's workforce. The rate of individuals identified with specific barriers is shown in the table below.

Group	Unemployment Rate
Black or African American Youth (16-19)	25.9%
Youth (16-19)	14.5%
Veterans (18+)	5.8%
Black or African American, Male	7.1%
Black or African American, Female	5.9%

Youth Unemployment: The youth unemployment rate (ages 16 to 19) remained quite elevated throughout and following the Great Recession; more recently it has seen improvement. In 2018, the youth unemployment rate stood at 14.5 percent. However, the rate is still very high for black or African American youth, in particular, at 25.9 percent (Current Population Survey).

Veterans: Unemployment rates for veterans are slightly elevated as compared to non-veterans. Employment services for recently separated veterans play a critical role in the successful transition from military to civilian employment. The Colorado Department of Labor and Employment provides specialized services that are available only for eligible veterans, such as individualized job search assistance and case management for veterans with a service-connected disability or other barriers to employment, vocational and work-based training, as well as job fairs and hiring events specifically for veterans. Veteran-specific services are provided by Veteran Employment Representatives (VER)—highly trained staff who are themselves veterans, and understand many of the challenges that veterans face.

One considerable veteran-specific issue is that many transitioning veterans have training and expertise in critical skill areas, but lack the civilian credentials necessary to obtain employment in their career field. The Colorado Department of Labor and Employment, Department of Regulatory Agency and Department of Higher Education are working together to identify military occupations that need civilian credentialing and licensing, compare military training with civilian requirements, and develop pathways to expedite the training and credentialing process.

Individuals with Disabilities: Frequently the first, and most intractable barrier underemployed or unemployed Coloradans with disabilities face is an overemphasis on what is expected that he or she cannot, should not, or is not doing. The lack of balance between a focus on functional limitation rather than on the person's talent and ambitions is expensive and wasteful. The workforce development system in Colorado is committed to providing the high quality services necessary to prepare individuals with disabilities to compete for jobs and fully participate in Colorado's workforce. Colorado currently ranks 9th in the nation for employment of individuals with disabilities. There are just over 300,000 Coloradans with disabilities, representing 8.9% of the State's population. 41.6% of these individuals are employed compared

to 79.1% of Coloradans who do not have a disability. When compared nationally, Coloradans with disabilities fare slightly better than the national average. However, there is still significant work to be done to improve the employment prospects of individuals with disabilities in Colorado, including encouraging participation in the workforce by individuals with disabilities through increased understanding of the supports available to promote their success, and ensuring those who seek to work have opportunities to do so in competitive integrated employment.

The Division of Vocational Rehabilitation (DVR) leads the way by providing the full range of rehabilitation services, including one-on-one vocational guidance and counseling, necessary to understand and mitigate the ways a disability may impede the capacity to show and apply talent at work. In Program Year 2018, DVR assisted 2009 Coloradans with disabilities to achieve their employment outcomes of obtaining, retaining, regaining, or advancing in competitive integrated employment. These workers earned an average of $14.69 an hour, working 28.3 hours a week on average. DVR further works with employers and community partners to increase opportunities for employment, career advancement, and economic gain for eligible Coloradans with disabilities. In addition to the work of DVR, all Workforce Centers are compliant with Section 188 of the Workforce Innovation and Opportunity Act, ensuring physical and programmatic access to all services and benefits available throughout the workforce development system. Ensuring Physical and programmatic accessibility is also a component of the state's certification policy for one-stop centers, which will help to further ensure that all customers can access services in all parts of the state.

When individuals with disabilities can access services effectively and efficiently, they not only benefit from being productive members of the workforce, but the state benefits from a population that relies less heavily on social services; it is crucial to sustain a supply of capable workers that will continue to grow Colorado business while attracting others to the state.

Long-term Unemployed: The long-term unemployed, (individuals out of work for 26+ weeks), face a unique combination of social, emotional, and skill deficiencies caused by the duration of their unemployment. These deficiencies require intensive "wraparound" services to address these issues effectively, while rapidly moving individuals to paid work experience and reemployment. Currently, there are 19,000 individuals considered long-term unemployed; during the same period the year before there were 21,000 individuals who were considered long-term unemployed.

The share of long-term unemployed out of all unemployed persons also continues to decrease: currently, the long-term unemployed make up less than one fifth of all unemployed (Bureau of Labor Statistics, 2018). Credit for this drop can be attributed to Colorado's improved economy, as well as to concentrated public and private initiatives.

Labor Market Trends

The 2018 Talent Pipeline Report notes that by the year 2020, it is estimated that 64 percent of all jobs, nationally, will require post-secondary education. In Colorado, however, 74 percent of all jobs statewide and 86% of tier 1 top jobs will require some level of post-secondary education or training by the year 2020, well exceeding the national average. Relative to the rest of the nation, Colorado has a highly educated adult population. However, Colorado's existing labor force has a credential attainment of 57%, illustrating a significant gap between actual and required postsecondary credential attainment in the state.

More jobs are expected to require higher levels of education in the coming years. To meet emerging employer demand, Colorado will need to increase postsecondary credential

production by 1.8% per year in order to meet the goal set by the Colorado Department of Higher Education of 66 percent post-secondary certificate or degree attainment level for Coloradans ages 25 to 34 by 2025.

Additionally, comprehensive state level data show that several industries and occupations are on the incline while others will continue to decline over the next 10 years.

As noted in the Talent Pipeline Report, health care and social assistance will add an additional 91,122 jobs to the economy over the next ten years. The subsectors that will experience the most growth are:

- Offices of Other Health Practitioners (12,626 jobs)
- Individual and Family Services (12,148 jobs)
- Home Health Care Services (10,709 jobs)
- Offices of Physicians (8,469 jobs)

Professional, scientific and technical services will add an additional 52,559 jobs over the next ten years. The Computer Systems Design Services subsector will add an additional 16,742 jobs over the next ten years while the subsectors of Management, Scientific, and Technical Consulting Services, Architectural, Engineering, and Related Services, and Accounting, Tax Preparation, Bookkeeping, and Payroll services will add 11,350; 9,344; and 4,823 jobs respectively.

Education and Skill Levels of the Workforce

It is important to note that there are significant disparities in educational attainment by race ethnicity. Identifying these gaps is important in addressing overall workforce preparedness due to its impact on the development of the state economy. In Colorado, 26.2 percent of Hispanic adults (25-34 years old) have a college degree, whereas 58.9 percent of non-Hispanic white adults 25-34 years old have a degree. Due to these statistics, Colorado foresees needing additional support for those in underserved populations due to the impact of educational attainment on the long term sustainability of the workforce.

One variable that complicates analysis of a state's workforce supply are interstate migration patterns. Typically, people with higher levels of education tend to have higher levels of geographic mobility, so while Colorado may lose a portion of educated Coloradans to out-of-state opportunities, the state still attracts a large share of highly educated people. While Colorado has consistently been able to attract qualified talent from outside of Colorado historically, in-state migration is projected to slow over the next 20 years, impacting Colorado's talent pipeline as older skilled workers continue to retire in large numbers.

Skill Gaps

During the development of the Colorado Talent Pipeline Report, the Colorado Department of Education, Department of Higher Education, and the Colorado Workforce Development Council collaborated to identify the skills that will ensure Coloradans are prepared for work or education beyond high school. Through facilitated discussions with business and industry, education, higher education, non-profit organizations, government stakeholders, and students, core skills were identified for more than 100 established, industry-developed competencies that are necessary for success beyond high school. These core skills are included below and will be a focus on the workforce and education programs driven by sector partnerships and career

pathways in the state. Across industry, as measured by O*NET scores, the most in-demand skills include:

- Critical thinking
- Active listening
- Reading comprehension
- Speaking
- Judgment and decision making
- Complex problem solving

Colorado's Graduation Guidelines are intended to assist students in gaining work-ready skills while in high school. At the secondary level, the goal is for all students to understand and articulate their individual skill-set, how they relate to potential careers and jobs, and graduate with these in-demand skills from high school. Colorado industry representatives are clear that students who graduate from high school and seek to work in Colorado need in-demand skills that meet business, industry, and higher education standards. Graduation guidelines are a roadmap to help students and their families plan for success after high school by demonstrating their knowledge, skills and abilities to enter the workforce, military or higher education without significant training or remediation. The expected K-12 Outcomes include Academic Competencies, Professional Competencies, Entrepreneurial Competencies, Personal Competencies, and Civic Competencies. As shown below, each of the most needed skills align with at least one of the expected K-12 Outcomes.

	Academic	Professional	Personal	Entrepreneurial	Civic
Active Listening	Yes	Yes	No	No	No
Complex Problem Solving	No	Yes	No	Yes	No
Critical Thinking	Yes	No	No	No	No
Judgment and Decisions	No	No	Yes	No	Yes
Reading Comprehension	Yes	No	No	No	No
Speaking	No	Yes	No	No	No

While the opportunity therefore exists for students to exit the K-12 system with necessary skills, employers communicate that they struggle finding individuals who have the necessary professional competencies to perform, even in low-skill jobs. Additionally, as stated above, 64 percent of the top jobs list are for occupations that typically require some level of formal postsecondary education or training for entry, whether it is an employer-sponsored formal training program, apprenticeship, certificate or degree. Colorado continually works with industries to identify the skills and competencies needed for critical occupations. This process is done with education at the table so that training providers can make informed decisions about program and curriculum shifts that may be needed to ensure in-demand skills are being taught to students.

2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

A. The State's Workforce Development Activities

Colorado's workforce development activities are coordinated through the following state agencies: the Colorado Department of Labor and Employment (CDLE), Colorado Department of Education (CDE), and Colorado Department of Human Services (CDHS). These agencies are responsible for all the core and non-core programs included in the combined state plan.

State Agency Program Responsibility

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

The Colorado Workforce Development Council (CWDC) is the governing body charged with the continuous improvement of the workforce system and oversight of Workforce Innovation and Opportunity Act (WIOA) funds and programs. CWDC ensures that the state workforce activities are aligned with the efforts of economic development, education, workforce development, government, and business stakeholders at the local, regional, and state levels. This multifaceted alignment of public and private stakeholders creates a workforce system that is demand-driven, flexible, and responsive to the needs of Coloradans.

Colorado's workforce system is driven from the bottom up through 10 local workforce areas including the Colorado Rural Workforce Consortium (CRWC), which is comprised of 10 sub-areas. Each workforce area and sub-area has a board strategically directing the workforce activities at the community level and providing local guidance for implementation of workforce programs. With local guidance, workforce activities are often customized to fit the needs of individual customers, both businesses and job seekers alike. The partnerships and atmosphere of collaboration guided by the state agencies and CWDC funnel to the local areas to create a fully integrated workforce system of not only core and non-core program partners, but community stakeholders that facilitate a system design to provide impactful services and activities throughout the state.

Colorado fully embraces the innovation aspect of the Workforce Innovation and Opportunity Act. In the PY16-PY19 Combined State Plan, a specific focus was placed piloting concepts and analyzing what works to serve customers. As we move forward into this four year plan, the desire to innovate remains and is balanced with a focus on moving towards evidence-based practices in workforce development. Local areas have engaged in evaluation activities and as Colorado learns from practices in other states, the effectiveness of programming can be continuously enhanced.

Colorado Workforce Centers

The Colorado Workforce Centers are at the forefront of the workforce activities, and represent Colorado's version of the American Jobs Center. There are 57 workforce centers spread across the state providing access to many Coloradans. In addition to these locations, Colorado has partnered with several local stakeholders to establish 31 virtual workforce centers where customers can access staff members through technology. Another example of collaboration and an effort to provide additional access to as many customers as possible is an initiative led by the Colorado Rural Workforce Consortium (CRWC). The CRWC is working with Library Partners in a few counties where Coloradans can access basic career services including over-the-shoulder assistance with Connecting Colorado, the state job matching system. As broadband becomes more consistent in the more rural counties where there is no workforce center, expansion of this and other tools will be evaluated and considered. In all, Colorado has more than 100 physical locations where the unemployed, underemployed, and businesses can receive an array of workforce system information and services.

The Colorado Workforce Centers are overseen at the state level by the CDLE, and are managed locally by each of the local area and sub-area boards. Local boards are comprised of local businesses, labor, partner agencies, and other key stakeholders to create a diverse and functional group. The boards, in alignment with the States' vision, provide front line strategic implementation for state-wide initiatives in addition to their locally-determined priorities. State initiatives include sector strategies, career pathway development, and standardized business services delivery. Local priorities include layoff aversion, specific career pathway development, youth programs, targeted sector partnerships, work-based learning, and others.

Local boards are tasked with procuring a one-stop operator for the daily operation of their perspective center(s) in accordance with WIOA 121(d). These boards carry out workforce activities by partnering locally though Memorandums of Understanding (MOU) to implement core, non-core, and other partner programs. Colorado Workforce Centers are fully integrated with WIOA, Wagner-Peyser, Jobs for Veterans State Grant (JVSG), and Trade Adjustment Assistance (TAA); local partnerships and integration also exist in many areas with TANF, Supplemental Nutrition Assistance Program (SNAP), Adult Education and Family Literacy, Vocational Rehabilitation, and others.

With this foundation for service integration, Colorado Workforce Centers operate under the "no wrong door" philosophy, while local areas have developed their own customer flow strategies that are unique to their area. Typical customers entering the center are engaged by an intake process that is designed to identify the needs of the individual by gathering information and then utilizing the appropriate resources for those needs. In some cases, the resources are initiated by a referral to a partner program. Customers are given solutions and next steps to their questions, barriers, and issues by connecting directly with the appropriate workforce system partner as part of this philosophy. Because Colorado Workforce Centers are fully integrated and operate in close partnership with other workforce agencies, co-enrollment in

multiple programs is commonplace. Co-enrollment provides the customer with the ideal service plan while allowing the system to utilize its resources in an efficient manner.

Collaboration of Activities

Communication is vital in order to coordinate and align workforce services statewide. This communication starts with the CWDC which has representation from the CDLE, CDHS, CDE, Colorado Department of Higher Education, and Colorado Department of Corrections, and which encompasses all of the core, non-core, and partner programs providing workforce activities in the state. Communication is further enhanced by the collaborative efforts of local area workforce directors, who hold a monthly director's meeting where partnerships, special initiatives, and ongoing efforts are discussed with one another and state partners.

The CDLE recognized that local areas needed assistance in collaboration and information sharing and created an online Knowledge Management Portal, e-Colorado, which manages virtual resources through a single, comprehensive, electronic interface developed for workforce stakeholders and partners, including businesses, workforce professionals, government, and others. This resource allows for all stakeholders within the workforce development system to readily access policies, best practices, and program information including eligibility criteria. The portal offers team rooms for front line staff to discuss services and coordinate workforce activities through online calendars. In addition to these features, the portal offers business tools that include Virtual Job Fairs and online fillable "smart" forms, and houses the Adobe Connect online meeting capability utilized by stakeholders, as well as Colorado's Workforce Centers, to conduct webinars and other online meetings.

Connecting Colorado is the case management, data collection, and reporting system utilized by all of the Workforce Centers. The system provides the ability for Workforce Centers and their partners to track all WIOA, TAA, Veteran, Wagner-Peyser, state and local programs (approximately 60), plus discretionary grants in one common database. All reports generated from this system are "up to the minute," thus allowing for better management of day-to-day activity and performance. Along with the federally-mandated reports, Colorado has developed a variety of locally-requested reports that allow staff to track their caseloads, correct data entry errors, and analyze performance at the state, local, and case manager level. In addition, the system is agile enough to allow the as-needed addition of reports, and program and service codes that will track new statewide initiatives supporting the state's workforce strategies. Workforce partners may make use of this system through data sharing agreements with the state or the local workforce regions.

Through this planning and collaboration, Colorado Workforce Centers were able to provide a full range of workforce services to nearly 200,000 job seekers in PY18. In that same period, more than 2,000 businesses received services from the standardized business service team while more than 4,300 job seekers were provided training services to increase the talent pipeline and meet the needs of the state's businesses in targeted sectors with high-growth industries.

Workforce System Services - Unemployed and Underemployed

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

Colorado Workforce Center Services

Basic Career Services	Determination of Eligibility Initial assessment Labor Exchange Information - Connecting Colorado Labor Market Information - Colorado LMI Gateway Unemployment Insurance Information FAFSA Assistance Referrals
Individualized Career Services	Development of Individual Employment Plan Group Counseling Individual Counseling Comprehensive and specialized assessments Career Planning Internships Short-Term Pre-Vocational Services (soft skills such as communication, punctuality, and personal maintenance skills) Workforce Preparation Activities (i.e., MS office, keyboarding, and Internet) Financial Literacy
Follow-Up Career Services	12 months of follow-up

Career services available at the centers vary because of local area inflexion and needs of particular communities. Basic career services are available at over 100 locations throughout Colorado. Each center has computers, printers and copiers, printed resources, and staff to assist jobseekers.

Many of the services, including Connecting Colorado and Colorado LMI Gateway, can be accessed virtually though the internet via computer, smart phone, or tablet. Connecting Colorado is the state job matching system and is the virtual one-stop-shop where Coloradans can centralize all their career search activities. It allows jobseekers to self-enter his/her resume(s) and job search 24/7. Jobseekers can set up virtual recruiters and receive an e-mail notification once a job is entered that matches their unique specifications. Connecting Colorado also provides access to a tool box of job search assistance links that has been customized for each workforce area. Links include direct access to the area's web page, career exploration, training resources, self-marketing tools, Unemployment Insurance information, and additional job banks. The built-in event calendar communicates upcoming hiring events, job fairs, and other workforce activities. Colorado LMI Gateway allows jobseekers to make informed data-driven career decisions. This labor market system provides a wide variety of regional labor market services, such as labor trends, statistics, economic, demographic, salary, and employer data. It allows jobseekers to set up a personal page for their career exploration data to be readily accessible.

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

Individualized Career Services

Individualized career services within the Colorado Workforce Centers vary across the state, but all the offices offer a full line of activities to prepare jobseekers for the modern workforce. They address many of the soft skill and technical skill training Colorado employers require such as:

- Complex Problem Solving
- Writing
- Critical Thinking

- Judgment and Decision Making
- Deductive Reasoning
- Information Ordering
- Coordination
- Interacting With Computers, and
- Analyzing Data or Information

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

- Workshops - Job Search, Application, Resume Writing, Interviewing, Financial Literacy, etc.;
- Short-Term Pre-vocational Services - Career Readiness that includes soft skill training;
- Workforce Preparation Activities - Microsoft Office Training, Basic Computer, Keyboarding, KeyTrain, etc.;
- Career Exploration Inventories - CareerScope, COPS, My Next Move, etc.; and
- Comprehensive Assessments - Prove It!, My Next Move, WorkKeys, Test of Adult Basic Education, College in Colorado Career Exploration, etc.

Training Services

Career services are not always enough to enable job seekers to obtain self-sufficient employment. In some instances, formal training is required. Colorado Workforce Centers offer multiple trainings services such as:

- Occupational skills training
- On-the job training (OJT)
- Apprenticeships
- Incumbent worker training
- Skill upgrading and retraining
- Entrepreneurial training, and
- Adult education and family literacy activities

Training services are funded through WIOA programs, Pell Grants, partner programs, and state and local grants. Local areas are responsible for establishing and implementing local polices for eligibility, Individual Training Account (ITA) limits, and the identification of in-demand sectors or occupations. Through multiple initiatives and projects, Colorado has focused training and career development activities on sector strategies/partnerships and career pathway development.

WORK Act - The Skilled Worker Outreach, Recruitment, and Key Training Act (WORK Act) is a state grant program administered by CDLE and an 13-member grant review committee that is made up of system partners and stakeholders. The grant enables recipients to reach a broader audience through recruitment and outreach activities, increase enrollment in and completion of their skilled worker training programs, and fill existing needs for skilled workers in the market. This allows Colorado to address the middle skills gap by strengthening training programs and increasing participation. As of June 30, 2019- 57,690 participants recruited, 12,451 new program enrollees, 7,357 program completers, and 4,673 program completers employed, in industries including Infrastructure Engineering, Health and Wellness, Financial Services and Tourism and Recreation.

Colorado House Bill 15-1274 - The legislation directs the CWDC to coordinate multiple state agencies and industries in the design of career pathways in growing and emerging sectors. Industry Career Pathways are developed through a collaboration with the TalentFOUND network which includes, industry partners, training & education partners, and workforce partners. Each year the CWDC publishes a report on the career pathway process and findings which appear in the annual Talent Pipeline report. Industry career pathways maps and career information including education and training opportunities are made publically available on a free website, CareersinColorado.org. In 2019 CareersinColorado.org became part of the new MyColoradoJourney.com platform. Significant promotion and training efforts take place each year to educate stakeholders on the web site and how to encourage their customers to use it as a career exploration and planning tool.

Colorado House Bill 15-1275 - This recent legislation has directed advisory boards made up of CDE, CDLE, community college systems, CWDC, and other stakeholders to create recommendations that assist local education providers in creating cooperative agreements to include apprenticeships and internship programs in the available concurrent enrollment programs. In addition, the legislation creates a tuition assistance program for eligible students enrolled in short-term certification programs that Pell Grants do not cover. This allows low-income individuals to enter career pathways through short-term certification programs, helping Colorado grow the middle class.

Displaced Homemaker Grant - The Displaced Homemaker Grant provides Keep Envisioning Your Success (KEYS) Scholarship, and is a partnership between CDLE and the Community College of Denver (CCD) to provide reemployment services to individuals who lost their primary source of income and must re-enter the labor market. The program provides financial support to participants to earn their Certificate or Associate Degree with programs focused on in-demand careers in the areas of health care, computer science, human services, business, legal, and education. In addition, the program helps participants develop self-confidence, achieve academic success, and overcome barriers to employment.

The continued development of sector partnerships and career pathways allows Coloradans to understand the full potential of their participation in workforce activities. Non-traditional training such as work and learn programs including OJTs and apprenticeships offer a wide selection of training opportunities, at the same time enabling local areas to customize training to fit the needs of regional industry demands. This flexibility in training options provides the state with the opportunity to assist individuals in obtaining the technical skills demanded by employers as outlined above. At the state level, the Eligible Training Provider List (ETPL) has been updated pursuant to WIOA Sections 122 and 134. This list ensures that Coloradans are able to make informed decisions on training providers and programs based on accurate data including completion and placement rates, labor market information, and wage expectations.

Supportive Services

In order to assist job seekers in obtaining or retaining employment though career or training services, Colorado Workforce Centers offer a variety of supportive services. Local areas are responsible for establishing supportive service policy that outlines types, eligibility, limits, etc. Examples of supportive services include child care, transportation, needs-related payments, tools and equipment, uniforms, and other clothing. In addition to WIOA-funded supportive services, local areas have developed relationships with community partners that assist with utility payments, food, shelter, and other basic needs. Formal MOUs with workforce partners outlined below provide additional supportive services such as cash and food assistance to jobseekers.

Workforce System Activities: Business

The focal point of all workforce system activities is business and industry. Colorado has been a national leader in the development of sector partnerships and business services over the past several years. The workforce system created a statewide Business Service Team consisting of members across core partners. The team established eleven core services to present to employers. These activities are taking place statewide and include:

Access to facilities - use of Workforce Center facilities by a business for a variety of purposes such as meetings, trainings, orientations, interviews, etc.;

Assessments - Any test or assortment of tests used to measure the skills, interests and/or personality traits of a job seeker, potential employee, or current employee;

Business education - Seminars, round tables, workshops, focus groups, etc.;

Business information - Information given to a business pertaining to a variety of incentive programs or other information requested that provides a benefit to that business;

Hiring events - A customized event for a single employer that assists with recruiting, interviewing, and hiring of one or more positions;

Job fairs - Brick & Mortar is an event for multiple employers that assists with the recruiting, interviewing, and hiring of one or more positions; Virtual is an online "event" in which employers and job seekers each meet in a virtual environment, using chat rooms, teleconferencing, webcasts, training/workshop videos, webinars, employers online hiring sites, and/or email to exchange information about job openings and/or resources;

Job postings - Staff-entered or web-entered job orders approved by staff;

Labor market information - Information on state and local labor market conditions; industries, occupations, and characteristics of the workforce; area business identified skills needs; employer wage and benefit trends; short and long-term industry and occupational projections; worker supply and demand; and job vacancies survey results;

Rapid Response - A comprehensive approach to identifying, planning for, responding to and averting mass layoffs and dislocations to minimize the impact on workers, businesses and communities. A wide range of customized services are delivered to businesses and affected workers including informational and direct re-employment services, support for filing unemployment insurance claims, connection with partners to address the needs of businesses and workers.

Screening - Any service that involves the initial evaluation of applications or resumes that assists the employer in the recruiting process; and

Training and retraining - Any service provided to a business that involves the training or retraining of current or future employees including OJTs, Work Experiences, Incumbent Worker Training, etc.

This collaboration among local areas is reinforced at the annual Business Service Summit where Business Services Representatives (BSR) from across the state work to ensure activities and strategies align system wide.

Workforce System Partners and Activities

Job Corps

Colorado has one Job Corps location in Collbran, Colorado. Job Corps is a federally-funded program under WIOA that provides free education and training to young adults (16-24 year olds). Eligible youth are able to earn a high school diploma or high school equivalency diploma and receive life, soft, and occupation skills training. The Job Corps partnership with Colorado's workforce system is statewide and comprehensive. Staff of the Collbran Job Corps Center and their outreach and recruitment contractor, CHP International, have a long history of participation in the state and local youth councils. Youth from the Collbran Job Corps Center also become members of local youth councils on a regular basis. Job Corps regularly participates in local youth job and career fairs. The strong relationship between the Colorado Workforce Centers and Job Corps is solidified by MOUs to provide Job Corps and their contracted vendor with access to Connecting Colorado. Collbran youth register with Connecting Colorado to search for jobs once they have completed their coursework and are transitioning back to the community. They benefit by posting a résumé, applying for a specific job, or completing a self-directed job search. A formalized process for referring Job Corps participants to local WIOA youth programs is in place with each workforce area and provides youth with access to more career services that they may need to meet their educational and employment goals.

YouthBuild

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

Migrant and Seasonal Farm Workers Program

CDLE administers the Migrant and Seasonal Farm Workers Program (MSFW), ensures that program information is available at all workforce centers, and that eligible participants receive proper referrals. Colorado is designated as a significant MSFW state and six centers have been determined as significant MSFW Workforce Centers (Brighton, Greeley, Lamar, Monte Vista, Delta, and Rocky Ford). These centers administer a bilingual (English/Spanish) outreach program through workforce centers to ensure that equitable services are provided to all MSFW clientele, including:

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

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

Employment First

In Colorado, the Supplemental Nutritional Assistance Program, Employment & Training program (SNAP E&T), as required by 7 CFR 273.7(e), and the Section 20 Optional Workfare program allowed under the provisions of 7 CFR 273.7(M), operate together as the Employment First program. The program assists Colorado SNAP recipients to connect to training and meaningful employment.

Employment First is administered through local county human services offices or through county procured vendors in 53 counties. Many county offices coordinate activities with local workforce centers and there are several examples of integration where the Employment First Program is operated by the local workforce office. Such local-level collaboration provides customers an opportunity to apply for and receive Employment First assistance as well as providing seamless access to additional WIOA Title I resources.

Participants may engage in a variety of employment-oriented activities including:

- Job Retention Services
- GED Preparation and Testing
- Adult Basic Education
- Post-secondary Education
- Literacy Instruction
- English Language Learner
- Vocational Training
- Employability Services
- Self-Employment Training
- On-the-job Training

- Pre-apprenticeships and/or Apprenticeships
- E&T Workfare and 30-day Workfare Job Search
- Work Experience

Colorado Works

Colorado's Temporary Assistance for Needy Families (TANF) is known as Colorado Works and is administered at the state level by the Colorado Department of Human Services, and is locally administered by county departments of human/social services. In some local areas, agreements are in place to establish partnerships between human service agencies and the workforce centers. In other areas, the workforce center may fall underneath the broader umbrella of the county human service department. While human service offices exist in all of Colorado's 64 counties, workforce centers are not always accessible within every county. In these areas, partnerships take the form of regional collaboration or virtual services.

All applicants for Colorado Works are given an assessment within 30 days of application that focuses on identifying what services and assistance will best support the family in achieving economic stability. Often times these assessments lead to referral(s) to WIOA and other workforce partner services as a priority population. In many counties, workforce development activities associated with Colorado Works are administered through the workforce center via a local level agreement or contract for services. Participants may engage in a variety of employment-oriented activities through the Colorado Works program, including:

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

Adult Education and Family Literacy

CDE's Office of Adult Education Initiatives (AEI) administers the federally-funded Adult Education and Family Literacy Act (AEFLA) grant program under Title II of WIOA, as well as the state-funded Adult Education and Literacy Act of 2014 grant program and the Workforce Diploma Pilot Program of 2019. AEI provides oversight for programs across the state, and services are provided locally by sub-grant recipients. As a combined plan core partner, and consistent with the focus of WIOA, adult education and family literacy services are essential to the workforce system. In many cases, meeting adult education and family literacy needs is the first step in a job seeker's career pathway. Adult education and family literacy services include adult basic education (below the ninth grade level, adult secondary education in preparation for high school equivalency credential attainment and English language acquisition focused on career pathways and family literacy to promote stronger educational advancement of children, helping break cycles of poverty, and building stronger local areas within Colorado. In addition, AEI will reserve no more than 20 percent of available AEFLA distribution funds and conduct a

competition for eligible providers to submit applications for section 225 (Programs for Corrections Education and Other Institutionalized Individuals) funds.

AEI will promote, support, and fund grantee Integrated English Literacy and Civics services. This program will address the needs of Colorado's large and growing immigrant population and other English language learners to place them in unsubsidized employment and into in-demand industries and occupations that lead to economic self-sufficiency. English language acquisition and civics education are provided concurrently and contextually.

Senior Community Service Employment Program

Senior Community Service Employment Program (SCSEP) is administered by the Division of Aging and Adult Services, Department of Human Services. SCSEP promotes useful, part-time employment opportunities in community service activities for persons with low incomes who are 55 years of age or older and have multiple barriers to employment. Priority is given to individuals who are: veterans, age 65 plus, live with a disability, have limited English proficiency and/or low literacy skills. The program is designed to foster individual economic self-sufficiency and increase the number of people in unsubsidized employment.

SCSEP participants are placed in non-profit or government agencies called, "Host Agencies." Host agencies agree to provide employment training through community service activities, upgrading the participants' employability skills. Participants are provided minimum wage, skill enhancement or acquisition of skills, personal and employment counseling, and assistance in obtaining unsubsidized employment. Approximately 1,000 individuals throughout Colorado are served annually through SCSEP.

Vocational Rehabilitation

Vocational Rehabilitation Programs fall under the authority of CDLE though the Division of Vocational Rehabilitation (DVR). DVR's positioning within CDLE, creates natural and meaningful partnerships with other WIOA services to better serve Coloradans with disabilities who have previously struggled to participate in the workplace, including those with disabilities for whom employment has remained completely out of reach, as well as other groups such as youth, recently discharged veterans, and the long-term unemployed. DVR believes in working together to promote a thriving employment environment with opportunity for every Coloradan with a disability to live independently and prosper. DVR accomplishes this mission with a variety of employment and training activities including:

Evaluation and diagnostic services provided to determine eligibility and the services needed for the individual to become employed;

Vocational rehabilitation counseling and guidance provided directly by a vocational rehabilitation counselor during the individual's plan of services;

Physical and mental restoration services which may be provided to correct or substantially modify an individual's physical or mental condition;

Training services, when necessary to become employed, including vocational training, academic training, personal and vocational adjustment training, job coaching, on-the-job training, job-seeking skills training, and books, tools, and other training materials;

Specialized services for individuals who are blind, deaf, and deaf-blind, including interpreter services, note-taking services, and reader services;

Rehabilitation technology services, including assistive technology devices, assistive technology services, and rehabilitation engineering services to address barriers encountered by an individual in attaining or retaining employment;

Placement services provided to assist an individual with a disability to find adequate and suitable employment in his/her chosen career; and

Supportive services, such as maintenance, transportation, personal assistance services, and services to family members may also be provided if necessary for the individual to utilize the services identified above.

Post-employment services may be provided to previously rehabilitated individuals when needed to maintain or regain suitable employment.

Pre-employment transition services provided to students with disabilities, including: job exploration and counseling, work-based learning experiences, counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education, workplace readiness training to develop social skills and independent living, and instruction in self-advocacy.

Technical assistance, training, outreach and other supportive services provided to public and private employers of all sizes, including Federal and Federal contracting employers for the purpose of increasing employment opportunities for job seekers with disabilities.

Trade Adjustment Assistance

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

Jobs for Veterans State Grant

Colorado will continue its strong tradition of promoting the training, hiring and retention of veterans, plus ensuring veterans priority of service in all USDOL funded programs. This will be accomplished through close working relationships with workforce system partners to make sure that veterans are represented to potential employers and business owners as qualified and professional employees who bring a unique set of skills to the workplace. The state workforce system delivers the full array of labor and employment services to Colorado veterans at all 77 of its State and County-run full-service Workforce Centers and satellite offices around the state. Disabled Veteran Outreach Program (DVOP) Specialists at the centers provide veterans with employment services such as job matching and referral to posted job openings, vocational and career guidance, labor market information, plus workshops on resume preparation and conducting effective job searches. Staff also refer eligible and qualified veterans to appropriate WIOA funded training programs and discretionary initiatives, as well as registered apprenticeship programs throughout the state.

In addition to State and County workforce center employees, who provide career services to all veterans, CDLE currently employs 27 full-time Disabled Veteran Outreach Program (DVOP)

Specialists and 9 full-time Local Veteran Employment Specialists (LVER) assigned to workforce areas around the state. These positions are funded through a USDOL Veterans Employment and Training Service (VETS) grant and fulfill all responsibilities mandated by the grant programs, including the provision of case management services to veterans with Significant Barriers to Employment (SBE's). The Jobs for Veterans State Grants Plan is included under Section VII. Veterans grant staff also serves other populations of veterans in the State through MOUs.

Those populations include:

- National Guard and Reserve members returning from Operation Iraqi Freedom (OIF) and Operation Enduring Freedom (OEF) - only if the individual meets eligibility criteria per most recent guidance (VPL 03-14, and 03-19). In particular, Virtual Job Fair Technology is being utilized to assist this group with veterans resource sites, accessed while they are still overseas, and actual virtual job fairs when they return to this country.
- Service-connected disabled veterans, who are targeted and identified through various Veterans Service Organizations (VSO) as well as outreach activities at Veteran Centers, Veterans Administration Medical Centers, and Community Based Outpatient Clinics (CBOCs.)
- Members of the Armed services who are wounded, ill and injured and receiving treatment in Military Treatment Facilities (MTF) or Warrior Transition Units (WTU) through relationships established with the Wounded Warrior Program located at Fort Carson.
- Incarcerated veterans, who are identified and contacted through "in-reach" activities conducted within correctional facilities managed by the Colorado Department of Corrections. DVOPs will also work in partnership with the Veteran Offender initiatives described in detail below under Ex-Offenders.
- Homeless Veterans - Veteran Employment Specialists work with the Homeless Veteran Reintegration Program (HVRP) to provide one-on-one employment assistance and supportive services to homeless veterans including, but not limited to, resume and interviewing preparation, employment workshops, job search assistance and job referrals. The supportive services provided include, but are not limited to, rent assistance, food, and transportation funding.

B. The Strengths and Weaknesses of Workforce Development Activities

Strengths

Colorado's workforce system has many strengths. Colorado has transformed its workforce system into a business and industry driven model. The services and activities to unemployed, underemployed, and businesses outlined above are designed with the intent to meet local and statewide industry demands. Through initiatives including sector partnerships, career pathway development, data analysis, system collaboration, and work and learn programming, the workforce system has fully embraced the key principles of WIOA. Colorado has aligned business services though the statewide business services team and maintained a customer-centric approach for both jobseekers and businesses.

The vital element to this success is the understanding that workforce development is truly a multi-faceted approach harnessing workforce, education, economic development, and business. Examples of statewide and local collaboration among partners exist throughout Colorado.

Alignment of resources and locally-specific co-location of services have allowed Colorado to have a flexible and proactive approach to workforce development by being able to create programs from the bottom up. Throughout Colorado there are numerous examples of "home grown" best practices that are shared through the e-Colorado online portal and highlighted each year in WIOA annual reports. Examples include:

- Board member and workforce partner staff engagement program where they participate in a half day immersion program at the workforce center to receive a firsthand understanding of the customer flow and services available;
- Onsite child care facilities and family friendly resource areas where customers can concentrate on skill building and career enhancement while their children and dependents are in a safe and secure environment;
- Partnerships with K-12 education to assist schools with career exploration and providing information to the next generation of the workforce, enabling them to make educated and informed career decisions based on data and workforce demand; and
- Collaboration with local media outlets such as radio and print media to market services and disseminate other workforce information.

Since 2015, Colorado has enhanced the alignment of programs within local areas, formalized training opportunities and professional development for staff of all programs, and developed a comprehensive approach to work-based learning as a core workforce strategy.

Weaknesses

There is room for improvement in all things and the workforce system in Colorado is no different. Opportunities for enhancement include:

- Braiding Funding: There are localized examples of effective braiding of funds across myriad programs, and in this environment of reduced federal resources the imperative to scale promising models is very high.
- Story telling: While the workforce network has enhanced its messaging and developed a unified identity that is understood within the network, the awareness of the system benefits and impact is still not well understood by critical outside stakeholders.

C. State Workforce Development Capacity

Colorado has a well-coordinated workforce system that, at the state level, is anchored by the Governor Polis administration and its focus on cross-agency collaborative work. Statewide bold goals have been developed and the workforce system plays a critical role in preparing the workforce needed to achieve those goals. Agencies are in close coordination with one another and work collaboratively to plan training activities, set goals, and examine progress towards achievement. Training on the Four Disciplines of Execution has been provided to all state agencies, and these concepts have been applied throughout the local workforce areas and state entities to achieve better results.

Colorado has also adopted a network mindset, and that includes community-based organizations, education partners, and libraries as key components in the system. The need to support workers and businesses remains high in a labor shortage environment, and it is only through collaboration that the network is able to meet the need and realize success.

Finally, Colorado is focused on enhancing its use of evidence to inform workforce development strategies and to influence the design and execution of initiatives. By measuring progress and the results of implementation, the state overall and each local area will be able to collect data that can move our work along an evidence continuum. When we refer to an 'evidence-based' program or strategy, it is helpful to have a shared definition. Evidence of effectiveness exists on a spectrum, including:

1. Strong evidence: meaning at least two evaluation reports have demonstrated that an intervention or strategy has been tested nationally, regionally, at the state- level, or with different populations or locations in the same local area using a well-designed and well-implemented experimental design evaluation (i.e., Randomized Controlled Trial (RCT)) or a quasi-experimental design evaluation (QED) with statistically matched comparison (i.e., counterfactual) and treatment groups. See CLEAR.dol.gov for full definitions of strong or moderate study design. The overall pattern of evaluation findings must be consistently positive on one or more key workforce outcomes. The evaluations should be conducted by an independent entity external to the organization implementing the intervention.

2. Moderate evidence: meaning at least one evaluation report has demonstrated that an intervention or strategy has been tested using a well-designed and well-implemented experimental or quasi-experimental design showing evidence of effectiveness on one or more key workforce outcomes. The evaluations should be conducted by an independent entity external to the organization implementing the intervention.

3. Preliminary evidence: meaning at least one evaluation report has demonstrated that an intervention or strategy has been tested using a well-designed and well-implemented pre/post-assessment without a comparison group or a post-assessment comparison between intervention and comparison groups showing evidence of effectiveness on one or more key workforce outcomes. The evaluation may be conducted either internally or externally.

4. Pre-preliminary evidence: meaning there is program performance data for the intervention showing improvements for one or more key workforce outputs or outcomes.

For interventions at each tier of evidence, Colorado will focus on leveraging administrative data analysis or increasingly rigorous evaluation to build new evidence, improve programs and participant outcomes, and progress to the next tier to further enhance the overall capacity of our network.

B. STATE STRATEGIC VISION AND GOALS

1. Vision

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

Governor Polis has focused on four key issues: tax reform and economic development, energy and renewables, health, and education and workforce. A priority area for fulfilling this vision is ensuring all Coloradans have access to opportunities for quality, life-long education connected to the future of work. This overarching vision for the state is in alignment with the vision of the Colorado Workforce Development Council (CWDC), which is charged with aligning the efforts of economic development, education, workforce development, government and business stakeholders at the local, regional and state levels. The CWDC vision is that ***every Colorado***

employer has access to a skilled workforce and every Coloradan has the opportunity for meaningful employment, resulting in individual and statewide economic prosperity.

CWDC ensures the strategic vision for the workforce system remains relevant by convening partners, leveraging resources and working to remove communication and regulatory barriers in order to help businesses create jobs, retain jobs and access a highly competitive workforce. It is CWDC's mission ***to enhance and sustain a skill-based talent development network that meets the needs of employers, workers, job-seekers, and learners for today and tomorrow.***

The CWDC has also adopted values that guide how the work of the talent development network is completed. Those values are: Equity, Agility, and Integration.

2. Goals

GOAL A: ALIGN STATE POLICIES AND FLEXIBLE RESOURCES TO ENSURE ALL COLORADANS HAVE EQUITABLE ACCESS TO OPPORTUNITIES FOR QUALITY, LIFE-LONG EDUCATION CONNECTED TO THE FUTURE OF WORK.

The Colorado workforce development system is building on its strong foundation to ensure that all Coloradans have access to opportunity. From this base, it is time to ensure that as a state we provide flexible resources to ensure Coloradans have equitable access to life-long learning opportunities connected to the future of work. To ensure success Colorado is committed to formulating, testing and scaling the braiding and blending of funding across programs, as well as exploring pay-for-performance contracting and alternative sources of capital for the system. To accomplish this goal we recognize the need to enhance the execution of SNAP 50/50 to ensure all communities are maximizing their available resources. We also recognize the need to promote collaboration models between Colorado Works and workforce programs to ensure attainment of aligning state priorities and flexible resources to ensure all Coloradans have access to opportunities for quality, life-long education connected to the future of work.

GOAL B: INCREASE THE AWARENESS OF THE TALENTFOUND NETWORK SO MORE INDIVIDUALS AND BUSINESSES UTILIZE THE AVAILABLE RESOURCES

In order to increase the impact of the TalentFOUND Network and tell the story of the entire system, Coloradans must be informed of the array of services and resources available to them through My Colorado Journey. To do so will require increasing the flow of individuals into the TalentFOUND network through educator training on existing resources, including My Colorado Journey, and career advisor training. To support this training it will be imperative to map and promote in-demand industries in future-ready ways and explore how we can embed work-based learning and apprenticeship opportunities throughout Coloradans life-long education journey.

GOAL C: PROMOTE CAREER NIMBLENESS AND AGILITY FOR ALL COLORADANS

Throughout the process of developing goals and strategies for this plan, there was significant engagement and collaboration among state-level program leaders. It was clear throughout the process that there is a push for all programs and partners to promote career nimbleness and agility for all Coloradans. To do so will require a statewide focus on career attachment strategies with a path to prosperity. This will also include an emphasis on creating lifelong upskilling opportunities that incorporate earn and learn approaches so individuals do not have to sacrifice income to increase their skills.

GOAL D: STRENGTHEN PARTNERSHIPS TO ADDRESS JOB QUALITY AS WELL AS INDIVIDUAL AND COMMUNITY LEVEL ISSUES IMPACTING ECONOMIC MOBILITY

Goal D is focused on addressing job quality and issues that impact economic mobility. To achieve this goal will require strengthening partnerships that can help address these issues. This will be accomplished by providing better service to individuals in need of support by strengthening the alignment and information sharing across all programs. Colorado is committed to developing an increasingly evidence-based workforce system, and specifically, is working to incentivize the use of evidence-based interventions by offering flexible award sizes, time periods, and performance measures, and continuing to build evidence of what works in Colorado.

Strengthening partnerships will also require supporting local boards to engage businesses and key employers to address community issues that induce childcare, transportation,and affordable housing.

A cross-functional work group comprised of state and local staff was convened to identify and implement strategies for achieving the above stated goal. Colorado has utilized, and will continue to utilize, the following strategies for identification, outreach, recruitment, and service delivery for individuals with barriers to employment:

- **Data Quality** - It is imperative that processes for the collection and reporting of relevant data are functioning effectively in order for Colorado to reliably demonstrate service to targeted groups. The aforementioned work group reviewed the functionality of Colorado's data management and reporting system to ensure its capacity to accurately gather and report this information.
- **Streamlining Intake** - The work group studied the various intake processes in Colorado's local workforce areas with an eye toward maximizing customer value and minimizing waste. The group recommended that unnecessary steps, forms, and functions be discontinued.
- **Partnerships** - Reaching and serving our state's most vulnerable populations requires strong, effective working relationships among the programs and agencies that make up Colorado's talent development system. State staff has worked, and will continue to work, to foster these partnerships in order to build referral systems and collaborative service delivery platforms that allow for quality wraparound services.

The following charts detail Colorado's progress in serving the agreed-upon population groups:

Active Title I Adults					
	4/1/14 - 3/31/15	**4/1/15 - 3/31/16**	**4/1/16 - 3/31/17**	**4/1/17 - 3/31/18**	**4/1/18 - 3/31/19**
Not HS Graduates	**80**	**145**	**205**	**150**	**214**
Low Income	**1294**	**1643**	**1807**	**1105**	**2302**
Offender	**260**	**348**	**439**	**279**	**584**
Single Parent	**418**	**506**	**652**	**382**	**862**
Veteran	**216**	**260**	**175**	**129**	**276**
Public Assistance (not TANF)	**617**	**912**	**1110**	**657**	**1322**

Active Title I Adults					
Active Title I Dislocated Workers					
	4/1/14 - 3/31/15	**4/1/15 - 3/31/16**	**4/1/16 - 3/31/17**	**4/1/17 - 3/31/18**	**4/1/18 - 3/31/19**
UI Exhaustee	**75**	**130**	**95**	**44**	**69**
Veteran	**124**	**247**	**192**	**77**	**153**
Single Parent	**138**	**224**	**218**	**97**	**203**
Displaced Homemaker	**23**	**46**	**37**	**17**	**24**

Active Title I Youth					
	4/1/14 - 3/31/15	**4/1/15 - 3/31/16**	**4/1/16 - 3/31/17**	**4/1/17 - 3/31/18**	**4/1/18 - 3/31/19**
Out-of-School Youth	**850**	**1540**	**1409**	**1040**	**2341**
Dropout	**428**	**760**	**785**	**592**	**1358**
Offender	**182**	**331**	**280**	**195**	**469**
Basic Skills Deficient	**767**	**1208**	**1046**	**585**	**372**
Pregnant or Parenting	**225**	**435**	**414**	**293**	**600**

3. Performance Goals

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

Performance measurements are negotiated annually with the US Departments of Labor and Education. Colorado will develop proposed targets for the applicable performance measurements for PY 20 and PY 21. This state plan will be updated as performance targets are negotiated in each program year based on the negotiation process with the federal departments.

4. Assessment

Describe how the State will assess the overall effectiveness of the workforce development system in the State in relation to the strategic vision and goals stated above in sections (b)(1),

(2), and (3) and how it will use the results of this assessment and other feedback to make continuous or quality improvements.

Colorado is focused on enhancing its use of evidence to inform workforce development strategies and to influence the design and execution of initiatives. The vision and goals discussed above are theory-informed. By measuring progress and the results of implementation, we will be able to collect data that can move our work along an evidence continuum. Where needed, assessment plans will be developed by the CWDC in partnership with all system programs. The assessment plans will include measurable goals, progress benchmarks, and specific indicators that will be used to monitor progress. Through ongoing WIOA Implementation Team meetings strategies will be assessed for their performance and the implications of that performance on the system overall in relationship to the overarching goals and specific program performance measurements. Internal and external evaluation work will also be conducted to ensure fidelity in our work and improvement in the quality of implementation.

C. STATE STRATEGY

1. Describe the strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B), (D). "Career pathway" is defined at WIOA section 3(7) and includes registered apprenticeship. "In-demand industry sector or occupation" is defined at WIOA section 3(23).

Sector Strategies

Colorado industry-led sector partnerships continue to be a proven strategy for growing Colorado's regional economies. Colorado sector partnerships are highly effective when they are operated in a regional labor market, led by business, focused on industry identified priorities, supported by public partners from multiple organizations, organized for long term success, and achieve meaningful and measurable results. Businesses, job seekers, and students thrive exponentially when systems come together to solve challenges facing their communities.

Colorado sector partnerships are tackling tough challenges in their communities, including early childhood education, K-12 and postsecondary education, workforce development, economic development, transportation, and housing. These challenges are met with a proven methodology of next-generation sector partnerships to not only address the workforce, but also other competitive and community needs.

With Colorado's strong sector strategies approach to building and sustaining 30 sector partnerships since 2015, it is no surprise that businesses and public partners continue to engage in building the talent pipeline for future workers. Ten industries in Colorado have recognized that in order for their industry to thrive they must be actively involved in creating a talented workforce that meets their demand for a high-quality workforce. As a result, sector partnerships are experiencing an increase in work-based learning programs and initiatives.

More than 880 business partners and 360 public partners are involved with sector partnerships by either participating as a convener, industry champion, adviser, or sponsor or by attending a variety of sector partnership events. In 2019 sector partnerships collaborated on industry-led initiatives with businesses, workforce, education, and economic development.

Building Industry-Driven Career Pathways Systems in Colorado

The Colorado Model: In Colorado, industry-driven career pathways ensure that education, training, and workforce systems stay deeply attuned and responsive to the needs of the labor market, preparing students and workers with the skills and credentials they need for jobs and careers.

- What is a career pathway system?

A career pathway system aligns public partners and engages them in a continuous conversation that is led by industry to ensure that jobseekers and students move seamlessly through and among support programs, educational institutions, training opportunities, and work-based experiences to build skills and credentials that meet industry demand and prepare them for jobs and careers. In Colorado, a sector partnership is the vehicle for building industry-driven career pathway systems, providing a forum for productive and ongoing collaboration with industry and among workforce, education, training partners, and other community partners. In Colorado, the statewide career pathway system aligns career pathway programs and systems developed throughout high demand industries in each economic development region of the state.

- What's the difference between a career pathway system and a career pathway program?

A career pathway program offers a clear sequence of stackable credits and credentials, combined with support services, that enables students and jobseekers to secure industry-relevant skills, certifications, and credentials and advance to higher levels of education and employment in high demand occupations. A career pathway system is made up of multiple career pathway programs that span educational institutions, workforce and support service partners. These programs are all oriented around a shared understanding of the needs of industry. Often times, tools like career pathway maps are used to talk with students and job seekers about how they can progress through education and training experiences to obtain employment that meets his or her goals. Statewide career pathway maps focusing on the top industries in Colorado will be accessed on Careers in Colorado and My Colorado Journey.

- What is a sector partnership and why do they matter for career pathway systems?

In Colorado we've defined a sector partnership as an industry-specific regional partnership led by business in partnership with public partners in economic development, education, workforce development and community support partners. In Colorado, industry-led sector partnerships are the vehicle for aligning public partners with industries' needs in an effective, results-driven manner. They provide the "home" for career pathway systems-building, engaging industry leaders and public partners in a continuous dialogue to ensure that education and training systems respond to industry needs.

Summary: Step-by-Step Guide to Building Regional Career Pathway Systems

1. Build a regional, industry-led sector partnership

Sector Partnerships are the vehicle for productive engagement with industry leaders and the starting place for career pathways systems-building. Use the sector partnership specifically, the education, talent or workforce committee as the driver of career pathways systems-building efforts.

- Goal: Establish strong industry ownership over career pathway development. Beyond asking for one-time input into a program, engage industry as full partners in building

and contributing to a talent development system that will prepare the workforce they need, now and in the future.

- Outcome: A core group of committed industry leaders willing to champion the development of a career pathway system for industry.
- Role of business leaders: Identify and champion talent development as an important priority for the growth and competitiveness of their sector.
- Role of public partners: Working as a regional team, partners from education, workforce, and economic development collaborate with industry to launch and support an industry-led partnership.

2. Build out a career pathway support team of non-industry, partners

Prepare them with the right expectations. Non-industry public partners might include key decision makers in workforce development, secondary education, post-secondary education, human services, vocational rehabilitation, and other community partners. This includes what they will get from employers: real-time information on critical occupations and competencies as well as a willingness to partner in providing work-based learning and other training resources. It also includes a clear explanation of how they're expected to work together as workforce, education, and training systems to respond to industry demand.

- Goal: Build buy-in and support among workforce, education, training partners, and other community support partners preparing them to develop a coordinated response to industry's talent needs.
- Outcome: A career pathway "support team" made up of workforce, education and training partners, human service, vocational rehabilitation, and other community support partners. This team will act as the joint decision-making body for responding to industry needs and determining how systems and programs should connect to one another at each level of a career pathway to collectively meet the needs of the targeted industry.
- Role of business leaders: None at this point.
- Role of public partners: Recruit workforce, education and training partners to participate on the career pathway support team, ensuring participation from key programs that prepare students and workers for in-demand careers in the targeted industry and provide them with the necessary supports to be successful in the career pathway.

3. Identify critical occupations

Based on labor market data and qualitative input from employers.

- Goal: Target a set of occupations that industry leaders agree are critical.
- Outcome: A list of occupations that industry agrees are critical; new support team members, drawing from education and training programs that relate to the targeted occupations.
- Role of business leaders: Convene to review labor market data and agree on a set of occupations that are critical to the industry.

- Role of public partners: Listen to industry-led conversations and consider opportunities to adapt programs to more closely align with industry needs as well as potential linkages across programs.

4. Inventory relevant education, training, and workforce programs

That prepare students and workers for those occupations, mapping any existing linkages among those programs.

- Goal: Identify what programs already exist and start to identify gaps that need to be filled in order to best meet the demands of industry, students, and workers. Build out the career pathway support team with leaders from those programs.
- Outcome: An inventory of education and training programs that prepare students and job seekers for the critical occupations identified by industry. A support team including relevant workforce, education, training and support programs.
- Role of business leaders: Vet the program inventory to ensure key partners are included.
- Role of public partners: Inventory and document all education, training and workforce programs that have a role to play in preparing students and jobseekers for the targeted industry. Take stock of any existing linkages among programs (e.g. articulation agreements or dual enrollment) and begin to identify opportunities for stronger linkages among programs. Recruit new support team members, drawing from those programs.

5. Understand critical competencies required to perform effectively on the job

Industry-defined competencies are the specific knowledge, skills and abilities that industry leaders have collectively identified as being critical to performing a specific occupation or group of occupations effectively. Based on these competencies, develop occupational descriptions that both inform employers' hiring practices as well as education and training partners in modifying curriculum and assessing students.

- Goal: Get the real story from employers about what is required to perform on the job, identifying both foundational and task-specific competencies.
- Outcome: Occupational descriptions for each targeted occupation, written to inform employer hiring practices as well as curriculum, program design, and program offerings.
- Role of business leaders: For each targeted occupation, hiring managers and high-performing employees convene to identify competencies. Business leaders also identify ways to contribute work-based learning experiences to pathways.
- Role of community partners: Partners listen in to sessions with hiring managers and high-performing employees to identify specific opportunities to strengthen existing programs and build stronger linkages across programs to align with industry needs.

6. Build career pathway programs that prepare students and jobseekers with critical, competencies

Based on an understanding of what competencies are required to perform effectively and advance in the industry, build career pathway programs that prepare students and jobseekers with those critical competencies. This includes building linkages among programs and

institutions, integrating support services into programs, and augmenting classroom training with work-based experiences throughout the pathway.

- Goal: Develop seamless linkages among programs and institutions that support students and job seekers in building the competencies, credits, credentials they need to secure jobs and careers in the targeted industry.
- Outcome: Career pathway programs that target high-demand occupations or groups of occupations.
- Role of business leaders: Advise community support partners on career pathway program development. Contribute work-based learning opportunities.
- Role of community partners: Build stronger connections across programs and institutions to help students move seamlessly through pathways and ensure that competencies are developed that meet the needs of businesses. Advise students and job seekers on pathways that include training and supports needed to successful in critical occupations.

7. Share Career Pathway with Students and Jobseekers

- Goal: Use career pathway system to equip students and jobseekers with the relevant critical skills for high demand jobs. Use assessments and career pathway maps to help students and job seekers identify industries of interest and map out a path that includes the relevant training and work experience to be successful in their chosen career.
- Outcomes: Training, support and guidance for students and job seekers that aligns with the needs of industry.
- Role of business leaders: Hire students and job seekers for critical occupations. Provide public partners feedback about incoming skills and preparation of new employees.
- Role of public partners: Implement career pathways and help students and job seekers effectively navigate career pathways, incorporating support as needed. Collect and apply feedback from business, students, job seekers to refine programs and ensure they maintain alignment with the needs of industry and are relevant and accessible for students.

8. Create a system for continuous improvement

Use the sector partnership as the place to continuously develop and update your career pathways system. This includes ongoing conversations with employers to identify and understand high-priority workforce needs as they evolve, and continued collaboration among public partners to develop and update a systems approach in response.

- Goal: Keep career pathways updated and relevant, ensuring education and training systems stay attuned and respond to the changing needs of the labor market.
- Outcome: Career Pathways Action Plan, with employer champions and support partners committed to specific actions that align education and training with industry needs and support students in building skills and earning credentials with labor market value.
- Role of business leaders: Provide on-going feedback to ensure career pathways programs are aligned with the current needs of industry. Continue to contribute to career pathway programs through work-based learning.

- Role of public partners: Update career pathway programs to maintain relevance and alignment with industry needs. Continue dialog with other public partners to continue building and refining career pathway programs to ensure that they are responsive to the needs of industry and relevant and accessible to students and jobseekers.

Appendix: Defining Terms

Career Pathway System - A career pathway system engages education and training providers in a continuous conversation with one another and with industry to ensure that students move seamlessly through and among educational institutions and work-based experiences to build skills and credentials that meet industry demand and prepare them for jobs and careers.

Career Pathway Program - A career pathway program is a set of stackable credits and credentials, combined with support services, that enables students to secure industry-relevant skills, certifications, and credentials and advance to higher levels of education and employment.

Career Pathway Map - An online or paper map of how occupations connect to one another and what education and training is needed to prepare students or jobseekers for occupations.

Sector Partnership - An industry-specific regional partnership led by industry in partnership with public partners.

Public Partners - A regional group of non-industry partners engaged in a sector partnership who work together to develop a coordinated response to the needs of industry. Partners include decision makers in workforce development, secondary education, post-secondary education, human services, vocational rehabilitation, and other community partners.

Industry-defined competencies - The specific knowledge, skills and abilities that industry leaders have collectively identified as being critical to performing a specific occupation or group of occupations effectively. These competencies are both foundational and task specific.

Work-based Learning

A critical component of career pathway programs is work-based learning. Embedding work-based learning opportunities into the context of a guided program that comes with supportive services and yields stackable credentials creates the best outcomes for job seekers. This component is critical enough that it requires a specialized focus in this state plan. Colorado's labor market is evolving faster than ever, demanding a labor force with a flexible and continuous approach to developing and upgrading skills. Addressing the evolving needs of businesses and ensuring Coloradans have pathways to the middle class requires:

- Ongoing learning and skill development opportunities for individuals
- Building and leveraging cross-sector public-private partnerships
- Support for the education and training system in the development of stackable credentials aligned with the demands of industry

We know that one of the most effective ways to prepare individuals for jobs is to give them real world experience. Work-based learning is a strategy that combines skill development with real world training opportunities. Apprenticeships and other work-based learning activities create opportunities for youth and adults to develop the skills needed to succeed.

Colorado has designed a Work-based Learning Continuum that illustrates the variety of work-based learning activities that can be pursued, as well as the dynamics of which activities are

housed primarily within educational entities, which are located on a job site. As practitioners have begun utilizing this tool, it has brought clarity about the roles of different stakeholders and enhanced communication between the partners.

The number of initiatives focused on accelerating the creation of work-based learning opportunities continues to grow. To highlight a few of the key initiatives underway in Colorado:

- CareerWise Colorado is a youth apprenticeship program, which welcomed its inaugural cohort of students in the fall of 2017, with 121 students apprenticing across 42 businesses. By fall 2019 this number grew to 435 enrolled apprentices across 113 businesses.
- Registered Apprenticeships (RAs) through the USDOL Registered Apprentice System, is working to expand the types of occupations and the number of opportunities in high-demand fields. USDOL has recognized Colorado's leadership in RA growth by awarding the State Apprenticeship Expansion (SAE) continuation grant ($1,089,989) in June 2018 and the Apprenticeship State Expansion (ASE) grant ($1,356,234.35) in July 2019. Through the department's expansion efforts, the grant has placed over a thousand participants in registered apprenticeship programs, pre-apprenticeships, and youth apprenticeship programs.
- In 2015, House Bill 15-1230 created the Innovative Industries Internships Workforce Development Program, now known as the Innovative Industries Internship Program, to incentivize employers in growing Colorado industries to increase paid internships and support a consistent and experienced talent pipeline.
- Denver Opportunity Youth Initiative, supported by the Denver Metro Chamber of Commerce, is aimed at providing education, career opportunities and support systems to opportunity youth by partnering with nonprofit, government, and business organizations to create a pipeline to meaningful work experiences and careers.
- As a result of Senate Bill 19-171, CDLE will implement a directory of all registered apprenticeship programs in the state of Colorado. This directory will provide job seekers, workforce staff, and other work-based learning stakeholders with timely and accurate information about apprenticeship programs in their areas.

Finally, Colorado has created a definition of a *Thriving Work-Based Learning Community*. This concept is defined as a community that understands the problems plaguing their talent pipeline, recognizes the value in business-led work-based learning as a solution, and works collaboratively to effect systemic change. Work-based Learning Communities can exist in one of four phases: Exploring, Emerging, Demonstrating, and Thriving. The phase a specific community is in, is based on the activities that are in place across seven domains: Leadership, Needs Analysis, Asset Mapping, Stakeholders, Resources, Communications, and Evaluation. Financial resources are being devoted to local communities seeking to build the infrastructure necessary to make this work happen.

Two-Generation Approaches

Career Pathway Programs are also more sustainable and effective for job seekers when a two-generation approach is taken and the entire family is served through programming and relevant resources. Colorado joined an NGA Policy Academy on two-generation strategies in 2017 and has created a state guide that supports the implementation of best practices. Workforce Development Boards are encouraged to consider two-generation approaches within their

programs to design partnerships with other agencies and service providers that can seamlessly meet the needs of the whole family.

Early Childhood Education

A component of two-generation approaches often involves meeting the childcare needs of children ages 0 - 5. When a parent does not have a trusted, affordable provider of care for their children, they cannot engage effectively in work, education, or training programs. Yet, many communities do not have adequate childcare space available due in part to a lack of access to an effective, consistent childcare workforce in whom families can place their trust, and with whom young children can thrive. The lack of affordable childcare has become an economic issue in Colorado, as it is a contributing factor to the supply issue that companies are facing for talent.

Solutions are best designed by local communities that take into account the unique circumstances of an area. Workforce Development Boards are encouraged to partner with Early Childhood Councils and local programs to examine ways they can impact this issue in their community. *Colorado's Early Childhood Workforce 2020 Plan* specifically names local boards as potential partners in the efforts to recruit and retain a high quality workforce, and the plan contains strategies that can be pursued in the next three years.

Employment First

Career Pathways will fall short of meeting the talent needs in Colorado if they are not available to all potential employees, including individuals with disabilities. Colorado has enhanced its focus on mobilizing the untapped talent of individuals with disabilities by enacting state legislation regarding the concept of Employment First. Employment First is based upon the premise that all people, including people with the most significant disabilities, are capable of full participation in employment and community life. It includes:

- The prioritization of employment as the first and preferred outcome for all working-age persons with disabilities, regardless of level of disability;
- A state-level systems change framework, resulting in increased, successful employment outcomes for people with disabilities;
- The alignment of employment-related policies, service delivery practices, and service funding structures between state agencies; and
- Promoting employment as defined by Workforce Innovation and Opportunity Act language describing Competitive Integrated Employment (employment within businesses typically found in the community with regular compensation, the same opportunities for advancement and interaction with nondisabled coworkers to the same extent as other employees in comparable positions interact, i.e., a fully integrated workplace).

In 2017, the Employment First Advisory Partnership (EFAP) was convened, representing a multi-disciplinary state team with a focus on implementing the Employment First approach with fidelity through the alignment of policies, coordination of resources, and updating of service delivery models to facilitate increased integrated employment outcomes for people with disabilities, including people with the most significant disabilities. A strategic plan was released by the partnership that includes recommendations for actions that the state and local communities can take to make Employment First a reality throughout Colorado. As state and local plans and programs are developed, these concepts should be taken into consideration in order to design the best workforce system possible that works for all Coloradans.

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

Strategic Priorities for 2020 - 2023

Priority A: Align state policies and flexible resources to ensure all Coloradans have equitable access opportunities for quality, life-long education connected to the future of work.

- Strategy A.1: Formulate, test, and scale the braiding and blending of funding across programs.
- Strategy A.2: Enhance the execution of SNAP 50/50 so that all communities are maximizing available resources.
- Strategy A.3: Promote collaboration models between Colorado Works and workforce programs.
- Strategy A.4: Develop and strengthen programming to support targeted populations.

Priority B: Increase the awareness of the TalentFOUND Network so more individuals and businesses utilize the available resources.

- Strategy B.1: Educate Coloradans on targeted in demand career pathways through the enhancement of My Colorado Journey.
- Strategy B.2: Increase the flow of individuals into the network through educator training on existing resources and career advisor training.
- Strategy B.3: Map and promote in-demand industries in a future-ready way with embedded opportunities for work-based learning and apprenticeships.
- Strategy B.4: Tell the story of the system.

Priority C: Promote career nimbleness and agility for all Coloradans

- Strategy C.1: Focus on career attachment strategies with a path to prosperity.
- Strategy C.2: Create lifelong upskilling opportunities with earn and learn approaches so that individuals do not have to sacrifice income to increase their skills.

Priority D: Strengthen partnerships to address job quality as well as individual and community level issues impacting economic mobility.

- Strategy D.1: Better serve all individuals in need of support by strengthening the alignment and information sharing across programs.

- Strategy D.2: Support local boards in engaging businesses and key employers to address community issues including childcare, transportation and affordable housing.

III. OPERATIONAL PLANNING ELEMENTS

A. STATE STRATEGY IMPLEMENTATION

1. STATE BOARD FUNCTIONS

The Colorado Workforce Development Council (CWDC) is comprised of business, workforce, and government representatives throughout the state who represent key industries and programs instrumental in the successful implementation of the public workforce development system in Colorado. The CWDC is administratively housed within the Colorado Department of Labor and Employment and serves as a coalition of the state departments of Education, Higher Education, Economic Development and International Trade, Human Services, Corrections, Local Affairs, and others. All members are appointed by the governor to a three year term and per bylaws members can serve two terms.

The full council meets in person three times a year to discuss and approve strategy and policies, observe successful initiatives in action in various locations across Colorado, and generate solutions to issues facing the system. The CWDC has an active executive committee, which meets four times per year, as well as an Industry Committee, an Education & Training Committee, and an Advocacy Committee that meet throughout the year, each of which have sub-committees and task groups made up of local and state partners working together on specific strategies. A list of all board members can be found on the CWDC web site. (www.colorado.gov/cwdc).

The CWDC is supported by a managing director and a staff of 15 people that are involved in day-to-day implementation of key initiatives. On an ongoing basis, staff members develop and implement workplans that operationalize the required functions of the state board. Information is brought to the CWDC at regular meetings for action and to the Executive Committee as appropriate. Information is communicated to the public through quarterly newsletters and regular updates to the CWDC's website (www.colorado.gov/cwdc).

With the increased focus on work-based learning as a critical element in Career Pathways, the CWDC also partners with and supports the Governors Business Experiential Learning Commission (BEL). The managing director and chair of the CWDC both serve as BEL Commissioners, and the CWDC staff provides support to the commission, committees and work groups of the BEL Commission.

2. IMPLEMENTATION OF STATE STRATEGY

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

Colorado has a long history of coordinated implementation as a result of the Governor's 1996 Executive Order to integrate employment and training services in local One-Stop Delivery systems. All state policies that have followed have been designed to ensure that the local workforce areas and key partners are aligned with the strategic direction of USDOL, the Governor, and the Colorado Workforce Development Council. Colorado has excelled as one of three demonstration states for devolving Wagner-Peyser services to locally administered merit systems, fully embracing the key principles of the Workforce Innovation and Opportunity Act. This has allowed our statewide network of locally operated workforce centers to achieve total

integration of Workforce Investment Act, Wagner-Peyser, veterans, and Trade Act employment and training programs, as well as launch state and local partnerships with TANF, SNAP, Adult Education and Family Literacy, Vocational Rehabilitation, and other required partners for the one-stop system.

With the implementation of WIOA, specific strategies have been utilized to align the work of core and required partners at both the state and local level. Leadership from the one-stop partner programs comes together monthly as an Implementation Team to provide guidance on the work and make commitments to specific actions necessary for moving forward. MOUs between agencies will be implemented as needed to support the alignment of efforts and activities.

Over the next four years, several tactics will be deployed to achieve the ambitious goals outlined in this plan. Businesses are engaged in the talent development system through sector partnerships and through our statewide business services team. To continue the excellent work that has been done over the past three years, one-stop partner programs will be included in the business services team and common procedure manuals will be developed to align the work of multiple agencies. The roles of partners and the resources they can provide are brought to the table to serve businesses through our overall sector strategy approach.

By providing intensive technical assistance to focus the workforce areas on the key industries that drive their local and regional economies and provide the spark for increasing economic vitality, Colorado has taken the next step in implementing its long-term sector strategy approach to system transformation. The local boards will convene local decision makers and respond to the recruitment and retention issues of these industries. Successful sector partnerships are aligned with career pathways strategies and the Colorado Community College System, and designed to address the skill upgrade needs of low-skilled adults. Sector strategies serve as the driver for all discretionary initiatives funded by the Colorado Workforce Development Council, as well as those that will be funded with Dislocated Worker 25% dollars.

Through this strategic planning process the clear need for staff development for all system partners has been made apparent. Therefore, Colorado will develop training toolkits and implement cross-agency training to ensure that all of the resources of the system can be funneled appropriately to customers. The expertise of specific partners will be utilized, such as having adult education and family literacy programs provide training on assessment delivery to workforce center staff and using DVR's expertise to provide disability awareness and etiquette to core and combined partner staff.

Additionally, a commitment to innovation exists throughout Colorado and a framework will be developed for pilot projects that will allow for adequate, reliable, and safe experimentation to take place. Partner programs are also committed to scaling successful innovations and the necessary structures, guides, and training will be deployed to ensure that it is feasible to broaden successful programs.

While all of these initiatives will enhance the services that existing customers and those who are funneled to programs receive, the full vision of WIOA cannot be realized unless the system overall is understood as an asset and utilized as a resource by a much broader base of businesses and jobseekers. All of the agencies responsible for programming under this combined plan are committed to the branding initiatives that will take place and will appoint the right staff with communications expertise to collaboratively achieve this goal. The Advocacy Committee of the Colorado Workforce Development Council will provide the vehicle to launch these efforts and will support the implementation of awareness strategies throughout the state.

B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

The CWDC serves as the convener of all partner agencies, both state and local, that compose the Talent Development System in Colorado. Regardless of a program's status in regards to this combined plan, all entities are invited to strategic conversations on implementation through the WIOA Implementation Team as well as through the regular CWDC meetings. Specific initiatives are in place to support sector partnerships and career pathways and the events and committees are open to all interested parties.

In 2017, the CWDC began hosting quarterly Education & Training Learning Circles, which feature presentations on new and innovative programs and a question and answer designed to create more alignment across programs. These Learning Circles are open to all community partners, not just WIOA partner programs. The CWDC also works with partners, such as Skillful and CareerWise, to support the alignment of their work to promote skills-based hiring and youth apprenticeships, respectfully, with the public workforce system.

In 2019, the CWDC implemented TalentFOUND Quarterly Conversations, which bring together workforce boards with other partners in the TalentFOUND network to discuss opportunities for collaboration and to implement concepts with a variety of partners. To date these conversations have brought workforce centers and board members into closer dialogue with: chambers of commerce, economic development corporations, post-secondary education institutions, and county human service offices. The topics for future conversations are selected by the CWDC Advocacy Steering Committee.

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

Job seekers in Colorado are served by the statewide network of workforce centers as well as by the myriad government, education, and nonprofit organization locations of one-stop partner programs. All comprehensive workforce centers offer the full range of WIOA Title I-B, Wagner-Peyser, Veterans, and TAA services in a co-located model, and many local areas across the state have other partners co-located as well.

Regardless of location, customers of the public workforce system receive high-quality services designed to meet their specific needs. In a number of offices, the first question a customer hears is "What brings you in today?", which creates a welcoming environment and sets up staff members to serve the highest need of the customer in the fastest amount of time. Within the parameters of each statutorily defined program, Colorado has implemented special initiatives to provide comprehensive, customized and coordinated services to targeted populations with barriers to employment.

UI Claimants, Long-Term Unemployed, Under-Employed, Dislocated Workers, Trade Displaced Workers, Displaced Homemakers

Workforce Development Programs/UI Strategic Partnership - The Colorado Department of Labor and Employment, Workforce Development Programs and the Unemployment Insurance Division have a long-standing partnership with co-location of staff members to coordinate reemployment initiatives for claimants and the long-term unemployed. The two programs work closely to strategically plan and support implementation of initiatives designed to benefit their shared customers. The largest joint endeavors include:

- Development of a strategic plan for reemployment initiatives:State and local stakeholder input was obtained on ways to improve communications and partnerships between the

workforce and UI systems. The information was used to develop annual and long-term goals to promote reemployment and a more seamless customer experience. These goals included reducing and maintaining the average duration of UI benefits from 15.2 weeks to 12 weeks by June 30, 2017, through enhanced data sharing between the UI and workforce databases, and implementation of Colorado's RESEA program.

    - Design and Implementation of Reemployment Services and Eligibility Assessment (RESEA): RESEA's focus is on engaging Unemployment Insurance claimants within the first 5 weeks of their first UI Benefit payment, to provide earlier workforce engagement and increased services to help expedite their return to work. RESEA was implemented in January 2016 and is active statewide.

- Displaced Homemaker Program: In addition to services available through Wagner-Peyser and the WIOA Dislocated Worker formula programs, State funds are utilized to provide employment and training services to eligible displaced homemakers who, through divorce, separation, widowhood, or ineligibility for other public assistance, have lost their source of economic support. The "Keep Envisioning Your Success (KEYS)" Scholarship is a partnership between Workforce Development Programs (WDP) and the Community College of Denver (CCD) to provide reemployment services to individuals who lost their primary source of income and must re-enter the labor market. Services include tuition scholarships, job training, career assessment, supportive services, personal and vocational counseling, and job development and placement. WDP has provided additional funding to enable CCD to increase KEYS Scholarships for summer students to help them achieve their educational goals faster and move towards successful employment, and this successful partnership will continue going forward.

Low-Income Individuals

- WIOA Adult Priority of Service: The state and all local workforce areas have adopted an adult priority of service policy that targets public assistance recipients, other low income individuals, and those who are basic skills deficient. This new WIOA requirement will ensure that the majority of Colorado's WIOA Adult customers will come from these priority populations.

- Colorado Works: Within the parameters of Federal regulation and State policy and rules, county human service departments have considerable flexibility in operating their Colorado Works program, particularly around the programming for those considered "work-eligibles". Many counties have found that robust partnerships with the one-stop center in their community is a natural fit that leverages the resources and employer-base available through the workforce development system for the benefit of Colorado Works participants.

Here is snapshot of the integration that was already in place prior to the passage of WIOA between workforce centers and Colorado Works programs:

Local Area	TANF Integration Exist Pre-WIOA	Method	TANF Integration Post-WIOA
Adams County	Yes	Service Delivery Integration	Service Delivery Integration
Boulder County	Yes	Service Delivery Integration	Service Delivery Integration
Arapahoe/Douglas Counties	Yes	Contracted	Contracted
Colorado Rural Workforce Consortium	Yes	Service Delivery Integration	Service Delivery Integration
City and County of Denver	Yes	Contracted	Contracted
Larimer County	Yes	Contracted	Contracted
Mesa County	Yes	Service Delivery Integration	Service Delivery Integration
Pikes Peak Workforce Area	No	Service Delivery Integration	
Tri-County Workforce Area	Yes	Service Delivery Integration	Service Delivery Integration
Weld County	Yes	Service Delivery Integration	Service Delivery Integration
Notes:	Service Delivery Integration means that departmental relationships exists between human services and workforce staff	Contracted means that the workforce center has a contract to run Colorado Works	

In several workforce development areas, the workforce system resides within the umbrella of the county human service department, and in some instances, full integration of these two systems is the norm for service delivery. This is the case in the Mesa county workforce development area, which shares boundaries with Mesa county, and is embedded into the county human service department in that area. One shared facility serves both WIOA customers as well as those seeking and receiving public assistance, and operations are fully integrated. In other areas, particularly in metropolitan communities, while workforce may sit outside the county human service governance structure, MOUs or contracts have been established for the provision of career services to Colorado Works participants within the workforce system. An example of this structure can be found in Larimer county, where human services and workforce are both

county operated, but reside in different departments. The Larimer County Workforce Center has long operated the Colorado Works program through a MOU with the county human service department, to notable results in employment entry for Colorado Works' participants. In both instances, human service agencies benefit from strong relationships to the employer, economic development, and resource base of the workforce system.

However, dozens of counties in the state of Colorado do not have a physical one-stop location, and the ability to conveniently access services is a critical one, particularly for customers who may lack transportation resources. In these areas, connection with the workforce development system may take the form of participation on the local workforce board, or informal referrals and relationships. Colorado's large geographic area, as the 6th largest state in the country, poses challenges to rural communities. The Colorado Rural Workforce Consortium continues to establish innovative approaches to help bridge these gaps through technology. The CRWC is excited to partner with the Future of Work Office as one of the key goals being explored is to empower individuals, employers, and communities to create their own digital transformation plan. Together, the CRWC and the Future of Work Office will build awareness and equip the rural workforce system with tools and strategies to increase their resilience through a digital transformation plan. One example of this is to hold regional convenings to share and inform the digital transformation framework.

Youth

Governor's Summer Job Hunt (GSJH): The GSJH is a statewide program that assists Colorado's young adults, ages 14-24, with career exploration and interest-based job search. During Calendar Year 2018, the GSJH served more than 41,000 young adults, with a 61 percent entered employment rate.

Funding for the program is provided through Wagner-Peyser 10% discretionary funds, provided by CDLE/Workforce Development Programs to the local workforce areas, primarily to cover staffing costs and costs for program outreach.

The GSJH will continue to utilize successful strategies such as:

- GSJH Website:https://www.colorado.gov/gsjh
- GSJH Facebook page: Utilized to promote local job fairs and workshops, state events, and partner events.https://www.facebook.com/govsummerjobhunt
- Think Big Youth Forum: An annual statewide youth service provider conference that typically includes over 200 people from the state and local workforce system, education and higher education systems, the Division of Vocational Rehabilitation, local youth councils, and many other state and local organizations.
- Teen Jobline 9: Colorado has a successful partnership with Denver NBC affiliate 9News TV station to host Teen Jobline 9 features staffed by representatives from the state and Denver metro area workforce centers to answer phone calls from parents, grandparents, guardians, and youth with questions about summer employment opportunities.
- Denver 7 Jobline: CDLE was approached by Channel 7, our Denver ABC affiliate, to host teen joblines.
- Career Preparatory Experiences, including resume preparation, mock interviewing, industry and career research, educational & training pathway development.

- Industry tours (Career Road Trips) targeted at growth industries, and hosted for youth, parents, and teachers.
- Entrepreneurial training and competitions
- STEM focused career awareness events and forums
- Sector partnership-based workshops, followed up with industry specific job fairs.
- Focused partnerships with Agencies and Organizations
- Focus on Work-Based Learning and Apprenticeship, including introduction to internships, pre-apprenticeship and registered apprenticeship. Local areas are coordinating with industry to host apprenticeship fairs and informational events for young adults.
- Targeted outreach within schools, partner organizations, community-based organizations, etc.
- Partnerships with youth serving organizations and foundations who focus on opportunity youth, professional development, etc.
- Monthly technical assistance calls and updates for the state-wide team of GSJH staff and interested parties, where updates are shared, presentations and technical assistance are offered, and local areas share promising practices and models.
- Data collection utilizing Google sheets in a team room environment to capture participation data for workshops, fairs, business participation, and other activity not easily reported through Connecting Colorado.

Individuals with Disabilities

Disability Employment Initiative (DEI) Grant

The DEI is a capacity building, systems-change initiative with strategies to assist state agencies and Workforce areas to provide effective and integrated Workforce Innovation and Opportunity Act (WIOA) services and improve programmatic and physical access to adults with disabilities.

The three strategic approaches are to

1. Increase access to and the participation of individuals with disabilities in WIOA funded employment and training services, particularly those related to career pathways, in partnership with Vocational Rehabilitation (VR) programs; community colleges and other education entities; human service agencies; and business partners;
2. Improve training and employment outcomes for individuals with disabilities and support businesses; and
3. Increase the number of workforce entities functioning as Employment Networks (EN). An EN is an entity that enters into an agreement with the Social Security Administration (SSA) to either provide or coordinate the delivery of services to SSA disability beneficiaries (Source; USDOL Fact Sheet DEI).

Grant amount: $2.25 million

Grant begins: October 01, 2017 and runs through September 30, 2020

Partners and members of the DEI Grant State Leadership Team:

- Colorado Workforce Development Council (Education & Training Committee), Colorado Department of Labor and Employment, and Division of Vocational Rehabilitation
- Colorado Department of Education, Adult Education Initiatives
- Colorado Department of Human Services, Office of Behavioral Health, Recovery Services
- Emily Griffith Technical College
- Arapahoe/Douglas Works!
- City and County of Denver, Office of Economic Development, Workforce Services
- Pikes Peak Workforce Center
- Broomfield Workforce Center

Outcomes: by September 2020 DEI partner Workforce areas will enroll a total of 216 (or greater) adults with disabilities into WIOA Adult and Dislocated Worker programs, provide increased outreach to businesses and provide seamless services to workforce center customers with disabilities.

Division of Vocational Rehabilitation (DVR): The focus of the DVR program is to provide individualized and customized services and supports to individuals with disabilities. DVR staff are subject matter experts who will commit to work with the staff of core and combined plan program partners to support their efforts to provide effective services to individuals with disabilities. DVR will strive to coordinate individualized DVR plans for employment with the plans developed for individuals by other core and combined plan partners, and assure that the DVR plan is complementary to these other plans, whenever feasible. Coordination between programs will be supported by working and, as appropriate, formal partnership agreements with state community partners to create referral processes and jointly deliver services to customers, including customers from unserved and underserved populations. At the local level, DVR will work with core and combined plan partners as well as other community resources, to reach out to unserved and underserved populations. Particularly, DVR will focus efforts on underserved youth (youth from the foster care, juvenile justice, and mental health systems), homeless individuals, and individuals with limited education. Finally, DVR will seek to coordinate and improve partnerships with Colorado's American Indian Vocational Rehabilitation Programs, the Ute Mountain Ute Tribe and the Southern Mountain Ute Tribe.

Adult Learners

As the entity responsible for management and oversight of Title II funds, the Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will work collaboratively with partners within the Combined State Plan to ensure effective and efficient career pathways for Coloradans. First, AEI will host regular Adult Workforce Partnerships Advisory Committee meetings with representation from core programs in Colorado's talent development system (as outlined in 22-10-106, C.R.S.). During these meetings, opportunities for collaborative planning and information sharing will occur. AEI will coordinate and promote activities that bring together adult education and family literacy providers with workforce, which may include joint meetings and trainings. AEI will develop and provide technical assistance for adult education and family literacy providers funded through Title II to assist with WIOA core partner collaboration at the local level as needed.

Veterans

Colorado will continue its strong tradition of promoting the training, hiring and retention of veterans, plus ensuring veterans priority of service in all USDOL funded programs. This will be accomplished through close working relationships with workforce system partners to make sure that veterans are represented to potential employers and business owners as qualified and professional employees who bring a unique set of skills to the workplace. The state workforce system delivers the full array of labor and employment services to Colorado veterans at all 77 of its State and County-run full-service Workforce Centers and satellite offices around the state. Disabled Veteran Outreach Program (DVOP) Specialists at the centers provide veterans with employment services such as job matching and referral to posted job openings, vocational and career guidance, labor market information, plus workshops on resume preparation and conducting effective job searches. Staff also refer eligible and qualified veterans to appropriate WIOA funded training programs and discretionary initiatives, as well as registered apprenticeship programs throughout the state.

In addition to State and County workforce center employees, who provide career services to all veterans, CDLE currently employs 27 full-time Disabled Veteran Outreach Program (DVOP) Specialists and 9 full-time Local Veteran Employment Specialists (LVER) assigned to workforce areas around the state. These positions are funded through a USDOL Veterans Employment and Training Service (VETS) grant and fulfill all responsibilities mandated by the grant programs, including the provision of case management services to veterans with Significant Barriers to Employment (SBE's). The Jobs for Veterans State Grants Plan is included under Section VII. Veterans grant staff also serves other populations of veterans in the State through MOUs.

Those populations include:

- National Guard and Reserve members returning from Operation Iraqi Freedom (OIF) and Operation Enduring Freedom (OEF) - only if the individual meets eligibility criteria per most recent guidance (VPL 03-14, and 03-19). In particular, Virtual Job Fair Technology is being utilized to assist this group with veterans resource sites, accessed while they are still overseas, and actual virtual job fairs when they return to this country.

- Service-connected disabled veterans, who are targeted and identified through various Veterans Service Organizations (VSO) as well as outreach activities at Veteran Centers, Veterans Administration Medical Centers, and Community Based Outpatient Clinics (CBOCs.)

- Members of the Armed services who are wounded, ill and injured and receiving treatment in Military Treatment Facilities (MTF) or Warrior Transition Units (WTU) through relationships established with the Wounded Warrior Program located at Fort Carson.

- Incarcerated veterans, who are identified and contacted through "in-reach" activities conducted within correctional facilities managed by the Colorado Department of Corrections. DVOPs will also work in partnership with the Veteran Offender initiatives described in detail below under Ex-Offenders.

- Homeless Veterans - Veteran Employment Specialists work with the Homeless Veteran Reintegration Program (HVRP) to provide one-on-one employment assistance and supportive services to homeless veterans including, but not limited to, resume and interviewing preparation, employment workshops, job search assistance and job

referrals. The supportive services provided include, but are not limited to, rent assistance, food, and transportation funding.

Older Individuals

Senior Community Service Employment Program: Most of the SCSEP participants have been out of school for over 40 years and have limited work history or a history of unskilled labor. Those who have been out of the workforce for some time may not be aware of what is acceptable and unacceptable in the workplace; so workplace etiquette and customer service training is provided to give the participant the tools to ensure successful participation. Additionally, employer preferences have been trending toward computer/technology competencies as among the most-in-demand job skills. This preference is also observed consistently among SCSEP staff across project locations. Participants who have computer/technology skills, or are willing to develop these skills, are able to obtain unsubsidized employment faster and often with a higher wage. Many host agency supervisors commented that the participants need to have already obtained some basic computer skills prior to starting the Community Service Assignment (CSA) at the host agency. The host agency satisfaction surveys identify similar sentiments. Project staff have also found that participants with basic computer skills are more confident in their abilities and are more valuable to employers.

Through the additional training and supportive services provisions, the State of Colorado will be able to ensure a more widespread adoption of computer/technology training efforts. Training and supportive services will ensure barriers to employment have been mitigated to the greatest extent possible and develop participants who are more confident, computer literate, and have greater access to opportunities. Participants will be more marketable due to their newfound confidence in handling modern technologies. Greater confidence with technology will aid participants beyond employment as they become masters of simple yet oftentimes intimidating technologies that create barriers in their life, such as point-of-sale (POS) machines, ATMs, and tablet-based forms increasingly used in healthcare and medical facilities.

Colorado SCSEP will take advantage of the unique resources available through the Colorado Department of Labor and Employment, and its statewide network of Workforce Centers (WFC), by utilizing WFC staff to assist in creating training and employment opportunities for participants of SCSEP. CDLE and the statewide network of workforce centers continue to work with and support the efforts oftheSenior Community Service Employment Program (SCSEP) under the Colorado Department of Human Services: Aging and Adult Services, through participation on the Older Worker Task Force, which promotes connections between the SCSEP service providers, their participants and the workforce centers. In addition, workforce centers have older worker specialists, who provide workshops and employment services that are customized for this targeted group, and have developed MOUs with the Title V Older Worker service providers. Colorado will continue to place SCSEP participants at WFC locations and collaborate with other WFC partners such as Veteran Services and the Division of Vocational Rehabilitation to maximize participant referrals and optimize participant training. To assist SCSEP participants in the development of their on-line and computer literacy skills, the WFCs e-Colorado has a multitude of on-line options pertaining to career exploration, education and employment. Since SCSEP participants are required to enroll with a WFC, they will attend WFC classes that enhance/upgrade their skills. The WFCs play a pivotal role in training the participants and improving their opportunities for employment. Moving forward with WIOA a system wide State training plan will be implemented to assure job seekers receive the best possible information regarding programs that may benefit them to achieve gainful employment.

The complete SCSEP plan is included under section VII and further describes the initiatives for serving this population.

Migrant and Seasonal Farmworkers

The Wagner-Peyser Agricultural Outreach Plan (see the complete plan under Section VI) sets policies, and objectives with regard to providing services to the agricultural community, specifically Migrant and Seasonal Farm Workers (MSFWs). The Colorado Department of Labor & Employment (CDLE) provides these services through the statewide network of workforce centers to ensure that MSFWs receive the full range of employment, training, and educational services on a basis which is qualitatively equivalent and quantitatively proportionate to the services provided to non-MSFWs.

During the next five program years, the six significant workforce centers will continue to provide quality employment services and referrals to appropriate agencies as part of their assistance to the MSFW population. The contracts with each workforce area will contain provisions to ensure that MSFWs receive the full range of employment and training services offered to the general public. CDLE will continue to provide technical assistance to the local areas in their planning activities to help ensure that the needs of MSFWs are addressed, and that the workforce development system is in full compliance with the Judge Ritchie court order and federal rules and regulations.

New Americans

With the appointment of a senior advisor, Colorado has an enhanced focus on integrating its New American community into its workforce. Colorado joins a growing number of states with dedicated focus on this community. The Colorado Department of Labor and Employment, alongside other cabinet departments and the Governor's office, will develop and implement specific strategies to help Colorado harness the skills of the New American community. Strategic alignment of efforts across state government will accelerate these efforts. This will require focused and collaborative work at the state and local levels that will include policy development, training and technical assistance, and authentic community engagement. Workforce Development Boards are encouraged to consider how to increase access and positive outcomes for refugees and immigrants, working alongside state-level efforts to integrate refugees and immigrants into our broader Colorado community.

During the next several years, the Colorado Department of Labor and Employment will deploy additional policy guidance, technical assistance, and community engagement efforts to structure a statewide approach to including services to the New American community in its workforce efforts. Local workforce centers will be encouraged to develop and implement strategies to ensure their services are accessible to immigrant and refugee communities, and CDLE will exercise its abilities, potentially through contracting, goal setting, monitoring and/or data reporting, to align efforts with statewide goals to ensure Colorado is a state that works for all Coloradans.

Ex-Offenders

Over the past several years, CDLE has designed, implemented and managed several highly successful ex-offender employment and training programs in collaboration with multiple state and local agencies. Among these were the "Stop the Revolving Door" and "Motherhood" initiatives, which provided employment and training services to 839 participants, and achieved

a 71% entered employment rate as well as a 9% recidivism rate during the first year of post-program follow-up.

- Workforce Development Programs/CDOC Strategic Partnership-Workforce Development Programs has a long-standing partnership with the Colorado Department of Corrections (CDOC). Among the initiatives that are being developed and implemented as a result of this partnership are the following:

- Road to Work Pilot Program - The Road to Work Program provides rapid turn-around employment and training services to increase livable wage employment placement and retention opportunities for Parolees under the supervision of CDOC. Through a collaborative agreement between the Colorado Department of Labor and Employment (CDLE) and CDOC, the Road to Work Program creates an employment team comprised of the designated CDLE Road to Work Program Coordinator, the Local Area Workforce Case Manager, the Community Parole Officer, the employer, and other identified partners to assist the Parolee in achieving successful re-entry into society.

- Re-entry Employment and Training Navigators - Through state legislation, CDOC has established four employment and training navigators that work with businesses to develop employment opportunities for parolees. Through the WDP/CDOC partnership, these staff have access to Connecting Colorado for tracking employer contacts and they will be integrated into the Business Services teams in the appropriate workforce centers to coordinate employer outreach.

- Connecting Colorado for Incarcerated Offenders - As a demonstration project, CDLE provided access to the statewide Connecting Colorado self-service job matching system inside one set of prisons during June 2012, allowing inmates to register for employment. In order to safeguard the workforce system's employers, inmate registrations will not be activated until release; however, they will have the ability to search for job possibilities and learn about the job requirements as part of their preparation for transition into the labor market. Upon release they can update and fully complete their registrations and have them activated by CDOC staff, who have been trained in Connecting Colorado administrative functions. Connecting Colorado will continue to be available statewide to all public and private prisons under the jurisdiction of CDOC.

The Veteran-specific curriculum to be created will be a complementary blend of programs developed by Veterans for Veterans, like the family reintegration curriculum developed by the U.S. Army for solders discharging from the military with the TAP (Transition Assistance Employment Program), and evidenced-based psycho-social programs developed by experts in the field. The 16-week specialized curriculum will also include a "Speaker's Series" designed to increase releasing Veterans' knowledge of essential life skills topics. Colorado's current Incarcerated Veterans Transition Program will be integrated into this initiative and will also be involved in providing mentoring services to participants. The staff and instructors for this program will be Veterans themselves - Veterans teaching Veterans.

Since employment is paramount to success, incarcerated Veterans will have the opportunity to expand their skills through vocational programs designed for this special population. The collaborating agencies are also working with the local workforce system to leverage funds for specialized on-the-job trainings, work experiences and internships to better prepare Veterans for employment, as well as help them utilize and transition the skills they learned in the military. CDOC is considering creating a Veteran-specific parole officer position to support

Veteran offenders upon release from prison. This position will provide a continuation of services, attitude and expectations for the Veteran offender.

Workforce Assessments for Jobseekers

In 2016, the Workforce System Assessment Team re-designed the Colorado Employment Skills Certificate (CESC) and updated the form into a fillable document. Piloted several years ago by seven local workforce areas, the Workplace Readiness Credential is now a component of the CESC and is available to all workforce areas for use with job seekers. The Workforce Readiness Credential (WRC), is a soft skills online assessment tool developed by the Conover Company that measures attitude, communication, planning and organizing, critical thinking, interpersonal/social skills, teamwork, professionalism and media rules.

The Workforce System Assessment Team undertook a survey of local workforce areas, WIOA partners, vocational rehabilitation and adult education (Colorado Department of Education) on what assessment tools they currently use to better inform CDLE, local workforce colleagues, and our partners as to what assessments tools are used and what they are used for. Based on the survey results, CDLE is creating a Colorado Assessment Guide to assist the Colorado Department of Labor and Employment and local workforce areas in the vetting, selection, use, and discontinuation of various career assessment tools.

D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

Statewide Business Services Alignment Initiative

In June 2011, business development services teams from workforce centers across the state began a dialogue that evolved into part of the workforce system's strategic effort to address gaps in serving businesses across all workforce programs. The vision of the Statewide Business Services Alignment Initiative is "to provide seamless access to business development for all employers and produce positive economic return for business/industry and our communities." The areas of focus have expanded and are addressed by workgroups comprised of Business Development Representatives and charged with the mission of standardizing business practices. The key topic areas addressed by workgroups under this initiative include:

- Work Based Learning
- Identifying, expanding, and leveraging community partnerships
- Marketing/outreach
- Communications and enhanced economic reporting
- Staff development
- Technology

These areas of focus are embedded in a plan of action, approved by the State's local workforce directors, to create an integrated system that responds rapidly to Colorado business needs through easy to use technology and services that result in ready access to a skilled and competitive workforce.

A priority for PY20 is to develop partnerships that enhance service to Colorado businesses while reducing redundancy and silos. The statewide Business Services Team expanded to engage additional staff from the required one-stop partner programs. DVR's internal Business Outreach Specialist Program is deeply engaged with the statewide business services team as

well as Job Navigators from the Department of Corrections Division of Adult Parole. New business Services staff from the Community Colleges will be integrated into the statewide business services initiative over the coming year. These partnerships will be leveraged to create one primary public point of contact for an employer while also connecting the business with a broad pipeline of workers across programs and agencies.

The coming year will also see increased alignment of business services with the statewide career services alignment initiative. The result will be a seamless connection between business and job seekers.

DVR has a long history of providing services to employers and since 2016 has developed strong collaboration with the Business Services Team, aligning strategies to maximize the benefits of a demand-driven system. DVR continues to provide Disability Awareness Training and technical assistance to businesses and to core and combined plan partners to meet the needs of Colorado employers and promote a diverse workforce. DVR utilizes the resources and tools that are available through the local business services programs and through local sector partnerships to train local DVR staff and will continue to do so as DVR teams refocus efforts to ensure the effective use of labor market information to support employment of individuals with disabilities in key sectors. Training will continue to reinforce the use of common terminology among one-stop partners, how to use labor market information to educate individuals with disabilities about opportunities, and the language and culture of business and the private sector. Finally, pre-employment transition services are provided to students with disabilities, including work experiences, to assure that youth and young adults are better-prepared for the services they will receive through other core and partner programs.

While five of the six core programs have experience working with businesses, serving employers is a new concept for adult education and family literacy. Therefore, AEI will provide guidance and support for programs so that they can incorporate employer feedback to ensure effective and efficient programming. Further, AEI will develop and provide technical assistance for adult education and family literacy providers funded through Title II on utilization of new or existing business and industry advisory committees to ensure that necessary workplace readiness skills are integrated into curriculum so that adult education and family literacy clients are prepared to transition to post-secondary education and training to increase wage-earning capability.

Finally, SCSEP has always been a demand-driven program that supports on-going communication and continual feedback with employers and workers. The State collaborates with the WFCs, community college system and local employers to maximize unsubsidized employment opportunities for SCSEP participants. SCSEP job developers work with regional chambers of commerce, labor unions, community colleges and local employers to identify employment positions available and training needs, and these efforts will also be integrated into the Statewide Business Services Team.

Statewide work on the integration of New Americans will also include ensuring that immigrants and refugees skills and experiences are relayed to the business community. While many New Americans have foreign-based experience, they have talents applicable to Colorado's business needs. Colorado will work to ensure this experience is readily understood by Colorado's employers.

Efficient services to businesses across all partners requires data integration, and system alignment efforts between the Colorado Benefits Management System (CBMS) and the State's labor exchange and workforce case management system, Connecting Colorado, have been under

way for nearly 2 years. This improved system integration will enable users of both systems to serve customers more fluidly across workforce and human service programs, thus reducing duplicate effort and data entry, and will support business service staff in both systems through the ability to better understand and match participants to employer need. Human service staff who specialize in business development will be invited to participate in the business services alignment group through the workforce system.

Moving forward, the Business Services Team, inclusive of one-stop partner staff, will be the primary vehicle for alignment of efforts and coordinated services to employers. CDLE will continue to hold annual Business Services Summits to provide a forum for business services staff to discuss ways to improve statewide branding, service delivery and performance outcomes, and develop new innovations and strategies.

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

For several years the CWDC has convened a Policy and Legislation Committee consisting of legislative liaisons and policy experts from multiple state agencies, including the Department of Higher Education and the Department of Education. This body meets regularly throughout the year to discuss legislative solutions to issues facing our education and training system as well as to coordinate efforts in the implementation of new legislation. In addition to this committee, an agency data sharing group has been convened for the past two years that specifically looks at opportunities to leverage information contained within one agency for the benefit of multiple programs and customer bases. This data sharing group played a critical role in the development of the first and second Talent Pipeline Report, which identifies workforce supply and demand to highlight critical gaps in our talent development system and recommends solutions. Recommendations from the latest report include: a) enhancing access to opportunities for quality, lifelong education aligned with the future of work; b) fostering an economy that works for everyone through recognizing work experience and skills with academic credit, reducing barriers to occupational licensure, and developing options for employers to support high cost services (e.g., housing and childcare); and c) focusing resources on scaling and enhancing strategies that have demonstrated results and effectiveness.

F. PARTNER ENGAGEMENT WITH OTHER EDUCATION AND TRAINING PROVIDERS

Through state law, the CWDC added an Education Liaison and a Workforce Liaison in 2016, who will work together to ensure that K-12, community colleges, CTE programs, community-based training providers, and four-year institutions are plugged into career pathways and understand how to use established pathways as a resource for students. The Workforce Liaison position is specifically established to work with all community-based training providers, including entities on the Eligible Training Provider List. Opportunities will be extended to these partners to engage in initiatives and activities to create alignment with the needs of industry as identified through sector partnerships.

G. LEVERAGING RESOURCES TO INCREASE EDUCATIONAL ACCESS

Strong collaboration and engagement across agencies is critical to achieving the aforementioned goals, and there is a shared commitment within state agencies, the Governor's office, and the state legislature to ensure collaboration works to achieve the best outcomes for Coloradans. Since 2013, multiple bills have passed the state legislature that focus on sector partnerships and career pathways and create new funding streams to support demand-driven workforce development activities.

- Colorado House Bill 13-1165, Development of a Manufacturing Career Pathway, required that the State Board for Community Colleges and Occupational Education (SBCCOE) collaborate with the Department of Higher Education (DHE), the Colorado Department of Education (CDE), and the Colorado Department of Labor and Employment (CDLE), to design a career pathway for students seeking employment in the manufacturing sector.

- Senate Bill 14-205 required that the Colorado Workforce Development Council (CWDC) within the CDLE work with the DHE, the CDE, and the Office of Economic Development and International Trade (OEDIT) to create a talent pipeline infrastructure for use in creating career pathways for students.

- Colorado House Bill 15-1274, Creation of Career Pathways for Students for Critical Occupations in Growing Industries, requires the CWDC, in collaboration and consultation with its partners (including state agencies, Superintendents of local school districts, local Workforce Centers, and industry partners), to design integrated career pathways for growth industries. The designed career pathways must focus on critical occupations in growth industries that do not currently have clearly articulated career pathways. The bill requires partnerships with industry (through regional sector partnerships) and trade associations to inform and drive the development of each pathway. Industry partners must also review each career pathway annually to ensure the pathway remains relevant to the industry and to provide input for ongoing adjustments to the pathway to meet workforce needs.

- Colorado House Bill 15-1230, Innovative Industries Workforce Development Program, directs the Colorado Workforce Development Council (CWDC) to enter into an agreement with one intermediary per innovative industry to work with the CWDC and its statewide partners on the following: Facilitate outreach to employers; Market the program; Inform the development of intern curriculum; Identify internship opportunities for individuals; and work with the CWDC and the Colorado Department of Labor and Employment's Employment and Training Division (CDLE E&T Division) to determine what businesses should be pre-approved if more businesses apply than funding is available. The Innovative Industries Internship (III) program was approved by state legislators in 2015 and implemented the same year to meet the critical needs of our local economy in finding qualified talent for innovative industry-related businesses. Many 21st century jobs in innovative industries require formal post-secondary training or education and students in Colorado's high school and college systems could benefit from exposure to career employment through internship opportunities that create career pathways. Internships are a recognized way to support our local talent pipeline while aligning with education, work-based training, and work-based learning. The III program incentivizes employers to find, hire, and train interns by providing up to $5,000 to help provide students with hands-on experience in one of the eight innovative industries: advanced manufacturing, aerospace, bioscience, construction, electronics, energy & natural resources, engineering, and information technology.

- Colorado HB 15-1170 Increasing Postsecondary and Workforce Readiness creates the position of Postsecondary and Workforce Readiness Statewide Coordinator (position shall be named the Education Liaison) to work under the CWDC in the Colorado Department of Labor and Employment (CDLE). The Education Liaison will work with secondary school districts, area vocational schools, Community Colleges, the CDE, the Department of Higher Education (DHE), and the career and technical education division

within the community college system to raise the level of PWR achieved by high school graduates.

- Colorado House Bill 19-1236, Workforce Diploma Pilot Program creates the workforce diploma pilot program in the department of education to award completion payments to qualified providers for the attainment of certain outcomes achieved by eligible students enrolled in the courses or programs, including earning high school diplomas, course credits, or industry-recognized training certificates.
- Colorado House Bill 19-1294 Transfer Apprenticeship Credit to College Credit, creates a working group that will determine the most efficient and appropriate manner in which to facilitate the transfer of earned construction industry registered apprenticeship program credit to college credit.
- Colorado Senate Bill 19-216 High School Innovative Learning Pilot, creates the high school innovative learning pilot program to support school districts, boards of cooperative services, and charter schools (local education providers) in providing innovative learning opportunities to students enrolled in grades 9 through 12 (high school students).

H. IMPROVING ACCESS TO POSTSECONDARY CREDENTIALS

Several initiatives are currently underway in Colorado that support the performance measure in WIOA for attaining postsecondary credentials. The initiatives work with employers, educational institutions, and training providers in unique ways to accomplish this goal.

Colorado's sector strategies include the implementation of skill panels that are designed to unpack what employers need when they often require a specific credential in a job posting. After the skills are uncovered, educational institutions can work with sector partnerships to adjust, customize, or design new industry-recognized credentials relevant for key industries in the state.

Through the investment of the ApprenticeshipUSA funds, Colorado has spurred industry and jobseeker interest in Registered Apprenticeship and integrated RA into the K12 and postsecondary educational systems. Employer and individual outreach via creation of a website (apprenticeshipevolution.com), PSA campaign, and subrecipient collateral materials shifted public perception of apprenticeships. In addition to the 19 programs established leading to USDOL certificates, ApprenticeshipUSA funds have also contributed to postsecondary-workforce integration. SAE funds supported the establishment of CareerWise Colorado, which offers apprentices a high school diploma, college credit and work experience. An investment into the curricular design of a healthcare registered apprenticeship at a community college earned recognition by industry through committing over $3million to RAPs as a training mechanism and by USDOL via an H1B grant of $12million. Many of these programs will be stackable, leading to further college and career opportunities.

In order to raise awareness of the value and availability of training programs that lead to industry-recognized credentials, the WORK Act was passed in 2015. Since January 1, 2016, the program accepts applications for matching grants from public and private providers of qualified skilled worker training programs. Qualified grant recipients offer training for skills that are needed in the workplace, with a credential or other evidence of achievement awarded at the completion of training.

Applications received by the CDLE are transmitted to a 13-member grant review committee composed of representatives of certain government agencies, including CDLE, the Office of Economic Development and International Trade (OEDIT), the Department of Higher Ed (DHE), the Colorado Workforce Development Council (CWDC) in CDLE, as well as representatives from employers and industry. The bill sets forth guidelines for the review of applications by the committee, and the committee is directed to establish formal criteria and rank applications. The committee's recommendations and rankings are submitted to the executive directors of CDLE, DHE, and OEDIT. These directors then jointly determine grant recipients and amounts.

A growth opportunity has also been identified for concurrent enrollment programs, and Colorado HB 15-1275, Measures to Support Concurrent Enrollment in Career and Technical Education Programs, clarifies that a local education provider (secondary school) may include course work related to apprenticeships and internships in the programs that are available for concurrent enrollment with post-secondary Career and Technical Education programs. It also directs the Concurrent Enrollment Advisory Board to assist education providers with creating cooperative agreements with providers of internships and apprenticeships.

Finally, the Business and Experiential Learning Commission was launched in 2015 to assist in the development and scaling of work-based learning programs that directly tie high schools to a wide variety of employers. This group is exploring the feasibility of replicating the Swiss Apprenticeship Model in Colorado, and a team has traveled to Zurich to learn about the model. The first pilot is being launched in partnership with Denver Public Schools and it will engage students as early as ninth grade with career exploration activities, and by a student's senior year they will be spending multiple days per week on a job site.

I. COORDINATING WITH ECONOMIC DEVELOPMENT STRATEGIES

The CWDC works closely with the Colorado Office of Economic Development and International Trade (OEDIT), Minority Business Office (MBO), as well as with the Economic Development Council of Colorado (EDCC). The executive director of OEDIT is a voting member of the CWDC and is a member of the executive committee as well to ensure the alignment of efforts and strategies. Coordinating strategies with the MBO will help ensure entrepreneurs who are veterans, women, or minorities are able to connect with the services offered by the organization. Additionally, the CWDC works with the Governor's Workforce and Education Cabinet work-group which includes the cabinet members from economic development, workforce development and higher education, and ensures alignment of shared goals across the agencies and the state. The EDCC is a professional organization dedicated to strengthening Colorado's economy, and the majority of its members are local economic developers. As a member of EDCC and its policy committee the CWDC is in tune with objectives and tactics being implemented and has a forum to bring workforce issues to this body on an ongoing basis.

B. STATE OPERATING SYSTEMS AND POLICIES

the following subsections:

A. Core Program Activities to Implement the State's Strategy

B. Alignment with Activities outside the Plan

C. Coordination, Alignment and Provision of Services to Individuals

D. Coordination, Alignment and Provision of Services to Employers

E. Partner Engagement with Educational Institutions

F. Partner Engagement with Other Education and Training Providers

G. Leveraging Resources to Increase Educational Access

H. Improving Access to Postsecondary Credentials

I. Coordinating with Economic Development Strategies

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

Colorado is excited have received a Workforce Data Quality Initiative grant to help develop a workforce longitudinal data system that includes inputs from core programs and other partners. Current systems in use by core programs are distinct across the four titles. Integration does currently exist and shared use in place through data sharing agreements. Yet the future alignment of these systems will be greatly enhanced and connected through the developing Colorado Data Trust and work under the grant. A summary of existing systems is as follows.

Connecting Colorado/Case Management Solution: The state relies on a custom vendor-created solution to provide access to both the labor exchange system and the case management system that serves employers, job seekers, and workforce center staff. This system, Connecting Colorado, employs robust API interfaces that exchange data securely and regularly with all core partner programs. Consistent updates to data sharing agreements between the Colorado Department of Labor and Employment, Employment and Training Division, and its partners ensure clearly defined roles and measures with regard to partner data imports, workforce data exports, and its overall use. The Employment and Training Division serves as PACIA under the new State Wage Interchange System and receives and processes wage data on a quarterly basis.

Connecting Colorado Data/Reporting System: This is the case management, data collection, and reporting system that Colorado developed for statewide use in all of the Workforce Centers. The system provides the ability for Workforce Centers and their partners to track all WIOA Title I-B, TAA, Veteran, Wagner-Peyser, state and local programs (approximately 100), plus discretionary grants in one common database. All reports generated from this system are "up to the minute," thus allowing better management of day-to-day activity and performance. Along with the federally-mandated reports, Colorado has developed a variety of locally requested reports that allow staff to track their caseloads, correct data entry errors, and analyze performance at the state, local, and case manager level. In addition, the system is agile enough to allow the as-needed addition of reports, and program and service codes that will track new statewide initiatives supporting the state's workforce strategies. Core programs under Title II and Title IV, as well as other workforce partners may make use of this system through data sharing agreements with the state or the local workforce areas.

Connecting Colorado Self-Service: Connecting Colorado allows job seekers and employers to self-enter their work registration, resume, or job order data directly into the statewide database via the Internet, as well as search for jobs or qualified applicants. Colorado uses a skill based job matching system that focuses on experience, skills, and education level in addition to O*Net job titles, as well as allowing the upload of applicant resumes. All job listings are automatically searched after entry based on the employer's requirements and in compliance with veterans priority of service. Job seekers can search for new jobs at any time or receive an email notification once a job is entered that matches their specifications. Likewise employers may run applicant searches on demand or rely on the automated searches. Connecting Colorado also provides access to a Tool Box of job search assistance links that has been customized for each workforce region. Links include direct access to the local area's web page, career exploration,

training resources, and self-marketing tools, Unemployment Insurance information, and additional job banks. Colorado has developed a mobile application that will allow customers to access these resources on smartphones and other portable devices.

State Financial Reporting System: This system was developed to track all Federal and state funds disseminated to the statewide system of local workforce areas, who are sub-recipients of the state. Such funds include the allocations for WIOA Title I-B, Wagner-Peyser, and TAA, JVSG, national, and state discretionary grants. It provides on-line access to state financial and program staff, as well as sub-recipient staff, to report expenditures and run real-time on-demand reports for budget monitoring purposes. Data from this system feeds the federal 9130 fiscal reporting formats that are required by USDOL. The software also embodies the payment system for the Trade Readjustment Assistance (TRA) program and generates reports covering TRA payment data. This system will be modified to incorporate all WIOA changes and requirements over the four-year life of this combined plan.

Virtual Job Fair (VJF): Developed in-house by CDLE staff, the Virtual Job Fair has become a critical tool to serve businesses and job seekers alike. To date more than 200,000 job seekers and 50,000 businesses have participated in VJFs statewide.

- The purpose is to reduce costs of job fairs and other services, and increase access to workforce services for job seekers and businesses statewide, especially in the rural areas of the state.
- Local workforce areas, other service providers and businesses can partner to target a job fair to a particular business sector or population of job seekers.
- This system has been used to provide resources and job information to National Guard troops before their return from Afghanistan.
- Features include:
    - Job listings, on-line workshops and career exploration resources
    - On-line presentations by employers and access to their websites
    - On-line real-time job interviews
    - Run more than one job fair simultaneously
    - Automatic upload of data to Connecting Colorado to track services and outcomes
    - Site usage reports

CDLE Knowledge Management Portal - eColorado: The CDLE Knowledge Management Portal, eColorado, is designed to manage virtual resources through a single, comprehensive, electronic interface developed for workforce stakeholders and partners including business customers, workforce professionals, government, and others. The portal provides documents, team rooms, calendars, and more. eColorado provides improved services and tools which include the Virtual Job Fair platform. In addition, it houses GoToMeeting/GoToWebinar for on-line meeting capability utilized by CDLE and Colorado's workforce centers to conduct webinars. eColorado was successfully migrated from Northern Illinois University to the Colorado Department of Labor & Employment/OIT servers on August 30, 2013. eColorado is on a new content management system: Adobe Experience Manager (AEM) Sites, which will enhance the user experience and provide options for additional new features. The redesign project will be completed in 2020. (https://e-colorado.coworkforce.com)

LMI Gateway: Colorado's LMI Gateway is a powerful labor market information system designed to meet the needs of workforce professionals, job seekers, and businesses, as well as economists, economic development organizations, and the media. This platform is freely available to all core programs and other workforce partners. Training is provided regularly on the use of the site by LMI staff to core program staff through a variety of channels. The consistent use of the LMI Gateway allows all programs to make decisions based on the same data set and shared understanding of economic realitites in local communities.

Examples of LMI Gateway features include:

- A wide variety of regional labor market services, such as labor trends, statistics, economic, demographic, salary, and employer data
- Tools to chart and analyze labor market data
- Career exploration and job postings information
- A personal home page that allows a registered user to save items that fit their needs
- Access a wide variety of resources designed to help a business succeed
- Education and Training Resources: Find a suitable training or education program, as well as information on training providers and schools. This is also known as the Eligible Training Provider List for the Workforce Innovation and Opportunity Act programs.

Adult Education MIS: Title II adult education utilizes the commercially available data system, LiteracyPro's LACES, as the electronic management information system (MIS). LACES is used by all AEFLA grantees. LACES has individual student records (including attendance, assessment and demographic data) within a relational database structure. LACES incorporates required National Reporting System measures using the common definitions and categories. Colorado has made customizations to LACES to allow for additional alerts and widgets that make monthly data desktop monitoring easier for both grantees and state staff.

Considering the strict state laws around student Personally Identifiable Information, other WIOA partners do not have access to the state adult education data system. State agency staff rely on data matching, outlined in data sharing agreements, to provide the required information for federal reporting.

All Colorado local workforce areas are required to use the state-developed common database (Connecting Colorado) to track all USDOL or CDLE funded programs provided through workforce centers including Wagner-Peyser, WIOA, TAA, and Veterans Employment and Training Services, as well as discretionary grants and locally funded programs. All labor exchange services delivered by the local areas are performed using this system, resulting in a true statewide labor exchange system. Data reporting to USDOL also derives directly from the statewide system, allowing real time reporting and tracking of results at the statewide, regional, local, and individual client level.

State policies and procedures related to data integrity and data validation are reflected in the structure of the Connecting Colorado system and are currently based on the standards set in TEGL 10-16, change 1: Performance Accountability Guidance. Colorado has also issued an updated, comprehensive set of data collection policies and processes that cover the entire

participation cycle including enrollments, exits, participation services, and data entry standards. This document is titled Program Guidance Letter (PGL) MIS-2017-01: Guidance on Data Integrity and the Customer Participation Cycle for WIOA and TAA Programs and is available for review at: https://www.colorado.gov/pacific/cdle/pgl

This policy reflects the reporting requirements of WIOA as provided by USDOL. In addition, Colorado has issued fully WIOA compliant procedures for eligibility and has updated Connecting Colorado accordingly. The WIOA Eligibility PGL 15-09-WIOA is also available at the link provided above.

The Connecting Colorado system serves as the data collection and reporting system for WIOA Title I, WIOA Title III, TAA, and JVSG programs, all of which are housed within the Colorado one-stops. It also serves as the data collection and reporting system for a variety of other programs and activities such as USDOL discretionary grants, MSFW, state funded grants, and locally funded programs. It does not serve as the data collection system for Title II or IV.

Vocational Rehabilitation is co-located in a limited number of workforce centers across Colorado. All VR offices utilize an electronic case management system that complies with federal and state reporting requirements. All DVR Counselors receive training on data collection requirements and various controls are in place to support accurate and consistent data collection. DVR collaborates with other core programs and required partners to ensure appropriate agreements and procedures are in place to facilitate data sharing when necessary to meet federal reporting requirements.

Adult Education may be co-located within a workforce center in Colorado. Due to strict state Personally Identifiable Information laws, adult education utilizes its own data collection and reporting system, LiteracyPro's LACES. State agency staff rely on data matching, outlined in data sharing agreements, to provide the required information for federal reporting.

ll job seekers can access Connecting Colorado's labor exchange self-service system and enter their own registration data for WIOA Title III data collection and reporting. The same is true for all businesses; they also can self-list job orders that go into data collection and reporting

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

The CWDC and CDLE's Workforce Development Programs review, update, and create policy guidance on an ongoing basis as needed to support the strong implementation of activities throughout the state. Policies have been created to update local board membership and responsibilities, regional and local planning, one-stop certification, priority of service, and program eligibility. Specific guidance is being developed for all one-stop partners to clarify the requirements for access in the system so that one-stop operators and all partners have a mutual understanding of what is required. We expect to institute a training system that provides sufficient cross-training to all system staff so that the system can function effectively and meet the needs of customers across physical locations and entry points.

CDLE encourages local workforce areas to co-enroll participants into other programs that are appropriate for the individual participant's needs. Co-enrollment can offer the opportunity to access additional program services and funds to help address a participant's specific barriers to employment and/or education. When co-enrollments occur, case managers must include a case

note of justification in the participant file explaining why the co-enrollment is appropriate. Participants must meet the eligibility requirements of each program and will become part of each program's performance outcomes. In addition to state policies, any local co-enrollment policies must also be followed. Going forward, CDLE will be working with the core and required One-Stop partners to update relevant policies and to develop a process for cross-agency policy development to address the new opportunities for integration as a result of WIOA. Details of the most current CDLE policies are listed below and the full text of each policy is available at https://www.colorado.gov/cdle/pgl.

The policies that support implementation of State Strategies are as follows;

- WIOA-2015-01: Local Area Designation and Appeals Process: To provide guidance and process for the designation and re-designation of Workforce Development Areas in Colorado, along with the process for appealing designation decisions.
- WIOA-2015-02, Change 1: One-Stop Certification Criteria: To provide guidance, process and deadlines for the certification of one-stop centers and the one-stop delivery system that is to be conducted by local workforce development boards, and to set criteria for the development of a local policy for one-stop certification.
- WIOA-2015-04: Local Workforce Development Board Policies: To provide comprehensive guidance and policy direction to Local Workforce Development Boards (LWDBs) and Local Workforce Areas on the requirements for establishment of WIOA compliant boards by no later than October 1, 2015.
- WIOA-2015-05: WIOA Eligibility for Title I Programs: To provide comprehensive guidelines for local workforce areas regarding the determination of eligibility for WIOA programs, and to provide information on the use of appropriate documentation or self-attestation to support eligibility determinations.
- WIOA-2015-06: WIOA Eligibility Training Providers for Title I Programs: This Policy Guidance Letter (PGL) provides new information, criteria, and procedures for Local Workforce Development Boards and local workforce areas to implement the Eligible Training Provider requirements in the transition from the Workforce Investment Act of 1998 to the Workforce Innovation and Opportunity Act of 2014.
- WIOA-2015-07: Priority of Service for Title I Adult Programs To provide policy guidance to Local Workforce Development Boards for the implementation of priority of service for WIOA Title I Adult program customers.
- WIOA-2015-09: Individual Training Accounts for Title I Programs: To provide guidance to Local Workforce Development Boards and Local Areas in the development of a local policy on Individual Training Accounts under WIOA guidelines
- WIOA-2016-02: WIOA One-Stop Partner Requirements and Access to Services: To provide guidance to Local Workforce Development Boards and Local Areas on: 1) The roles and responsibilities of required one-stop partners in the one-stop delivery system; 2) Establishing "comprehensive" workforce centers; 3) The requirements for access to the programs and activities provided by required One-Stop partners through the system; and 4) The elements that must be addressed in the memorandum of understanding with One-Stop partners.
- WIOA-2016-03: State Infrastructure Funding Formula: To provide comprehensive guidance and policy direction to Local Workforce Development Boards (local boards),

Local Workforce Areas (local areas), and all WIOA required one-stop system partners on the establishment of a state back-up formula for infrastructure funding; and To establish a January 1, 2018, deadline for inclusion of infrastructure funding in local partner MOUs.

- MIS-2017-01: Guidance on Data Integrity and the Customer Participation Cycle for WIOA Title I, Wagner-Peyser, and TAA Programs: To provide uniform guidance for Local Areas that ensures compliance with the participation, enrollment, exit, and follow-up requirements of WIOA. To provide procedural guidance for the documentation and data entry of program enrollments, services, and exits that will ensure accurate and reliable data for compliance with USDOL reporting and data validation requirements.To provide for the first time a WIOA services cross-walk that identifies all reportable services and whether they are participation or non-participation services. To provide an overview of the WIOA Participation cycle for training staff in a Powerpoint; and to inform Local Areas of the requirement to write (or update) and submit local policies and procedures to implement this PGL.
- WIOA-2017-01: Transfers of Funds Between the Adult and Dislocated Worker Programs: Provide guidance regarding the transferring of funds between the Adult program and the Dislocated Worker program local formula allocations; and Outline the criteria and factors that would lead the Colorado Workforce Development Council, on behalf of the Governor, to approve or disapprove a request to transfer funds between the Adult and Dislocated Worker programs
- WIOA-2017-02: Incumbent Worker Training: To establish state policy regarding the use of local formula funds for Incumbent Worker Training (IWT) for WIOA Title I Adult and Dislocated Worker Programs
- WIOA-2017-03: Program Evaluation: To provide 1) initial guidance regarding the use of evaluations as a foundational practice within the workforce system; 2) To explain the purpose and use of evaluation techniques; 3) To encourage the identification and development of Promising Practices.
- WIOA-2017-04: Rapid Response Policy Guidance: To provide information and guidelines for Rapid Response activities conducted by the State Rapid Response Team (SRRT) and the local areas. The intent of this PGL is to establish a basic standard of service across the State of Colorado. Local areas may improve or enhance this standard as indicated by local needs and resources.
- WIOA-2017-05: Registered Apprenticeship: To provide guidance to Local Workforce Development Boards and Local Areas on the new provisions for Registered Apprenticeship in WIOA
- WIOA-2017-07: Local Negotiations on Infrastructure Funding: To provide comprehensive guidance and policy direction to Local Workforce Development Boards (local boards), Local Workforce Areas (local areas), and all WIOA required one-stop system partners on the local negotiations process for infrastructure funding contributions.
- WIOA-2017-08: Approval of Local Boards as One-Stop Operators: To provide specific guidance and policy direction to Local Workforce Development Boards (LWDB) and local area directors on the approval process necessary for local boards to be the one-stop operator for the local area.

- WIOA-2017-09: One-Stop Operator: To provide information and technical assistance to local workforce development boards and local areas on the selection of a one-stop operator as required in the Workforce Innovation and Opportunity Act (WIOA) of 2014.
- WIOA-2017-11: WIOA Title I Supportive Services: To provide comprehensive guidance that ensures compliance with the WIOA requirements for the provision of supportive services to Adult, Dislocated Worker, and Youth participants
- WIOA-2017-12: WIOA Title I Youth Incentive Payments: To provide comprehensive guidance that ensures compliance with the WIOA requirements for the provision of incentive payments to WIOA Title I Youth participants
- WIOA-2017-13: WIOA Title I Needs Related Payments: To provide comprehensive guidance that ensures compliance with the WIOA requirements for the provision of needs-related payments to WIOA Title I Adult, Dislocated Worker, and Youth participants
- More recent PGLs:
    - WIOA- 2018-01: Local Workforce Development Board Certification
    - WIOA-2018-02: WIOA Title I Work Experiences
    - WIOA-2018-04: Measurable Skill Gains Performance Measure
    - WIOA-2018-05: WIOA Title I Customized Training
    - WIOA-2019-02: Credential Attainment Performance Measure

3. STATE PROGRAM AND STATE BOARD OVERVIEW

A. STATE AGENCY ORGANIZATION

Colorado's workforce programs are state administered and operated locally, allowing the needed customization to meet the unique needs of businesses and job seekers throughout Colorado. Therefore, each of the core programs and required one-stop partners function differently at both the state and local level. The Colorado Department of Labor and Employment (CDLE), Colorado Department of Education (CDE), and Colorado Department of Human Services (CDHS) each have administrative responsibility for one or more programs contained in this plan. Below is a list of each of the programs included in this Combined Plan and the state agency that has administrative responsibility for each program.

	State Agency Program Responsibility
Agency	**Program**
CDLE	- Adult (Title I) - Dislocated Worker (Title I) - Youth (Title I) - Wagner-Peyser (Wagner-Peyser Act, as amended by Title III) - Vocational Rehabilitation (Title I Rehabilitation, as amended by Title IV) Trade Adjustment Assistance for Worker Program (Chapter 2, Title II Tract Act) - Jobs for Veterans State Grants (Title 38, Chapter 41) - Migrant and Seasonal Farmworker Program (Title I)
CDE	- Adult Education and Family Literacy (WIOA Title II)
CDHS	- Senior Community Service Employment Program (Title V Older Americans Act) Temporary Assistance for Needy Families (TANF) Program (42 U.S.C.)

Narrative Organizational Charts of State Agencies

CDLE is led by the Executive Director, Joseph Barela, and Deputy Executive Directors Cher Haavind and Darcy Kennedy. There are eight divisions reporting to them including Employment and Training, Vocational Rehabilitation, Unemployment Insurance, and Labor Standards and Statistics. Additionally, as the Colorado Workforce Development Council is housed at CDLE for administrative purposes they also report to the Executive Director of CDLE.

William Dowling directs the Division of Employment and Training (E&T). The E&T Division includes the management information systems group and a large department named Workforce Development Programs led by Elise Lowe-Vaughn. Workforce Development Programs has administrative responsibility for Title I-B Programs, Wagner-Peyser, TAA, JVSG, and the Agricultural Outreach activities within the Wagner-Peyser program. Title I-B and Wagner-Peyser funds are distributed to the ten local workforce development areas in Colorado. JVSG is a state-run, federally funded program, and state employees are based at workforce centers throughout Colorado to deliver services.

Kristin Corash directs the Division of Vocational Rehabilitation. Administrative staff are based in the CDLE main office in Denver and field staff are housed in locations throughout the state of Colorado.

Labor Standards and Statistics includes the Labor Market Information group and is headed by Scott Moss. Jeff Fitzgerald leads the Unemployment Insurance team.

Lee Wheeler-Berliner is the managing director of the Colorado Workforce Development Council (CWDC). The CWDC brings together businesses and public partners to set strategy for talent development efforts statewide. Through business-led collaboration and the creation of innovative resources CWDC reimagines how Coloradans connect to work and businesses connect to workers, leading to economic prosperity for all Coloradans.

The Colorado Department of Education has administrative responsibility for Title II funds and conducts a competitive process to award grants to providers. The commissioner of education is Dr. Katy Anthes and she is hired by a publicly-elected state board of education. One of the divisions reporting to the commissioner is Innovation and Pathways, led by executive director Misti Ruthven. Underneath Ms. Ruthven is the Office of Adult Education, led by Danielle Ongart. Ms. Ongart is the state AEFLA director and administers Title II programs and funds.

Colorado Works is administered through CDHS and is also county-run. Therefore the county department of human or social services is responsible for delivering services in each of Colorado's 64 counties. Many counties choose to contract portions of Colorado Works to the local workforce center or another provider. CDHS is led by executive director Michelle Barnes and has two departments that manage programs within this Combined Plan. The Office of Economic Security oversees the Colorado Works (TANF) Program and that program is directly managed by the Employment and Benefits Director, Danielle Dunaway. The Office of Community Access and Independence has an Aging and Adult Services unit that administers the SCSEP program.

B. STATE BOARD

The Colorado Workforce Development Council serves as the State Board for Colorado and, through executive order, was updated to be fully compliant with the requirements of WIOA in 2019. A list of board members with affiliations can be viewed on the CWDC's website, www.colorado.gov/cwdc. All new board members are provided with an orientation on the background, purposes, and activities of the council. Staff are responsible for developing work

plans to ensure that all required activities are being met. The committee structure described previously supports both staff and board members in completing tasks and effectively carrying out all required functions.

I. MEMBERSHIP ROSTER

Governor Jared Polis

BUSINESS MEMBERS

Ashley Valdez, Xcel Energy

Bryan Dear, The Payroll Department, Inc

Danielle Kirkpatrick, DoubleTree Hotel

Denise Burgess, Burgess Services

Frances Matthews, CTA

Heather Terenzio, Techtonic Group

John Knapp, Agriculture

Joshua Cody, Colorado Farm Brewery

Karla Nugent, Weifield Group

Kevin Cory, Noble Casing, Inc

Kevin Wilkins, San Luis Valley Development Group

Kevin Yoshida, Creativity Lab Colorado

Kirstie McPherson, Edevco

Lawrence Wagner, Spark Mindset

Lisanne McNew, Treasurer, McNew & Associates, Inc

Michael Hess, Blind Institute of Technology

Michael Trotter, Front Range Roofing Systems, LLC

Nilesh Parikh, Bank of America Merrill Lynch

Noel Ginsburg, Intertech Plastics, Inc.

Paul Zeckser, HomeAdvisor

Seth Harvey, BlueStaq

Steven Fechheimer, New Belgium Brewing

Tara Hosick, Climax Molybdenum Company

Tim Fry, Chair, Mountain Racing Products

WORKFORCE REPRESENTATIVES

Francis Vigil, Colorado Springs Electrical JATC

Joel Buchanan, Steelworkers Organization for Active Retirees

Kelly Causey, Ph.D., Colorado Children's Campaign

Lisa Taylor, Immigrant and Refugee Center of Northern Colorado

Liddy Romero, Secretary, WorkLife Partnership

Daniel Kraus, Pueblo Electrical Joint Apprenticeship & Training Trust

Phillip Nash, Boomers Leading Change

Michael Stelling, Northglenn High School

Jason Wardrip, Colorado Building & Construction Trades Council

GOVERNMENT REPRESENTATIVES

Angie Paccione, Ph.D., Department of Higher Education

Betsy Markey, Office of Economic Development & International Trade

Commissioner Nancy Jackson, Arapahoe County District 4, Local Elected Official

Commissioner Richard Elsner, Park County District 2, Local Elected Official

Joe Barela, Colorado Department of Labor & Employment, Representing WIOA Titles I and III

Katy Anthes, Ph.D., Colorado Department of Education, Representing WIOA Title II

Kristin Corash, Director, Division of Vocational Rehabilitation, Representing WIOA Title IV

Michelle Barnes, Colorado Department of Human Services

Representative Dominique Jackson, Colorado House of Representatives

Senator Angela Williams, Colorado State Senate

Senator Jack Tate, Colorado State Senate

EX-OFFICIO (non-voting)

Rick Garcia, Department of Local Affairs

Kelly Ann Folks, Arapahoe/Douglas Works!, Representing Rocky Mountain Workforce Development Assn.

Dean Williams, Colorado Department of Corrections

Joseph Garcia, Education and Training Committee Chair, Colorado Community College System

Teina McConnell, Pickens Technical College, representing Area Technical Colleges

Ryan Irsik, Walmart, Special Advisor

Annual recruitment cycles for new members typically occur in the summer with new appointments made in August or September for terms that start October 1st. This roster is accurate and complete as of October 12, 2020.

II. BOARD ACTIVITIES

The CWDC conducts meetings with all appointed Council members three times per year. These meetings are typically held over the course of two days on a Thursday and Friday, with an average of 14-18 hours of scheduled activities. At each meeting there is a Council Business agenda item where policies are examined and approved, officers are elected, and other required state board functions are carried out. The in-person meetings take place in different parts of the state so that members can develop a better understanding of economic drivers and workforce activities in various locations. About three weeks prior to each Council meeting there is a pre-work survey assembled and distributed which goes into detail on all of the planned agenda items. This format allows CWDC members to conduct research, begin thinking about solutions to issues, and read updates from other entities prior to coming into the meeting room. This level of preparation then allows members to engage in discussion, ask informed questions, and bring items to a vote when needed. The pre-work assignments are counted as attendance at a meeting, and completion of the pre-work is critical to allow for strategic, generative meetings that are valuable for all participants and allow decisions to be made.

Additionally, all new CWDC members are provided with an orientation on the background, purposes, and activities of the council within the first six months of their appointment. The orientation explains the four standing committees (executive, sectors, education and training, and advocacy) and encourages new CWDC members to get involved in committee work so that they are able to perform required functions with a smaller subset of CWDC members. The committee structure supports both staff and board members in completing tasks and effectively carrying out all required functions. When necessary actions must take place that do not align well with scheduled full Council meetings, authority is formally delegated to the executive committee.

During Council meetings, Mentimeter is used to count votes and create opportunities for input on a variety of topics. When policies must be passed, the draft policy is distributed through the pre-work and during the live meeting clarifications are provided and decisions are made.

The CWDC Office staff includes a board liaison who manages all correspondence and scheduling with members. Each standing committee also has a dedicated staff person who works with chairs to set agenda's, weigh in, and identify streams of work that the staff or other departments need to support to ensure that Colorado'workforce activity goes smoothly.

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

A. ASSESSMENT OF CORE PROGRAMS

Adult, Dislocated Worker, Youth, and Wagner-Peyser

In accordance with Colorado’s philosophy of local control, each local area designs and conducts its own evaluation. Additionally, the Colorado Department of Labor and Employment (CDLE) evaluates each local area’s outcomes by utilizing the performance accountability measures described in 116(b) of WIOA by updating its Connecting Colorado on-line reporting system. CDLE provides tools to each local area that enable them to track their performance on these measures as the year progresses and to track the impact on performance of each of their

participants. In addition to local performance evaluation, CDLE uses a variety of assessment tools to evaluate and track program effectiveness and to promote a culture of continuous improvement, including:

Connecting Colorado Data/Reporting System: Connecting Colorado enables local workforce areas and their partners to track WIOA Title I-B, TAA, Veteran, Wagner-Peyser, state and local programs, and discretionary grants in a single database. Reports generated from this system are "up to the minute," which allows better management of daily activities and performance. In addition to federally-mandated reports, CDLE has developed a variety of locally requested reports that allow staff to track caseloads, correct data entry errors, and analyze performance at the state, local and desk level. The reports measure levels of service and outcomes by program or targeted groups, provide the ability to measure the impact of outreach programs and specialized initiatives on performance, and can be easily adapted to add new reports and coding to accommodate new programs and initiatives. Core programs and required partners may access and use the system through data sharing agreements with the state or the local workforce areas. In PY 14, Connecting Colorado added new modules to track and report on employer-focused activities. These modules link employer services with system-generated surveys to obtain information on customer satisfaction, effectiveness and service outcomes. The new reporting capability was recognized in a White House Paper, "Ready to Work: Job-Driven Training and American Opportunity," as a best practice.

Program Monitoring: CDLE's comprehensive monitoring guide, recognized as a model by the US Department of Labor (USDOL), is the result of an ongoing monitoring and technical assistance process that has built a strong working relationship between the state and local workforce areas. Quarterly, the State Monitoring team from CDLE meets with the local areas to review client service levels, program expenditure rates, and performance outcome results. Through these reviews, staff identifies areas that may require additional technical assistance and training to identify risk areas and rectify any deficiencies prior to the start of the annual state compliance monitoring. CDLE implemented a new tiered risk assessment policy (PY16) specifically for discretionary grants that will determine the criteria for compliance issues and draw on promising practices in grants management to prevent performance issues.

Return on Investment (ROI): The CWDC, CDLE Labor Market Information and Workforce Development Programs sections, and the local workforce areas have used economic impact evaluations for several years to determine the economic benefits and fiscal contribution of individuals who receive services through the workforce system, obtain employment, and are working six months later. Colorado will explore strategies to enhance the model to improve its effectiveness, expand it to include partner programs, and explore other ROI measurements such as the cost and benefits derived from reduced reliance on various forms of public assistance (e.g. Unemployment insurance, Colorado Works).

Continuous Improvement Management System (CIMS): The CWDC has worked in partnership with the local boards and USDOL to develop a performance incentive system for workforce areas that meets the needs of the local area and ensures a high level of quality and continuous improvement across the state. The Continuous Improvement Management System (CIMS) is aligned with the Colorado Blueprint and CWDC strategic initiatives, and rewards local areas for pursuing:

- A dual customer approach that emphasizes a focus on business needs

- Strategies/partnerships to utilize industry sectors as the platform for increasing the number and level of training and educational opportunities, as well as for increasing the number of credentials achieved
- Partnership initiatives with economic development, chambers of commerce, and small business organizations
- Participation in the Key Industry Taskforce with the Governor's Office of Economic Development and International Trade
- Participation in the Statewide Business Services Alignment Initiative

CWDC and CDLE's Workforce Development Programs develop the local planning guidelines for workforce areas and review the local plans submitted each year. The alignment of all strategic planning efforts combined with implementation of continuous improvement efforts helps maintain an effective and efficient statewide workforce system that embodies innovation and excellent customer service.

Evidence Based Practice and Program Evaluation: CDLE is developing new policies and procedures to facilitate ongoing evaluation and research on current and new programs, including state initiatives, and to identify best practices that have the potential to become evidence based practice. This includes the development and use of logic models to establish benchmarks and outcome measures. CDLE will scale pilots that show promise to a statewide basis, or replicate the pilot through partner agencies who serve similar participants; similar evaluation methods will be used to determine whether the program warrants consideration as an Evidence Based Practice. To support this work, Colorado is working with national experts at Results For America to implement an evidence continuum that defines the distinctions in concepts and practices that are: data informed, data driven, promising practice, proven practice, and evidence based practice. In addition to national expertise, the CWDC will work to coordinate efforts with the Colorado Evidence-Based Policy Collaborative. Evaluation will also help identify and address areas such as gaps in services, program inefficiencies, duplication of effort, etc.

<u>Evidence Based Practice Academy</u>

To promote and accelerate the state evaluation process and activities, CDLE/Workforce Development Programs has contracted with Northern Illinois University to achieve the following outcomes:

"Northern Illinois University's Center for Governmental Studies (CGS) is proposing to work with the Colorado Department of Labor and Employment (CDLE) to design an Evidence-Based Practice (EBP) Academy for local and state-level workforce practitioners. Over a seven-week period, CGS will confer with a broad cross-section of Colorado workforce professionals and stakeholders regarding the feasibility, benefits, and challenges of creating an EBP Academy or other focused training opportunity. At the conclusion of this project, CDLE will be provided with a recommended structure, learning objectives, curriculum and suggested implementation plan for a Colorado EBP Academy based on information collected from prospective Academy participants and other Colorado workforce system stakeholders." Contract work was completed during PY19 and the recommendation plan was implemented through a contract with the University of Denver.

<u>USDOL Evaluation Peer Learning Cohort</u>

On November 1, 2019, Colorado submitted its application to become part of the The Evaluation Peer Learning Cohort (EvalPLC) which is an interactive technical assistance forum and comprised of cross-agency representatives from four to six states. State teams who represent core WIOA programs will collaborate and develop evaluation action plans designed to conduct and implement state and/or local research and evaluations.

Participants will:

- Learn from experienced evaluators, state and national subject matter experts (SMEs), and each other as they develop an evaluation plan.
- Use the Evaluation Toolkit: Key Elements for State Workforce Agencies and two evaluation assessment tools to build evaluation capacity, the
    - Evaluation Readiness Assessment - designed to help assess the degree to which your state is ready to implement research evaluation activities and projects; and
    - Evaluation Design Assessment - developed to support states in designing a plan for evaluation.
- The EvalPLC will also exchange ideas to support the creation of other evaluation tools and resources to enhance evaluation capacity for the workforce system."

Should Colorado be selected for this opportunity, we will integrate the tools and expertise gained with the implementation plan developed by Northern Illinois University.

Data Coordination and Information Sharing: CWDC, CDLE and program partners will develop ways to share information across programs that take into account the federal and state rules that govern data collection and sharing and the release of information for each program. Colorado will then develop and implement the most effective and efficient solution for data coordination and information sharing, and use the resulting data to facilitate core program evaluations.

Adult Education and Family Literacy

As the entity responsible for management and oversight of Title II funds, the Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will develop and implement grantee monitoring and oversight consistent with the goals of the Colorado State Plan to emphasize quality, effectiveness, and program improvement. The monitoring and oversight of adult education and family literacy programs in Colorado will help to ensure that programs will continue to demonstrate their effectiveness. This will include review of performance against the federally negotiated performance targets and program implementation and success metrics outline in teh grant request for proposal and subsequent continuation applications.

Adult education and family literacy providers funded through Title II will be required to file comprehensive annual performance reports detailing both quantitative and qualitative results. Annual statistical reports from the information management system will track numbers of adult learners, demographic data such as sex and race/ethnicity, level of education, educational functioning level, and most importantly, progress at the local provider level.

AEI will provide technical assistance both on a universal level and customized for individual programmatic needs, as deemed necessary based on quarterly reviews.

Vocational Rehabilitation

DVR remains in a baseline period for all performance measures outlined in WIOA section 116 and anticipates beginning to negotiate targets for PY20. However, DVR reviews current performance on a quarterly basis, analyzing performance on common performance measures, in addition to other relevant data points such as employment outcomes, wages at closure, timeliness of eligible and plan development, etc, The performance reports can be run on a statewide, regional, or local basis to provide a robust picture of performance throughout the state. To help inform the overall quality of the services being delivered, a customer satisfaction surveys are available and results are reviewed quarterly to guide work moving forward. Finally, a Comprehensive Statewide Needs Assessment is conducted every three years, which includes a survey of staff members, clients, and stakeholders to provide ongoing information and data points about service delivery.

B. ASSESSMENT OF ONE-STOP PARTNER PROGRAMS

At a minimum, workforce delivery system partner program services, and the partner programs included in this Combined State Plan, will be assessed using performance measures they have in common, in addition to other performance accountability measures required by each program's funding source(s) and grants. Performance will be reviewed at both the state and the local workforce area level.

SCSEP

SCSEP has operational reporting requirements set by the US Department of Labor (DOL). The SPARQ (SCSEP Performance and Results Quarterly Progress Report) system is used for data collection and data reporting. The SPARQ system includes the Web Data Collection System (WDCS), which is an application that allows users to enter, store and manage SCSEP participant data.

The data is stored directly into the USDOL SCSEP National Database via the Web. This Web-based system provides access to participants' information. The data entered into SPARQ is used to monitor enrollments, placements, follow-ups, data quality and other key data. SPARQ performs the calculation of the SCSEP performance measures and generates the Quarterly Progress Report (QPR) and Data Quality Report (DQR). The USDOL analyzes data performance to determine if SCSEP is meeting annual performance goals each program year (July 1st through June 30th).

Colorado Works

Through the Federal TANF program, the State is held accountable to the Federal Work Participation Rate (FWPR). This rate is calculated by the Federal Administration of Children and Families within US Health and Human Services, and states are expected to meet or exceed performance targets set on an annual basis. The performance rate is established through the analysis of CBMS data for countable participants, and their ability to meet the federally required hours of participation in countable activities. This information is reviewed and managed by county and State human service staff, and may also be a performance indicator for workforce development sub-contractors who have a formal agreement for service provision through the local human service department in their area.

Colorado has further promoted employment entry as a meaningful outcome for program participants, and implemented system changes to enable the tracking of employment. A target rate for employment entry has been established in the Colorado Department of Human Services' 5-Year Strategic Plan, and is expected to be 40% or better for the current performance year. The rate is calculated through the attainment of certain outcomes identified in CBMS. This goal is

tracked monthly through the Department's performance management system, known as C-Stat. County human service departments and their workforce development partners or sub-contractors are held accountable to this rate.

TAA

With the passage of the Trade Adjustment Assistance Reauthorization Act of 2015, the TAA program will report performance under the WIOA measures used by core and partner programs. The TAA program currently reports all performance measures via the USDOL mandated quarterly PIRL.

In addition to the PIRL report, USDOL has implemented the TAA Data Integrity (TAA DI) report card that compares the financial and performance measures reported on the PIRL and the ETA 9130. If a state has any discrepancies between the two reports or any objectives that are not met, then the state must respond in writing on why the objective was not met and how it will be improved or fixed. The TAADI report card has provided areas of opportunity for improvement with the TAA program and will guide continued efforts in the future. All case files at the local workforce center are monitored on an annual basis by CDLE's Workforce Development Programs Regional Services Team. The TAA program utilizes the monitoring reviews to discover trends within the program and provide additional training to the regional case managers. In addition to annual monitoring, TAA files are verified by USDOL's annual Data Integrity review.

Jobs for Veterans State Grant

The demonstration of Priority of Service is the responsibility of American Job Center (AJC) staff. It is also the responsibility of the State and County leadership to ensure that Priority of Service is being successfully demonstrated by providing training, technical assistance and monitoring accomplished by the Local Veteran Employment Representative (LVER), CDLE Monitors, State Veterans Program Coordinator, CDLE Regional Directors, and Veteran Program Managers. Methods and means used to verify whether or not Priority of Service is being provided include the following but are not limited to:

- Vets 9002 and 200 Report
- Interviewing of AJC staff
- State monitoring tool
- Review of program files and documentation
- Customer surveys
- Site visits
- Accompanying DVET during federal audits
- Quarterly Managers Report

CDLE and USDOL/VETS monitor and review the provision of services to veterans at the state and local levels tri-annually or as directed, and provide the Executive Director, local directors, and the local workforce center manager with the findings, recommendations and/or corrective actions. LVERs will conduct Priority of Service overview and training annually or as needed for additional training in their local area. A Priority of Service PowerPoint is available to the AJC regions as a training tool. This Power Point, in the absence of a LVER, can be used for training

purposes of AJC new hires. As a condition of receiving any USDOL funds for programs, local areas will provide Priority of Service to veterans and covered persons. This annual agreement is a contract between the State of Colorado and the local areas. The contract must be signed by both the state and local areas as a condition to receive all US Department of Labor funds.

MSFW

The MSFW programs, as required by US Department of Labor (DOL) regulations, work closely with partner agencies to provide information and referrals to our shared customer base. Each significant office hands out MSFW packets to migrants during outreach activities. These informational packets include resources for English as a Second Language (ESL), Migrant Education Program (MEP) and training opportunities available through the WIOA 167 provider. The agency Memorandums of Understanding (MOUs) have provided a way to track some of our referrals between agencies. MOUs have been in place with three of our close partners. The Connecting Colorado (CC) database is used in part to collect data from referrals that have been made by Workforce agencies and outreach workers. The data entered in CC is used for monitoring purposes to ensure qualitative and quantitative proportionate referrals provided to the MSFW population

The overall program performance measures include: Entered Employment; Employment Retention; Average Earnings; Community Service referrals; and referrals to educational services and organizations. These performance measures are reviewed quarterly and targets are adjusted based on the economic conditions of Colorado. MOU referrals are also reviewed on a quarterly basis and discussed in meetings with our partners for reporting and evaluation purposes.

Additionally, CDLE will work with partner programs to develop additional forms of evaluation for joint initiatives, such as the CDLE-CDOC Road to Work pilot project targeting high-risk parolees. In addition to looking at the percentage of participants who obtain and maintain employment, and their average wage at placement, the pilot will also identify and evaluate which service strategies are the most effective at helping participants meet their goals at each stage of the process (e.g. assessment, training, credentialing, parole, etc.)

C. PREVIOUS ASSESSMENT RESULTS

Colorado has a commitment to continuous improvement within the talent development network and a focus on the use of data to inform practices and program design. Performance measures and indicators of effectiveness are regularly reviewed at the state and local level and assessment results are utilized to both develop statewide policy that embraces effective work and in the short- and long-term planning of local areas. On an annual basis, the CWDC leads the development with state partners of the Colorado Talent Pipeline Report. This report publishes overall statistics about the system and highlights the practices that have demonstrated results. Policy reommendations are made to the state legislature about opportunities for scaling effective strategies or for reducing barriers that have been identified.

Since the 2018 State Plan modification the biggest adaptation of strategy has been the expansion of work-based learning. This move came from the examination of evidence-based pratices in other states and countries and the approach has been further modified based on early results from activities under federal grants. The implementation practices now in use are based on what has been most successful so far in acheiving program outcomes.

At the local level, opportunities for planning across programs are provided regularly through conferences and the talentFOUND Quarterly Conversations implemented in 2019. Through

these events the results of programming and special initiatives in one local area are shared with others across the state, and time is dedicated for staff and board members to create action plans with partners that will incorporated the results into their local work. Each core program engages in specific actions as well to assess effectiveness amd adapt their strategies. Those results are discussed below, and the adaptations for 2020 will be incorporated into the local and regional planning processes that are currently underway in Colorado as of May 2020.

Cost Effectiveness: Colorado has a continuing policy of examining the outcomes and cost effectiveness of all of our programs in order to guide us in this effort. In this analysis we consider both benefits for our clients and cost savings/increased revenue for government entities. In many cases, there will be a reduction in governmental costs due to elimination or reduction of dependence on TANF, Food Stamps, Unemployment Insurance benefits, and other forms of public assistance.

Latest Data - PY18:

Adult Program

- Expenditures - $9,404,552
- Cost per client served - $3,028 (served 3,106)

Youth Program

- Expenditures - $6,897,070
- Cost per client served - $2,622 (served 2,630)

Dislocated Worker Program

- Expenditures - $4,797,651
- Cost per client served - $3,860 (served 1,243)

Workforce Intelligence Data Expert Workgroup (WIDE)

During the implementation of WIOA in 2015, local workforce directors designated their local staff to participate in a state-wide data expert group to ensure consistency of workforce related data. As a result of the partnership, which is a collaboration of Colorado's Workforce Center System and the Colorado Workforce Development Council, the WIDE group has created systematic changes in how all federally funded workforce programs utilize data as a decision-making tool for program evaluation and design. During PY18, WIDE worked closely with Directors, State MIS and other stakeholders to create a data system that provides actual wage data for WIOA Title I and Title III workforce programs to evaluate the effectiveness of programming through earnings outcomes for any program year back to 2010. In this report, the WIDE group is able to evaluate outcomes utilizing actual median earnings data for any exit cohort based on the following data points:

- 2 Quarters Prior to Program Registration
- Entry Quarter Registration
- 2 Quarters Post Exit
- 4 Quarters Post Exit
- Year 2 Post Exit

- Year 3 Post Exit
- Year 4 Post Exit

Based on the methodology, the following measures were found for the Colorado Workforce System after WIOA implementation:

- Colorado Statewide Cost per Participant for individuals receiving career services through any Title I or III programs.
- Colorado Statewide Cost per Participants for individuals receiving training services through any Title I or III programs.
- In addition, WIDE has compiled the Return on Investment (ROI) for all programs in previous two bullet points that are outlined in the charts below. The aggregate Return on Investment for all Colorado workforce programs since the implementation of WIOA is $9,623,806,894. This includes program exiters from WIOA Title I and Wagner-Peyser.

Program: Wagner-Peyser

Year	Number of Participants	Allocation	Expense	Cost Per Participant	Total ROI
PY14	280,988	$10,257,662	N/A	N/A	N/A
PY15	258,045	$10,201,840	$7,428,262	$28.79	$ 776,338,170
PY16	228,164	$10,358,334	$7,001,327	$30.69	$ 887,164,693
PY17	203,882	$10,049,862	$6,651,025	$32.62	$ 915,017,351

PY18 data available April 2020.

Program: WIOA Adult

Year	Number of Participants	Allocation	Expense	Cost Per Participant	Total ROI
PY14	4,406	$9,803,977	$13,732,304	$3,116.73	N/A
PY15	4,152	$9,328,713	$14,537,998	$3,501.44	$ 34,889,622
PY16	3,801	$8,814,684	$7,069,618	$1,859.94	$ 31,637,846
PY17	3,180	$7,893,417	$7,268,095	$2,285.56	$ 23,315,345

PY18 data available April 2020.

Program: WIOA Dislocated Worker

Year	Number of Participants	Allocation	Expense	Cost Per Participant	Total ROI
PY14	2,096	$12,658,118	$6,322,090	$3,016.26	N/A
PY15	2,375	$10,897,869	$9,238,973	$3,890.09	$ 24,890,243
PY16	2,065	$9,858,705	$7,315,295	$3,542.52	$ 28,639,129
PY17	1,439	$8,828,318	$7,500,999	$5,212.65	$ 13,509,673

PY18 data available April 2020.

Program: WIOA Youth

Year	Number of Participants	Allocation	Expense	Cost Per Participant	Total ROI
PY14	3,123	$10,552,245	$11,106,180	$3,556.25	N/A
PY15	3,404	$10,059,776	$11,025,605	$3,239.01	$ 702,779
PY16	3,086	$9,505,469	$7,928,173	$2,569.08	$ 5,633,107
PY17	2,602	$8,511,996	$7,639,064	$2,935.84	$ 3,348,200

PY18 data available April 2020.

The WIDE group had several other accomplishments during PY18:

1. Completed several reports at the request of various stakeholders:
    a. Report on labor force availability to inform discussion of Colorado's early childhood education and childcare systemic goals.
    b. Report on the economic impact of current aggregate student debt in Colorado estimating foregone demand for local goods and services caused by outflow of money for student loan remittance from the state's economy.
    c. Report on the four generations currently in the labor force.
    d. Sundry regional reports designed for local workforce area stakeholders.
2. Completed a review of official statewide designations of key industry clusters using the North American Industry Classification System (NAICS) and created profile templates for each of the key industry clusters as defined in Colorado.
3. Arranged training for all EMSI users in the state's workforce development system and provided training to its own members on the new methodology in performing program evaluation using actual earnings data as shown above.
4. Is presently working with the Colorado Workforce Development Council to contribute to the Colorado Talent Pipeline Report, which is a legislated requirement for stakeholders in the state's workforce development ecosystem.

Program: Adult Education and Family Literacy

Title II adult education conducts an internal quarterly review of overall program effectiveness. Colorado Department of Education Office of Adult Education Initiatives (AEI) staff review individual grantee as well as statewide progress toward federal performance targets. AEI staff also informally look at the costs per participant, but since those costs vary so widely based on local context and grantee organization type, AEI does not publish those amounts. Professional learning for both grantee and AEI staff is based off of these quarterly reviews to provide just-in-time support.

Annually AEI utilizes the Data Quality Checklist in the National Reporting System to measure the effectiveness of both grantee and state agency staff data practices. As a result of this review, AEI worked with the MIS vendor, LiteracyPro, to develop a data dashboard within the LACES data system that provided more visibility into assessments, learner demographic data and enrollment data. AEI staff also attend the annual summer National Reporting System training, which provides an opportunity for Colorado to compare itself to other states and share best practices. These trainings focus on continuous improvement, and AEI staff have developed logic models and strategic plans to address targeted performance concerns.

Program: Vocational Rehabilitation

Every three years, the Colorado Division of Vocational Rehabilitation (DVR) and the State Rehabilitation Council (SRC), jointly develop and conduct a comprehensive statewide assessment of the rehabilitation needs of individuals with disabilities in Colorado. The triennial Comprehensive State Needs Assessment (CSNA) was developed and conducted in the fall of 2018. The results of DVR's CSNA are described in the Vocational Rehabilitation Services Portion of the Combined State Plan. DVR also takes a comprehensive approach to using data to drive the management of the VR program. DVR has increased its capacity to identify, gather, and analyze critical data to improve services and outcomes for clients, while ensuring the accountability and credibility of VR to all stakeholders. DVR intends to continue this approach of metrics driven leadership to further enhance performance management, quality assurance, and outcomes. This information is used to help shape DVR's goals, priorities, and strategies to improve vocational rehabilitation services in Colorado.

D. EVALUATION

Evidence Based Practice Academy

To promote and accelerate the state evaluation process and activities, CDLE/Workforce Development Programs has contracted with Northern Illinois University to achieve the following outcomes:

"Northern Illinois University's Center for Governmental Studies (CGS) is proposing to work with the Colorado Department of Labor and Employment (CDLE) to design an Evidence-Based Practice (EBP) Academy for local and state-level workforce practitioners. Over a seven-week period, CGS will confer with a broad cross-section of Colorado workforce professionals and stakeholders regarding the feasibility, benefits, and challenges of creating an EBP Academy or other focused training opportunity. At the conclusion of this project, CDLE will be provided with a recommended structure, learning objectives, curriculum and suggested implementation plan for a Colorado EBP Academy based on information collected from prospective Academy participants and other Colorado workforce system stakeholders."

Contract work will be completed during PY19 and the recommendation plan will be implemented through a contract with the University of Denver beginning PY20.

USDOL Evaluation Peer Learning Cohort

On November 1, 2019, Colorado submitted its application to become part of the The Evaluation Peer Learning Cohort (EvalPLC) which is an interactive technical assistance forum and comprised of cross-agency representatives from four to six states. State teams who represent core WIOA programs will collaborate and develop evaluation action plans designed to conduct and implement state and/or local research and evaluations.

Participants will:

- Learn from experienced evaluators, state and national subject matter experts (SMEs), and each other as they develop an evaluation plan.
- Use the Evaluation Toolkit: Key Elements for State Workforce Agencies and two evaluation assessment tools to build evaluation capacity, the
    - Evaluation Readiness Assessment - designed to help assess the degree to which your state is ready to implement research evaluation activities and projects; and

    - Evaluation Design Assessment - developed to support states in designing a plan for evaluation.

- The EvalPLC will also exchange ideas to support the creation of other evaluation tools and resources to enhance evaluation capacity for the workforce system."

Should Colorado be selected for this opportunity, we will integrate the tools and expertise gained with the implementation plan developed by Northern Illinois University.

CDLE/WDP will also:

1. Review existing program evaluation tools and processes
2. Work with its partner agencies to determine whether additional resources are required, and develop additional methods to evaluate existing data
3. Develop policies and guidance on how to identify and evaluate potential promising practices, and use evaluation as part of process improvement
4. Require the use of logic models and outcome measures as part of the development of new projects and proposals
5. Share information regarding promising practices identified through these activities with the appropriate state or federal entity for further evaluation to determine whether it might be an evidence-based practice
6. Work with the CWDC, local workforce development boards and state partner agencies to develop and use quasi-research methods to evaluate the effectiveness of core programs and new initiatives, to the extent practicable and within the constraints of existing resources.

CDLE/WDP will continue to utilize existing methods for program evaluation, such as annual compliance monitoring and data validation, routine tracking of state and local performance and expenditures, and look for ways to incorporate additional outcome measures. CDLE/WDP will work with its state partners to develop training in evaluation techniques for staff and foster a culture of informed inquiry. CDLE/WDP will also work with the local workforce areas to build capacity, and encourage the development and use of additional outcome measures and program evaluation as part of the selection and oversight processes for contracted workforce center operations.

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)

Youth funds are formula allocated to local areas based on the criteria outlined in federal law in WIOA sections 128(b)(2)(A)(i) and 128(b)(2)(A)(ii). The formula is based on three components, with each component having a weight of ⅓, as follows:

1. The relative number of unemployed individuals in Areas of Substantial Unemployment (ASUs) in each local area, compared to the total number of unemployed individuals in ASUs in all local areas in the state.
2. The relative excess number of unemployed individuals in each local area, compared to the total excess number of unemployed individuals in all local areas in the state

3. The relative number of disadvantaged youth (age 16 to 21, excluding college students not in the workforce and military), in each local area, compared to the total number of disadvantaged youth in all local areas in the state.

Colorado then utilizes a minimum percentage (or stop loss) to ensure that no local area receives an allocation percentage that is less than 90 percent of the average allocation percentage received by the local area for the previous two years. In addition, a process has been established and is captured in state law whereby local elected officials can request to review and propose a revision to the formula on an annual basis. If a review is requested, the suggested revised formula is forwarded to the CWDC for review and submission to the governor.

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

Adult funds are formula allocated to local areas based on the criteria outlined in federal law in WIOA section 133(b)(2)(A)(i) and (ii). The formula is based on three components, with each component having a weight of ⅓, as follows:

1. The relative number of unemployed individuals in ASUs in each local area, compared to the total number of unemployed individuals in ASUs in all local areas in the state.
2. The relative excess number of unemployed individuals in each local area, compared to the total excess number of unemployed individuals in all local areas in the state.
3. The relative number of disadvantaged adults (age 22 to 72, excluding college students not in the workforce and military) in each local area, compared to the total number of disadvantaged adults in all local areas in the state.

Colorado then utilizes a minimum percentage (or stop loss) to ensure that no local area receives an allocation percentage that is less than 90 percent of the average allocation percentage of the local area for the previous two years. In addition, a process has been established and is captured in state law whereby local elected officials can request to review and propose a revision to the formula on an annual basis. If a review is requested, the suggested revised formula is forwarded to the CWDC for review and submission to the governor.

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

Dislocated worker funds are formula allocated to local areas based on a formula developed in partnership by the state workforce agency, the Colorado Workforce Development Council, local elected officials, and local workforce areas, and approved by USDOL. The determining factors and their weights are: 1) Share of insured unemployment (20%), Share of number served (20%); Share of percentage of expenditures (15%); Share of declining industry (10%); Share of farm/ranch in crisis (5%); Share of unemployment insurance claims open longer than 15 weeks (25%); and Share of federal fiscal year unemployment (5%). Then a minimum provision is applied so that no local area receives less than 90% of the average allocation percentage of the local area for the 2 preceding fiscal years per WIOA 133(b)(2)(B)(iii).

Colorado is using a zero factor for Plant Closing and Mass layoff per the following justification: "A description of how the Governor's formula is appropriate to distribute funds equitably throughout the state." The Governor's formula, approved by USDOL has two added factors: the percent share of dislocated workers served in the previous fiscal year by each local area, and the percent share of dislocated worker formula funding spent in the previous fiscal year on dislocated workers by each local area. This formula has provided an equitable method of

distribution based on the need demonstrated by a local area's use of funds and continuing provision of services to dislocated workers. It has also served as an incentive for local areas to retain at least 50% of their DW funding for services to this population (rather than transferring more of the funds to the Adult program) during a 6-year period of record low unemployment.

In addition, a process has been established and is captured in state law whereby local elected officials can request to review and propose a revision to the formula on an annual basis. If a review is requested, the suggested revised formula is forwarded to the CWDC for review and submission to the governor, before submission to USDOL for approval.

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 Colorado Department of Education (CDE) is the State's eligible agency for adult education and family literacy programs. CDE is responsible for administering funds and providing program and performance oversight to sub-grantees.

During the 2019-20 program year, CDE will revise the Adult Education and Family Literacy Act (AEFLA) competition materials and processes with technical assistance and approval from the U.S. Department of Education's Office of Career, Technical and Adult Education. The WIOA competitive grant process for local adult education and family literacy providers will include a request for models associated with customer-centered services, including adult basic and secondary education and English language acquisition within career pathways and family literacy to promote stronger educational advancement of children, helping break cycles of poverty and build stronger local areas within Colorado. This process will include rating responses to the thirteen (13) considerations outlined in WIOA Section 231(e). Federal regulations governing AEFLA at 34 CFR §463.24 clarify that only an organization that has demonstrated effectiveness in providing adult education and literacy services is eligible to apply for AEFLA funds. Therefore, each application will be screened by CDE AEI staff to determine if it is from an eligible provider of demonstrated effectiveness and that demonstrated effectiveness is part of the eligibility determination. Only applications that are deemed eligible will be moved on for scoring consideration.

Funds will be available for a four-year grant cycle (July 1, 2020 - June 30, 2024) for the development, implementation, and delivery of adult education programs that support strengthening of local areas. After successful development, implementation and delivery of services during year one of the four-year grant cycle, a provider may apply on an annual basis (for the remaining years two, three and four) for continuation of financial support through Title II funding. All providers will be subject to the same funding cycles.

AEI will seek the best possible combination of agencies, organizations, and institutions to implement the goals and objectives within the Colorado State Plan and allowed through WIOA. Local programs may be approved for four-year funding, contingent on funding availability and CDE approval.

Each application will be evaluated by a review team solely on the criteria identified in the Request for Applications. Once all of the applications have been evaluated, the review team will submit their recommendations to CDE. Final funding decisions will be made by CDE.

The CDE Office of Competitive Grants will oversee the Request for Proposal and competition process.

Explanations for how Colorado awards to eligible providers is detailed in the following AEFLA program sections:

- Section 225 (Corrections Education) is in III.b.VI."Program-Specific Requirements for Adult Education and Family Literacy Act Programs".c.
- Section 231 (Grants and contracts for eligible providers) is in III.b.VI."Program-Specific Requirements for Adult Education and Family Literacy Act Programs".b.
- Section 243 (Integrated English Literacy and Civics Education) is in III.b.VI."Program-Specific Requirements for Adult Education and Family Literacy Act Programs".d.

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 Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will ensure direct and equitable access to grants and contracts and will use the same grant or contract process for all eligible providers in the state. All applicants follow a detailed request for applications (RFA), and each application is evaluated by a team of trained reviewers and AEI staff.

In order to provide adult education and family literacy services, AEI will work with core partners and Combined State Plan partners to communicate any funding opportunities. The announcement will also be placed on the CDE web site.

The entire RFA and related documents will be posted on the CDE website in a format that allows local providers to download and print them.

Description of Steps to Ensure Direct and Equitable Access:

1. AEI will accept applications from all eligible providers.
2. In order to assure equitable access, all applicants will receive identical requests for applications, have the same amount of time to prepare and submit said applications, and be evaluated using the same criteria and process.
3. Eligible providers will submit applications directly to the CDE Office of Competitive Grants, and funded providers will receive payments directly from the CDE as approved.

Some eligible providers may choose to be subcontractors, in which case the subcontractor's proposal must be incorporated into the eligible provider's proposal. Subcontractors are subject to the same process described in detail above, as well as instituting and maintaining procedures to meet all accountability, intensity, duration, and continuous improvement factors for providing services to adult learners.

C. VOCATIONAL REHABILITATION PROGRAM

Colorado has only one designated state unit for VR services that encompasses all populations and activities.

6. PROGRAM DATA

A. DATA ALIGNMENT AND INTEGRATION

Colorado recognizes the opportunities that exist to streamline and enhance services and reporting procedures through data sharing. Activities are taking place at multiple points along a spectrum that runs from complete isolation in data systems to full integration across partners. To support these efforts, all partners are supportive of education and training on specific systems and are willing to advocate for policy changes as needed to establish data sharing agreements.

A project has begun to share data between the Connecting Colorado system and the Colorado Benefits Management System (CBMS) used to track the Colorado Works and SNAP programs. This allows Colorado Department of Human Services customers to receive credit for services received in the Colorado Department of Labor and Employment, Connecting Colorado system. The services are sent to the Human Services system, Colorado Benefits Management System (CBMS). This prevents any need for double data entry between these systems. Data sharing capabilities will continue to be expanded over the four-year life of this combined plan. The Colorado Department of Labor and Employment is working on data sharing for reporting with other WIOA partner agencies.

The Eligible Training Provider List (ETPL) is administered through a partnership between the Colorado Department of Labor & Employment (CDLE) and the Colorado Department of Higher Education (CDHE). Training providers can apply for their listing and upload performance information through a secure online system at ColoradoETPL.org. Colorado's Eligible Training Provider List companion website for consumers can be found at COTrainingProviders.org. The ETPL consumer site not only highlights training providers whose performance qualifies them to receive WIOA funds to train adults and dislocated workers, it also lists approved training and education providers at the regional and statewide levels, all on an interactive, searchable website system.

Colorado Unemployment Insurance Wage data is shared with the Colorado Department of Higher Education that allows CDHE to calculate the performance metrics directly for schools using data they currently report regularly to CDHE. In addition, this will allow CDHE to assist the Adult Education and Family Literacy program with WIOA-required reporting. This will also solve the issue of confidentiality under FERPA rules because CDHE will receive the student data from all the training providers and run the wage data matches on their system.

The Division of Vocational Rehabilitation moved from CDHS to CDLE on July 1st, 2016. This move has facilitated linkages between their reporting systems and Connecting Colorado both for better service to customers and to more easily meet WIOA reporting requirements.

The state has a comprehensive system of on-demand reports, utilizing data from its statewide Connecting Colorado database, that allows state and local staff to view outcome data at the state, regional, local, and case manager level for Wagner-Peyser, WIOA Title I-B, TAA, and Veterans Employment and Training Services. These reports provide mechanisms to measure levels of service and outcomes by program or targeted groups such as individuals with disabilities, veterans, etc., providing a better measure of the impact of outreach programs or specialized initiatives on performance. All reports are available to run anytime by any staff person, and all data, with the exception of wage data contained in the report, is up to the minute (wage data is updated quarterly). In addition, all performance reports have a breakout of how individual clients fit into each performance measure, whether positive, neutral or negative. This allows staff to better find errors and improves analysis by revealing the source of the data down

to the individual level. Supplemental data that hasn't yet been obtained is tracked on a report that allows the case manager to obtain a list of clients that should be contacted during any given quarter.

Colorado provides ongoing technical assistance and training to its local workforce areas to ensure their understanding of performance measures and the impact of program strategies on performance outcomes. Monthly meetings are held between state and local staff to ensure good communication on performance and other related issues. These meetings also serve as the point of discussion on enhancements to Connecting Colorado that will further support performance accountability. The programs use the same set of services whenever possible so a service should only need to be entered once for a customer who is enrolled in multiple programs. This also helps in establishing integrated service plans for customers served by more than one program. The WIOA required partners at the state and local levels have engaged in initial discussions regarding ways to streamline intake and service delivery and will incorporate their agreements in their regional and local plans, as well as their MOUs and cost-sharing agreements. Finalization of these plans and agreements will trigger a broad-based initiative to determine how data systems can be integrated or data can be shared across the various data systems of all the required partners that participate in the workforce system over the next four years. Additionally, Colorado was awarded a WDQI grant in 2019 and is in the process of building a workforce longitudinal data system that will connect data across core programs.

In 2016 the CWDC convened a Job Seeker Services Alignment Team that included staff from all core programs, TANF, JVSG, and TAA. This group mapped out the customer experience across all of these programs and identified places of redundancy or inefficiency. In order to address the identified issues and enhance the customer experience, action teams were established that included a Common Forms team. This team worked to compare all intake forms, identify the unique required section, and then design a common form that could be used for multiple programs. This work was then amplified at the local level and local workforce areas further customized their intake processes so that every door is the right door to access needed services from the public workforce system.

A cross-training team was also launched from this alignment process and more than 1,000 staff members of all partner programs were trained on the basic elements of other programs and coached on how to partner effectively. This work resulted in enhanced localized referral procedures that improved the customer experience by minimizing bad referrals and increasing the likelihood that customers would follow through on recommendations made by a case manager/program staff.

A shared Learning Management System has now been implemented across partner programs that allows for efficient and consistent staff training. When staff have completed training they are better able to serve customers, including unemployed individuals, because they each have more knowledge of how other programs in the system operate and they can braid together services plans to meet all needs of customers.

As Colorado moves into this PY20-23 State Plan, data will be further connected by the establishment of the Colorado Data Trust. The CWDC serves as the Trustee for this group that allows for dynamic data sharing and matching in a highly secured environment. Use cases can be identified for the Trust that analyze data and serve customers in new ways by establishing needed linkages across platforms. The Trust will be a key component in the workforce longitudinal data system being implemented through the recently awarded Workforce Data Quality Initiative (WDQI) grant to CDLE. Finally, the Data Trust is critical back-end component of the My Colorado Journey platform, which offers career and academic exploration,

assessments, labor market information, and guidance to users--including unemployed individuals--on the their journey to gain employment and build a career path. My Colorado Journey is available to all core programs and workforce partners and through the Data Trust; results of training programs and career outcomes can be managed, analyzed, and reported.

Once the report requirements are finalized by USDOL, Colorado will contract with the Connecting Colorado system vendor to produce the PIRL and other required reports. System changes have already been completed to gather new required information and to calculate eligibility based on the proposed rules. These will be modified if needed to match the final regulations, but the changes were needed to allow WIOA-compliant enrollments. There are many other reports that will require changes based on the new WIOA performance and tracking requirements that are designed to provide information specifically for local boards. The Connecting Colorado system has been updated for the PIRL and other required reports as PIRL updates/edit checks are released by USDOL.

Adult education and family literacy providers will request and collect data at client in-take and will input into the AEI information management system. Through state agency data agreements, a data match will be conducted for employment, median earnings, credential attainment, and measurable skill gain for individuals served through adult education and family literacy as part of the Colorado talent development system.

DVR will work closely and collaboratively with the electronic case management vendor to produce necessary reports. Resources will be committed to support upgrades and maintenance of data collection and reporting—including the addition of new data tables, data fields and reports—to collect data on and assess new WIOA data requirements and performance standards. DVR will participate with the agency's vendor as part of a multi-state test environment to determine the functionality of the data collection and reporting applications and will provide feedback to the vendor.

Colorado has a state longitudinal data system in development under our Department of Education. Once this database is in place we should be able to more easily share data required for reporting under WIOA, but all needed data is being shared currently under existing data sharing agreements and processes. Current processes will be able to meet the reporting requirements until the integrated data warehouse is complete.

B. ASSESSMENT OF PARTICIPANTS' POST-PROGRAM SUCCESS

Colorado will use UI wage data to track job retention and wages across the core programs and Colorado Works through interagency agreements. For Colorado Works, the information is utilized to corroborate data collected through CBMS, and to inform any gaps between what is reported in the CBMS system and formal earnings records. Alignment projects between CBMS and Connecting Colorado are currently underway, and it is expected that upon completion, local areas as well as the state will be able to better understand the outcomes associated with Colorado Works customers served through the workforce system through comparison to other program codes already available. Further strategies between UI reports and CBMS integration will be pursued to eliminate manual data entry and reduce errors on human service programs.

Case management follow-up services will be used to assess the progress of participants exiting to jobs and post-secondary education. These approaches will be enhanced through the local MOU service agreements that are being developed with the required one-stop partners. At the state level Colorado will also work with its state partners to share data and develop methods to evaluate outcomes for participants served through their respective programs. DVR, specifically, will explore opportunities to work with core, combined plan and other partners to collect and

share data, including Annual Performance Report Indicator (APR) data required by the Individuals with Disabilities Education Act. DVR will also work closely with its electronic case management system vendor as the vendor develops and modifies their program in order to collect WIOA-mandated post-secondary and employment outcome data.

In addition, Colorado will incorporate evaluation strategies into all of its programs and initiatives, and develop additional outcome measures, such as wage progression, to help determine the effectiveness of strategies such as sectors and career pathways.

For Adult Education and Family Literacy programs, data about the progress of participants exiting the adult education and family literacy program into post-secondary education and training and employment will be analyzed annually as part of the program annual performance report process and the grant continuation application process. Data about advancement will be used by AEI in development of targeted technical assistance and promotion of best practices. Overall state assessment of participants' post-program success will be included in the statewide annual performance report submitted to the Department of Education Office of Career Technical and Adult Education.

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

All data needed to calculate and analyze performance for continuous improvement resides in Connecting Colorado. Wage records are uploaded quarterly to Connecting Colorado from the Unemployment Insurance data system, and currently Connecting Colorado maintains a file of wage data extending back to January 1996. This file is used in a variety of on-demand Connecting Colorado reports that track wage-based performance for Wagner-Peyser, WIOA Title I-B, TAA, and Veterans Employment and Training Services. Workforce areas and their partners with data sharing agreements have direct access to these reports (or can be provided these reports by the local workforce areas), which contain aggregated wage record information. Unemployment Insurance has formal data release agreements with the local workforce areas for their direct access to individual wage records available through the Colorado Unemployment Benefits System (CUBS).

D. PRIVACY SAFEGUARDS

The State of Colorado takes its responsibility very seriously to protect the privacy of individuals and their personally-identifiable information (PII). Connecting Colorado utilizes masked individual identifiers for online customer records and reports to ensure that the social security number (SSN) remains confidential. In addition, Connecting Colorado provides a multilevel system of access to data that is controlled by state and local administrators of the system. The level of access granted determines which screens and which data can be viewed by staff and whether individual staff has read only or data entry permissions. Industry standard encryptions ensure that data transfers between agencies are secure. CDLE has moved the Eligible Training Provider list to the CDHE to ensure further security of PII. CDHE receives student information under FERPA (20 U.S.C. 1232g) as an educational entity, and CDHE also receives Colorado Unemployment Insurance Wage data on an annual basis. CDHE can match the student cohort data with the wage records provided to easily calculate performance for training programs in Colorado without compromising PII since all data calculations happen securely within CDHE. Performance is always aggregated and never presented at an individual level that might compromise the anonymity of students. This process will allow the schools to drop expensive surveys they have been forced to perform for any program that had to be on the Eligible Training Provider list in order to gather results for the "All Students" section. In addition, it will

make the performance results much more consistent, since the results will all be based on Colorado Unemployment Insurance Wage data.

DVR will maintain adherence to federal regulatory requirements around confidentiality and state requirements around personally identifiable information (PII) through staff training related to confidentiality of customer information. Additionally, DVR has and will continue to maintain processes and procedures that support the HIPAA level of confidentiality within its electronic case management system.

Within SCSEP, the privacy of participants, host agencies and employers is protected and stored in locked files that are not accessible to anyone other than authorized personnel. Data that is transmitted via the internet is sent encrypted, and only authorized personnel have access to the electronic files. Participants are given the option of providing their social security numbers for administrative purposes, and they are also asked to sign a consent form allowing release of information for the purpose of enhancing and marketing SCSEP.

The Colorado Department of Education (CDE) takes seriously its obligation to protect the privacy of Personally Identifiable Information (PII) collected, used, shared, and stored by CDE. CDE does not disclose student PII unless the disclosure is permitted under the Family Educational Rights and Privacy Act (FERPA) and covered by the appropriate agreements as required by Colorado's Student Data Transparency and Security Act (SDTSA) [C.R.S. 22-16-101 et. seq.]. These agreements are required for any individual or entity that receives student PII from CDE. In addition, those individuals or entities receiving student PII from CDE are required to ensure that their subcontractors contractually agree to comply with the requirements of SDTSA. CDE's contractual agreements include specific information security and privacy requirements, including, but not limited to, incident response procedures and requirements, the encryption of student PII at rest and in transit, limitation on the uses of student PII to only what is specifically stated in the agreement, destruction of student PII upon the termination of the agreement, best practices around the use of technology, limited data access, and requirements to remove personally identifiable information from public reporting. Violations of these agreements can result in the immediate termination of the agreement, a halt to all data sharing, and, under the requirements of FERPA, a prohibition from sharing student PII with the violating entity for a period of five years. In addition, all previously shared student PII will need to be immediately destroyed.

Colorado Works is guided by CCR 3.609.94: Protections to the Individual, which specifies that all information concerning an applicant or recipient is confidential and the exclusive property of the state and county departments of human services. Unless disclosure is specifically permitted, no information will be released to other agencies or individuals. By signing the application for assistance, clients agree to allow county departments to get and share information with any of the following agencies: Social Security Administration, Internal Revenue Service, United States Customs and Immigration Services, Colorado Department of Labor and Employment, financial institutions, child support agencies, employers, courts or other law enforcement agencies. Information may also be shared with county, state and federal auditors and individuals executing the Income and Eligibility Verification System (IEVS). Permission to release information to advocate agencies that apply for, or act on behalf of, an individual is implied, as long as the county department is reasonably sure the confidential nature of the information will be preserved. All other disclosure of information to agencies or individuals not listed above requires a formal, written release from the applicant/recipient.

County departments of human services are expected to provide privacy during client interviews and are instructed to set up facilities in a way that ensures information is not inadvertently

revealed. County workers must also use discretion outside the office, by not mentioning department business or any other confidential information. Storing of county records is located at 3.603, Case File Maintenance and outlines the responsibility for county departments to provide a location to store files in a safe place in order to prevent accidental disclosure of confidential information.

7. PRIORITY OF SERVICE FOR VETERANS

Since the enactment of the Jobs for Veterans Act in 2002, Priority of Service has been established in the State of Colorado under policy guidance issued by the Colorado Department of Labor and Employment. Priority of Service, as required by 38 U.S.C §4215 and 20 C.F.R. 1001 and 1010, is provided to ensure veterans and covered persons receive consideration for all opportunities, for which they qualify, funded in whole or part by the United States Department of Labor. After receipt of state policy, local AJC's are required to develop and implement internal veterans' Priority of Service policies and procedures after review and approval by the State Veterans Program Coordinator. Each year they are required to submit their local policy to the State Coordinator for review, particularly when changes have been made. The Priority of Service regulations require that local AJC's implement policies and procedures that:

- Identify veterans and eligible persons at point of entry (physical locations, web sites, and other virtual service delivery resources);
- Advise veterans and eligible persons of their entitlement to Priority of Service;
- Make veterans and eligible persons aware of the full array of employment, training and placement services available; and
- Identify applicable eligibility requirements for programs and services.

Services are made available and provided to eligible veterans transitioning service members, chapter 31 veterans, Native American veterans, and other groups targeted for special consideration like SBE veterans on a priority basis. If "entry" is made via Colorado Department of Labor and Employment website under "Veterans", "Veteran Priority", and "Veterans are a priority" Veterans are made aware of their entitlement to Priority in all of Colorado's Workforce Center services, and have the opportunity to work with the highly skilled, professional workforce Center staff to find a job that maximizes potential. If a veteran or covered person is making "entry" via the Connecting Colorado statewide database they are made aware of their entitlement to Priority of Service through information on the registration page as well as at the end of the registration process. Additionally, veterans or covered persons who enter the workforce system via a local workforce center office are made aware of their entitlement to Priority of Service by signage posted in the local office. The signage advises veterans of their entitlement for Priority of Service and directs them to speak with workforce center staff regarding their eligibility for Priority of Service and the eligibility requirements for a particular program or service.

Priority of Service in Programs: AJCs that operate programs which deliver services to the public as a whole (without targeting specific groups), veterans and eligible persons will receive Priority of Service over all other program participants. The primary universal access services are the "core" services delivered through the AJC staff under the Wagner-Peyser and WIOA programs. Veterans and eligible persons receive the first level of priority in universal access programs.

1. Some programs are required by law to provide a priority for a particular group of individuals or require the program to spend a certain portion of program funds on a particular group of persons. For programs with this type of statutory priority, AJC program operators will determine the status of each individual veteran or eligible persons and apply Priority of Service as described below:

    a. Veterans and eligible persons who meet the mandatory priorities and program eligibility must receive the highest level of priority for the program or service;

    b. Veterans and eligible persons who do not meet the program-specific mandatory priority or spending requirement or limitation then receive the third level of priority for the program or service;

    c. Non-covered person who meet the program-specifics mandatory priorities and program eligibility then receive the second level of priority for the program or service;

    d. Non-covered persons outside the program-specific mandatory priority or spending requirement or limitation then receive the fourth level of priority for the program or service.

2. Some qualified job training programs may include a focus on a particular group or make efforts to provide a certain level of service to a particular group without the authorizing law specifically mandating that the target group be served before other eligible individuals. For this type of discretionary focus, Priority of Service will be applied as described below:

    a. Veterans and eligible persons who meet program eligibility and target population;

    b. Veterans and eligible persons who meet program eligibility but not target population;

    c. Non-covered persons who meet program eligibility and target population;

    d. Non-covered persons who meet program eligibility but not target population.

3. State policy requires that all AJC's establish policy on recruitment, intake and enrollment of Veterans within programs offered, to ensure that veterans are notified, reviewed, and enrolled before non-veterans. In incidences where it has been noted that the veterans who have applied for but not completed the registration and/or enrollment requirements within a program, AJC staff are required to outreach to the veterans encouraging them to complete the process. Their outreach efforts must be documented before the application and/or enrollment is closed. Documentation must show that various means were used to outreach to the veterans.

Priority of Service in Employment Opportunities: When job orders are entered into the state's automated database, Connecting Colorado, whether manually or virtually, they are placed in a 4 hour "vet hold" status. This allows only Veterans who have all required skills and who meet all required qualifications to be identified and contacted as suitable candidates before being released for review by non-veterans. The veterans are contacted about this job opportunity using our Integrated Voice Response (IVR) system which automatically emails all qualified veterans first and relays the information about the job opportunity and how to apply for the position. After each IVR email, a note is automatically entered into the applicant's record with

information about the job posting. This noted information allows the JVSG supported staff and AJC staff to assist the Veterans if and when the Veterans call in regards to the job posting(s).

1. When the automated email generated by the IVR fails to reach the targeted Veteran due to a bad email address, a non-delivered notice is posted within the system. In the demonstration of providing Priority of Service, state policy requires that an attempt to contact the Veteran is made and can be by phone and/or post card. These additional attempts to contact the veteran are the responsibility of the AJC staff - not the JVSG staff.

2. When a job order is placed in Connecting Colorado system, a list of qualified veterans can be generated and viewed by the posting Employer, JVSG and/or, AJC staff. This generated list places all Veterans, beginning with Special disabled, disabled and then all other veterans, ahead of qualified non-veterans in accordance with 20 CFR Part 1001. When the automated applicant list is generated and AJC staff notices that the generated list contains little to no qualified veterans, they will conduct a manual search as a demonstration of Priority of Service. This manual applicant search acts as a safeguard to ensure that qualified veterans, even if there is one, is given priority within job search services.

The demonstration of Priority of Service is the responsibility of AJC staff. It is also the responsibility of the State and County leadership to ensure that Priority of Service is being successfully demonstrated by providing training, technical assistance and monitoring accomplished by the Local Veteran Employment Representative, CDLE Monitors, State Veterans Program Coordinator, CDLE Regional Directors, and Veteran Program Managers. Methods and means used to verify whether or not Priority of Service is being provided will be the following but are not limited to:

- Vets 9002 and 200 Report
- Interviewing of AJC staff
- State monitoring tool
- Review of program files and documentation
- Customer surveys
- Site visits
- Accompanying DVET during federal audits
- Quarterly Managers Report

Regarding the referral process for veterans with significant barriers to employment to Disabled Veteran Outreach Program specialists, the local American Job Center (AJC) staff is responsible for providing an initial assessment at the physical workforce center point of entry or if the triage form is submitted virtually, contacting the veteran by phone. This triage is a two-part triage process that is conducted first for the purpose of determining whether or not a service member, veteran and/or spouse/eligible person is eligible to receive DVOP services. Secondly, SBE eligible veterans and/or other eligible persons may be referred for DVOP services only after they have received an initial assessment to address and determine their level of need. This part of the assessment includes, but is not limited to, verifying the accuracy of information provided during the Connecting Colorado registration, and determining the basic job readiness and the extent of AJC services needed by the individual.

Once a service member, veteran and/or eligible spouse/eligible person has been deemed eligible for DVOP services, the AJC staff member then notifies the DVOP specialist either through email, phone or physically walking the individual over to the DVOP specialist. The triage checklist, or the locally approved version, must be uploaded to Connecting Colorado by the AJC staff and attached to the individual's CC record to prevent veterans returning to the AJC or crossing regions from being subjected to multiple triages. Although the two-part triage process identifies those eligible for DVOP services, the AJC is ultimately responsible for providing employment services to all registered individuals who are seeking assistance. The intent for assigning DVOP and LVER staff to the AJC is to supplement and not supplant the duties of the AJC staff when providing services to veteran customers. In addition, in offices where no DVOPs are stationed, the AJC staff is expected to provide the same level of needed intensive services while providing the service member, veteran and/or spouse/eligible person the option of making an appointment to be seen by a DVOP specialist during a scheduled meeting.

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

Colorado has a rich history of going above and beyond the compliance requirements of Section 188 of the Workforce Investment Act (which are now incorporated in Section 188 of WIOA), and the American's with Disabilities Act of 1990. Over the life of the Workforce Investment Act, Colorado's one-stop system was governed by a comprehensive set of state policies regarding non-discrimination and accessibility that are in the process of being updated with the most current requirements. These policies include a robust system of monitoring to ensure that one-stop center programs practice non-discrimination and that centers accommodate the needs of those with disabilities. In addition, Colorado served as a lead state in the national Disability Navigator initiative between 2002 and 2009, providing technical assistance to other states and participating in the national evaluation process. During that time, the one-stop system partnered with Assistive Technology Partners, who worked with staff on the purchase of assistive technology and trained staff in its use.

Colorado builds upon its past successes by strengthening its partnership with the Division of Vocational Rehabilitation, which became part of the Colorado Department of Labor and Employment as of July 1, 2016. As the leases for local DVR offices come up for renewal, there will be an effort to co-locate with one-stop centers. DVR staff is also preparing to provide ongoing training to their one-stop colleagues within the core programs and assist with the procurement and installation of more current assistive technology. Colorado's one-stop certification policy includes the following criteria related to accessibility:

Physical and programmatic accessibility - ADA Guidelines: In compliance as shown by an inspection, audit, or review within last 3 years

Colorado applied for and received a $2.25 million Disability Employment Initiative grant from USDOL that was implemented during 2018 and provides increased access to one-stop career and training services. WIOA Title I funds are leveraged with grant funds to ensure increased training and employment opportunities for the disabled population.

The Disability Employment Initiative (DEI) Grant is a capacity building, systems-change initiative with strategies to assist state agencies and Workforce areas to provide effective and integrated Workforce Innovation and Opportunity Act (WIOA) services and improve programmatic and physical access to adults with disabilities.

The three strategic approaches are to

1. Increase access to and the participation of individuals with disabilities in WIOA funded employment and training services, particularly those related to career pathways, in partnership with Vocational Rehabilitation (VR) programs; community colleges and other education entities; human service agencies; and business partners;
2. Improve training and employment outcomes for individuals with disabilities and support businesses;
3. Increase the number of workforce entities functioning as Employment Networks (EN). An EN is an entity that enters into an agreement with the Social Security Administration (SSA) to either provide or coordinate the delivery of services to SSA disability beneficiaries.

The grant began on October 01, 2017 and will end on September 30, 2020.

Partners and members of the DEI Grant State Leadership Team:

- Colorado Workforce Development Council (Education & Training Committee)
- Colorado Department of Labor and Employment, Division of Vocational Rehabilitation
- Colorado Department of Education, Adult Education Initiatives
- Colorado Department of Human Services, Office of Behavioral Health, Recovery Services
- Emily Griffith Technical College
- Arapahoe/Douglas Works!
- City and County of Denver, Office of Economic Development, Workforce Services
- Pikes Peak Workforce Center
- Broomfield Workforce Center

Outcomes: by September 2020 DEI partner Workforce areas will enroll a total of 216 (or greater) adults with disabilities into WIOA Adult and Dislocated Worker programs, provide increased outreach to businesses and provide seamless services to workforce center customers with disabilities.

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

Colorado is committed to ensuring that local areas take reasonable steps to provide "meaningful access" to their workforce programs and services by English Language Learners. Colorado has established policy on language assistance in State Policy Guidance Letter ADM-2019-05: Language Assistance Plan Guidance, which includes the state's language assistance plan. Local areas are required to submit a Language Assistance Plan (LAP) or updated plan to the State biannually by June 1 of each year. The purpose of the Language Assistance Plan is to establish the need for language assistance services and to outline the process for responding to that need. The outcome of implementing a Language Assistance Plan is that language barriers have been removed enough to allow meaningful access to workforce programs by ELL customers.

IV. COORDINATION WITH STATE PLAN PROGRAMS

Since January 2015 the WIOA Implementation Team has met to coordinate efforts in the development and execution of the combined state plan. This team includes representatives from

required one-stop partner programs and it has met on a consistent basis since 2015. The Implementation Team assisted in the design of the strategic planning process and helped to develop the input process that was undertaken across all partner programs. Focus groups and surveys were conducted with partners and programs throughout Colorado to identify the strengths and weaknesses and opportunities for the system. This data was synthesized by the Implementation Team to develop the strategies outlined in section II of this plan. Combined plan partners reviewed draft versions of the goals and strategies and worked together on the development of section III. Each program has had the opportunity to review and comment on these sections of the plan prior to publication for public comment.

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 other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);	Yes
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes

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

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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

A. GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

Colorado has identified three planning regions, a map of which can be found here: https://www.colorado.gov/pacific/cwdc/workforce-partners. They are as follows:

1. Central Planning Region - Adams, Arapahoe, Boulder, Clear Creek, Denver, Douglas, El Paso, Gilpin, Jefferson, Larimer, and Teller Counties
2. Rural Colorado Planning Region - Cheyenne, Elbert, Kit Carson, Lincoln, Logan, Morgan, Phillips, Sedgwick, Washington, and Yuma Counties; Eagle, Garfield, Grand, Jackson, Lake, Moffat, Pitkin, Rio Blanco, Routt, and Summit Counties; Alamosa, Baca, Bent, Prowers, Chaffee, Conejos, Costilla, Crowley, Custer, Fremont, Huerfano, Kiowa, Las Animas, Mineral, Otero, Park, Pueblo, Rio Grande and Saguache Counties; Archuleta, Delta, Dolores, Gunnison, Hinsdale, La Plata, Mesa, Montezuma, Montrose, Ouray, San Juan, and San Miguel Counties; Broomfield
3. Weld County Planning Region

Colorado's ten federally-recognized local workforce areas, a map of which can be seen here: https://www.colorado.gov/pacific/cwdc/workforce-partners, are as follows:

1. Adams County
2. Arapahoe and Douglas Counties
3. Boulder County
4. City and County of Denver
5. Larimer County

6. Mesa County
7. Pikes Peak Workforce Area - El Paso and Teller Counties
8. Tri-County Workforce Area - Jefferson, Gilpin, and Clear Creek Counties
9. Weld County
10. Colorado Rural Workforce Consortium - consisting of 51 counties divided into 10 sub-areas:

- Broomfield Sub-Area
- Eastern Sub-Area: Cheyenne, Elbert, Kit Carson, Lincoln, Logan, Morgan, Phillips, Sedgwick, Washington, and Yuma Counties
- Northwest Sub-Area: Grand, Jackson, Moffat, Rio Blanco, and Routt Counties
- Pueblo County Sub-Area
- Rural Resort Sub-Area: Eagle, Garfield, Lake, Pitkin, and Summit Counties
- South Central Sub-Area: Alamosa, Conejos, Costilla, Mineral, Rio Grande, and Saguache Counties
- Southeast Sub-Area: Baca, Bent, Crowley, Huerfano, Kiowa, Las Animas, Otero, and Prowers Counties
- Southwest Sub-Area: Archuleta, Dolores, La Plata, Montezuma, and San Juan Counties
- Upper Arkansas Sub-Area: Chaffee, Custer, Fremont, and Park Counties
- Western Sub-Area: Delta, Gunnison, Hinsdale, Montrose, Ouray, and San Miguel Counties

Process for Designating Local Areas:

The Colorado Workforce Development Council (CWDC) consulted extensively with local officials, local boards, partner agencies, and community organizations to assist with the identification of locally designed and supported areas consistent with the articulated needs of the communities. The CWDC determined the procedures for requesting initial and subsequent designation of local areas and the requirements each area must meet in state Policy Guidance Letter 15-04-WIOA and in Policy Guidance Letter WIOA-2015-01, Change 2. The local areas were required to detail in their request and operating plan how the requested local area would meet the criteria identified in the law for "performed successfully" and "sustained fiscal integrity." The designation process began with the prior designated areas that operated under the Workforce Investment Act. All local officials reviewed the labor market areas and their ability to deliver WIOA services and then submitted their requests for designation as a local area to the CWDC and Governor. Meetings were held with county officials, one-stop operators and local boards for discussions. The nine original local areas requested initial designation, plus Mesa County requested separation from the Rural Consortium as an independent local area. All requests for initial designation were approved by the Governor. All local areas also submitted documentation as required for the subsequent designation process and were subsequently designated.

Procedures for Determining Performed Successfully and Sustained Fiscal Integrity:

Each local area seeking designation is required to submit documentation for the following items to the CWDC for review and recommendations to the Governor for final approval:

Performed Successfully:

Evidence that the area, in the two program years for which data is available prior to the request, met or exceeded the adjusted levels of performance for primary indicators of performance or the Common Measures for Title I and Title III programs, and was not subject to the sanctions process resulting from missing the same measure two years in a row, as applicable.

Fiscal Integrity:

Evidence that during the two program years prior to the request, the U.S. Secretary of Labor, or the State in place of the Secretary, has not made a formal determination that the grant recipient or administrative entity for the local area has misspent funds due to willful disregard, gross negligence, or failure to comply with accepted standards of administration, as applicable.

Process for Designating Planning Regions:

The CWDC convened a workgroup of local workforce partners that was chaired by a local area director and the Director of the CWDC. This group reviewed existing regional maps that had been developed by various partner agencies for purposes of delivering program services. In addition, the workgroup examined worker commuting patterns, locations of key industries and the presence of existing partnerships that cut across geographic boundaries. The resulting map that was developed took these factors into consideration. Local Elected Officials reviewed the map and had the opportunity to request changes to best meet the needs of each local area. In advance of the state plan modification period in 2018 and during the PY20-23 state plan creation process, local areas were invited to request changes to the planning regions. In 2018 a change was requested and granted, creating the three planning regions that are still recognized at this time. There were no changes requested during this planning process.

The following is excerpted from Colorado's Policy Guidance Letter WIOA-2015-01, Change 2 regarding the designation of local areas:

APPEALS PROCESS POLICY: An area or areas seeking to be designated or re-designated, as a Local Workforce Development Area, which has requested but has been denied its request for designation or re-designation as a Local Area, may appeal the decision to the Colorado Workforce Development Council.

1. An appeal must be in writing and filed with the Colorado Workforce Development Council within fourteen (14) days after notification of the decision. Submit the appeal to the Chairperson of the Colorado Workforce Development Council (CWDC) and to the Director of the CWDC by sending an email to cwdc@state.co.us.
2. The appeal must contain a specific statement of the grounds upon which the appeal is sought.
3. The State board will have 60 days to review the appeal and make a recommendation to the Governor. The review will take into account the information in the original request and supplemental information provided in the appeal to determine if the criteria set in this policy has been met.
4. The final decision rests with the Governor.

5. If the appeal is connected to a request for initial or subsequent designation, and if the appeal does not result in designation, the entity may request review by the Secretary of Labor to determine if procedural rights were granted or if the minimum criteria of WIOA Section 106(b)(2) or Section 106(b)(3) were met. This second level of appeal must be sent within 14 days to:

Assistant Secretary of Employment and Training

U.S. Department of Labor

200 Constitution Avenue, N.W.

Washington, DC 20210

A copy of the appeal must be simultaneously provided to the:

ETA Regional Administrator

U.S. Department of Labor

525 S. Griffin Street

Dallas, TX 75202

In addition, a copy must be sent to the CWDC at cwdc@state.co.us.

If the final decision of any appeal reverses the prior decision, it will become effective July 1st of the following year.

APPEALS PROCESS POLICY: A local area, or a local area on behalf of a partner agency, may appeal the Governor's determination of the portion of funds to be provided for infrastructure costs, to the Colorado Workforce Development Council.

1. An appeal must be in writing and filed with the Colorado Workforce Development Council within fourteen (14) days after notification of the decision. Submit the appeal to the Chairperson of the Colorado Workforce Development Council (CWDC) and to the Director of the CWDC by sending an email to cwdc@state.co.us.
2. The appeal must contain a specific statement of the grounds upon which the appeal is sought.
3. The State board will have 60 days to review the appeal and make a recommendation to the Governor. The review will take into account information provided in the appeal on the basis that such determination is inconsistent with the requirements of state policy and/or WIOA Section 121(h).
4. The final decision rests with the Governor.
5. If the final decision of any appeal reverses the prior decision, it will become effective as of July 1st of the program year.

2. STATEWIDE ACTIVITIES

Statewide Policies and Guidance: Colorado has established a public website that contains the Policy Guidance Letters for the workforce development system, which address both the

programmatic and administrative requirements for utilization of state funds for workforce development activities. All policies can be accessed at: www.colorado.gov/cdle/pgl

Currently Colorado is completing the process to achieve WIOA compliant policies and adding policies that provide guidance regarding new items such as work-based learning opportunities and other aspects of WIOA not previously required by the Workforce Investment Act. The policy development process involves the participation of key state and local partners on cross-functional teams that provide critical input regarding content of the policies. A final draft of each policy is also distributed to state and local partners for comment prior to publication on the website. Policy modifications can be made as additional guidance is received from federal departments or specific needs are identified by one-stop system providers and partners.

Governor's set aside funding:

Colorado expects to utilize 10% of the Title I set aside funds for the administrative purposes allowed under Sections 128 and 133 of WIOA, and the remaining portion of the set aside for both the required statewide activities, as well as the allowed statewide activities that support the strategic goals set forth in this four-year Combined Plan. On an annual basis, the Colorado Workforce Development Council prepares a recommendation for the Governor on the use of funds. After the Governor has approved the priorities for the funds, the CWDC approves a specific budget for Council Initiatives. These initiatives will support the strategies outlined in this state plan as follows:

- Formulate, test and scale the braiding and blending of funding across programs
- Enhance the execution of SNAP 50/50 so that all communities are maximizing available resources
- Promote collaboration models between Colorado Works and workforce programs
- Educate Coloradans on all career pathways through the enhancement of My Colorado Journey
- Increase the flow of individuals into the network through educator training on existing resources and career advisor training
- Map and promote in-demand industries in a future-ready way with embedded opportunities for work-based learning and apprenticeships
- Focus on career attachment strategies with a path to prosperity
- Create lifelong upskilling opportunities with earn and learn approaches
- Strengthen the alignment and information sharing across programs
- Support local boards in engaging businesses and key employers to address community issues such as childcare, transportation, and affordable housing

State's Rapid Response and layoff aversion activities:

The State Rapid Response Team uses a variety of approaches and strategies to avert and respond to layoffs. These include the early identification of at-risk industries and companies through utilization of a variety of data including labor market analyses, layoff trends, and policy analysis including the impact of federal, state and local policies and regulations on businesses

and industries. State unemployment insurance company layoff data is used to identify layoff trends and specific companies that are approaching WARN levels. These data are used to conduct outreach activities to businesses whose employees might benefit from Rapid Response services.

Additionally, the State Rapid Response team provides resources and technical assistance to local area Rapid Response staff who are charged with developing local layoff aversion plans. These annual plans include additional strategies to address the following:

- Ongoing engagement, partnership and relationship building activities with businesses in the community in order to create an environment for successful layoff aversion efforts and the provision of assistance to dislocated workers in obtaining reemployment as soon as possible.
- Partnering or contracting with business-focused organizations to assess risks to companies, propose strategies to address those risks, implement services, and measure the impact of services delivered.
- Funding feasibility studies to determine if a company's operations may be sustained through a buyout or other means to avoid or minimize layoffs.
- Developing, funding and managing incumbent worker training programs or other worker upskilling approaches.
- Connecting companies to State provided short-term compensation or other programs designed to prevent layoffs or to quickly re-employ dislocated workers, employer loan programs for employee skill upgrading and other federal, state and local resources as necessary to address other business needs.
- Establishing linkages with economic development activities at the federal, state and local levels including the Federal Department of Commerce programs and available State and local business retention and expansion activities.
- Engaging in proactive measures to identify opportunities for potential economic transition and training needs in growing industry sectors or expanding businesses.

The State Rapid Response Team has formed collaborative partnerships to identify and design appropriate interventions. Partnerships include Colorado's local workforce areas and Workforce Development Boards, the U.S. Department of Commerce's Trade Adjustment Assistance program for firms, Chambers of Commerce, Small Business Development Centers, State agencies such as the Office of Economic Development and International Trade, the Public Health Department, and Vocational Rehabilitation, community-based organizations and quasi-governmental organizations such as Connect for Health Colorado (Colorado's healthcare exchange).

Rapid Response early interventions may include a variety of services tailored to the needs of the company and its employees and may include onsite or virtual workshops, onsite registrations, orientations and intakes for WIOA and TAA, and onsite "reverse" hiring events at which dislocated workers are connected with companies hiring for similar positions.

In the event of a natural or other disaster, the state initiates an emergency protocol, and the Rapid Response team mobilizes and convenes an emergency team. If the disaster has affected operations of the workforce agency itself, an established Continuity of Operations plan and

communication protocol is initiated. The emergency team coordinates with FEMA, local entities, and partners to identify the impact of the disaster, the demographics, and the needs of those affected and the resources available to conduct outreach and deliver needed services to impacted individuals. Assistance includes access to UI or disaster unemployment assistance, support for mobile one-stop units, demographic information gathering for potential emergency grant applications and coordination with FEMA, Red Cross or other disaster response organizations. State and local area rapid response providers work closely with other state and local agencies and other critical partners through an established strategic planning process to ensure effective and immediate responses.

Early Intervention is provided to worker groups through a coordinated and tightly integrated response team consisting of TAA and Rapid Response Coordinators from both the state and local levels, who are cross-trained in both programs. Cross training improves access to services and ensures that TAA filings are complete and accurate for investigations and determinations. Response coordination is reciprocal. When receiving a Worker Adjustment Retraining Notification (WARN), the State Rapid Response Coordinator routinely reaches out to the Company to confirm the separation details provided in the letter and to probe further to determine if there are foreign trade impacts. If foreign trade impacts are confirmed either by the employer or through research, the State Rapid Response Coordinator or the Local Area TAA Counselor files a TAA petition.

When receiving a WARN letter from a company affected by foreign trade, the State Rapid Response team immediately notifies the TAA team and includes TAA personnel in the early planning stages with the company to identify the needs and the services required to meet those needs. Services delivered to the company include, but are not limited to, joint Rapid Response/TAA workshops at the customer location to provide information on TAA/TRA services and benefits, onsite workforce registrations and TAA/WIOA orientations, and one-on-one meetings with TAA Counselors and other professionals as needed. Workshops also include Unemployment Insurance Benefit information as well as information on other employment and training services and grants available to employees.

The State Rapid Response team also routinely monitors TAA petitions and certifications to determine if Rapid Response services have been previously delivered. If not, the Rapid Response team works closely with the TAA team as part of the planning process and collaborates to deliver services. As TAA petitions become certified, the TAA Coordinator immediately notifies the Rapid Response Coordinator. Outreach and dissemination of TAA and Rapid Response information may occur via email, direct mail, press announcements and articles, websites including partner websites, radio and television public service announcements, flyers posted at the workforce centers as well as You Tube sites, Facebook, Twitter and other social media. Rapid Response and TAA teams also collaborate with partners to conduct workshops, present at conferences, trade shows, professional associations, Chambers, clubs and other outreach events.

B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS

1. WORK-BASED TRAINING MODELS

Work-based learning is a critical component of the education and training that Coloradans will need for the jobs of the future. In 2017, CDLE established a Work-based Learning (WBL) Unit to put job-specific experiential learning at the forefront. In fulfilling the vision set forth in the Governor's state-wide economic strategy and the Colorado Workforce Development Council, the WBL Unit creates vision and opportunity at the state and local levels. The WBL unit administers

grant-funded work-based learning initiatives, promotes best practices from leading work-based learning programs nationally and globally, and assists efforts to expand and transform sector partnerships with industry, and create Career Pathways to help job seekers. CDLE implemented a piece of workforce legislation passed in the 2015 state legislative session that provides work-based learning opportunities. HB15-1230, Innovative Industries Workforce Program, provides support for creating a common collaborative structure for paid internships with businesses.

2. REGISTERED APPRENTICESHIP

Colorado recognizes that Registered Apprenticeships (RAs) are an important component of potential training and employment services that the workforce system can provide to its business customers and job seekers. RAs are a key component within a spectrum of work-based learning activities that are used to create opportunity for both industry and job seekers in Colorado. Local service providers will be expected to utilize RAs as a career pathway program for job seekers and as a job-driven strategy for employers and industries. Regional and local plans will address the inclusion of RAs in sector strategies and ensure that RAs are an integral part of the work based learning options that WIOA customers may access. The state will provide training, technical assistance and access to USDOL's RA resources to encourage and foster the use of existing programs, as well as the development of new RAs. Local workforce boards will be expected to develop local policies and procedures to implement RAs, which may include the use of pre-apprenticeships, Individual Training Accounts and On-the-Job Training awards to customers who wish to start an apprenticeship or complete an apprenticeship in progress.

Central to this strategy of creating industry-led opportunity is the work done under the ApprenticeshipUSA State Apprenticeship Expansion Grants. The purpose of this grants is to strengthen RA efforts by expanding the industry sectors and range of occupations involved and increasing access to RAs for more diverse and underrepresented populations. This work is aimed at fundamentally changing the way Colorado's workforce and educational systems approach employment and training for youth and adults. RAs allow employers to design programs with specific skills, training and job-related instruction tailored to the company's needs and are considered the "gold standard" for apprenticeship training in the United States. Statewide, over a dozen new RA programs have been created and over 450 apprentices placed in new and existing apprenticeship programs through partnerships and opportunities fostered through this grant. Catalysts to RA expansion include CDLE's dedicated apprenticeship coordinator, technical support to industry associations, and a key partner in the creation of youth apprenticeships, CareerWise Colorado.

The investment of the State Apprenticeship Expansion grant has led to deep coordination across state and local agencies. The Apprenticeship State Expansion grant efforts will build out the necessary infrastructure to support this activity and serve more individuals and businesses. The funds will be used to support coordination with DOC, DVR, CDHE, and DORA, as well as build out the longitudinal data systems for participant outcomes tracking and ETPL improvement.

3. TRAINING PROVIDER ELIGIBILITY PROCEDURE

Colorado is currently updating the policy guidance letter regarding the training provider elgilibity procedure to meet all requirements outlined in TEGL 8-19. The draft policy is availlable at this link. The policy is expected to be finalized and fully executed by May 31, 2020.

In summary, the PGL provides guidance on the following items:

- The initial eligibility online application process, to include data regarding:

- A description of each program of training services to be offered;
- Information on cost of attendance, including costs of tuition and fees;
- Whether the training program leads to an industry-recognized certificate or credential, including recognized post-secondary credentials;
- Whether the provider has developed the training in partnership with one or more businesses (and the names of the businesses);
- Which in-demand industry sectors and occupations best fit with the training program;
- A description of the prerequisites or skills and knowledge required prior to the commencement of training; and
- Social security numbers for all students residing in Colorado, regardless of funding source.
- Factor related to WIOA performance indicators: Initial eligibility criteria requires the training program to identify whether it leads to an industry-recognized certificate or credential, including recognized post-secondary credentials, and to identify the credential.

- The continued eligibility online application process, to include updates to the initial eligibility data and the following information:
  - The total number of participants enrolled in the program;
  - The total number of participants completing the program;
  - The total number of participants exiting the program;
  - Information on recognized post-secondary credentials received by program participants;
  - Information on the program completion rate for such participants;
  - Description of how the provider will ensure access to training services throughout the State, including rural areas and through the use of technology;
  - Description of how the providers provide training services to individuals who are employed and/or individuals with barriers to employment;
  - Information reported to State agencies on Federal and State training programs other than programs within WIOA title I-B; and
  - Social security numbers for all participants in Colorado for the two previous years, regardless of funding source, which will be used to calculate the performance measures
  - Program Quality and Performance data: Colorado policy states "Minimum performance targets have not been set as eligibility criteria for training programs to remain on the ETPL. Available performance information for each program will be posted on the ETPL to help consumers make an informed decision. Once a full cycle of WIOA performance information becomes available, this policy will be revised to establish minimum performance targets for

programs to remain on the ETPL." (p. 6) Colorado has experienced technical delays and as a result it is still building out its ETPL system to collect Social Security Numbers and calculate the WIOA performance indicators. Brighthive, our data trust vendor, has developed a tool called "Abacus" to assist with this process. Abacus will calculate the following indicators:

- Percent of participants employed 2Q after the program exit date
- Percent of participants employed 4Q after the program exit date
- Mean wage for participants 2Q after the program exit date
- Mean wage for participants 4Q after the program exit date
- Median wage for participants 2Q after the program exit date
- Median wage for participants 4Q after the program exit date
- Count of participants earning a credential

The plan is to have the SSN uploader complete by June 2020 and accessible to the providers to use during July - August. In September CDLE will scrub the data with a deadline to lock the cycle on October 1. Assuming all goes well, matching with Unemployment Insurance data would happen during October, so the data should be available by November. Our goal is to have the outcome data publicly available by the end of 2020.

- Accessibility: Under the continued eligibility criteria, the Colorado policy states "Applications for continued eligibility must...include the following:...Description of how the provider will ensure access to training services throughout the State, including rural areas and through the use of technology;" (p. 5-6). If providers do not provide an adequate description of how they will ensure accessibility, then the provider will not be approved for continued eligibility.

- Process for WIA approved training providers to transition to WIOA approved training providers
- The roles of the three entities involved in the determination of training provider eligibility:
    - The Colorado Department of Labor and Employment establishes the eligibility criteria and approval process, submits performance reports, and takes enforcement actions against providers that provide false information or violate the requirements of WIOA.
    - The Colorado Department of Higher Education hosts the ETPL website, reviews applications for minimum eligibility and/or performance requirements, and notifies local boards and CDLE regarding new requests for initial or subsequent eligibility once online applications are completed and reviewed. They also mark programs eligible for WIOA funding that have been approved by Local Boards and remove programs that don't meet required criteria or performance standards.
    - Local Workforce Development Boards may identify local eligibility criteria in addition to those set by the state, plus they will review initial and subsequent applications and either approve or disapprove programs according to state and

local standards. The decision of each local board determines whether a program may be utilized in its respective local area. Local boards may also request the removal of a program for cause based on local and state standards.

Registered Apprenticeships: In partnership with USDOL's Denver Office of Registered Apprenticeship, all active apprenticeship programs are automatically eligible for ETPL placement. Registered Apprenticeship Programs apply through the online system and are only required to provide the five data elements per the TEGL. The Colorado policy states *"When a registered apprenticeship program submits an online application, the state will verify the registered apprenticeship program number and the program will be automatically approved statewide." (*p. 5*)*. Registered apprenticeship programs will not be subject to the same application or performance reporting requirements as other training providers because they go through a detailed application and vetting procedure to become a Registered Apprenticeship program sponsor with USDOL. Any apprenticeship program may remain on the ETPL as long as it wishes if it remains registered by the USDOL Office of Registered Apprenticeship.

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

Colorado has issued Policy Guidance Letter WIOA-2015-07: Priority of Service for Title I Adult Programs that provides detailed guidance to local areas regarding implementation of Adult priority of services. This guidance includes definitions of the priority groups, identifies how veterans priority of service interfaces with adult priority of service, sets a minimum goal of adult enrollments meeting priority definitions, and requires local boards to create local policies that must include:

- Local procedures for determining priority during the eligibility process and enrollment;
- How the local area will define "low income" (it may be more stringent than the state definition in this PGL) and the relevant data used to establish the definition;
- What criteria and procedures will be used to assess priority for basic skills deficient individuals;
- Any local requirements, such as residency, that will be established in relation to the four priority groups;
- Any local discretionary priorities that will be established in addition to the four targeted groups, the data to support the need for the local priority, and the documentation that will be required from an individual for the local priority; and
- Local procedures for internal monitoring of the goal of Adult participants from the priority targeted groups.

The Colorado Department of Labor and Employment includes the Adult Priority of Service requirements into its annual compliance monitoring review of each local area within the state.

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

Colorado has implemented Policy Guidance Letter WIOA-2017-01: Transfer of Funds Between Adult and Dislocated Worker Allocations, which updates the maximum amount that can be

transferred and clarifies the approval process. This policy allows local areas to transfer up to 100% of funds, but different approval processes are required based on the total amount requesting to be transferred. Up to 50% may be transferred with Workforce Development Programs (WDP) staff approval; between 51 and 75% may be transferred with WDP and CWDC staff approval; and between 76 and 100% may be transferred only with the approval of the CWDC executive committee.

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]

Colorado is a local control state that, to the extent practicable, devolves policy-making authority to local boards. In the case of local grant awards for youth workforce investment activities, local boards have been directed to adhere to the requirements within WIOA, develop additional local requirements as appropriate, and utilize their local procurement policies to create detailed statements of work for incorporation in competitive requests for proposals (RFP) and the awards and contracts that result. Such RFPs, awards, and contracts are expected to set standards for achieving the WIOA Section 116 performance indicators, when organizations take on full sub-recipient responsibilities and require documentation of successful achievement of outcomes. These service providers are to be required to demonstrate past success in delivery of services and commit to successful outcomes for any contracted services. In all cases, the local boards are responsible for ensuring that all sub-recipients and contractors are monitored for quality of services and achievement of performance standards.

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.

Colorado has a long-established state youth council with membership that includes core and other required partners and that serves as an advocate for disconnected and other categories of high-risk youth served by the state's workforce system. Local workforce development boards may establish youth committees that incorporate the same strategies and objectives. At both the state and local levels these councils and committees will set policy and oversee efforts on the part of local areas to expand and enhance services to out-of-school youth, including the selection of youth services providers that demonstrate the capacity to ensure successful outcomes for this population. In addition, CDLE's State Youth Coordinator conducts regular meetings with youth services operators across all local areas to provide guidance, technical assistance, and promising practices regarding outreach and services impacting out-of-school participants. This long-standing workgroup has been expanded to include the participation of core and required partners to assist the dialogue among the local partners regarding access to services and the leveraging of resources across youth programs.

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]

Local boards and their youth committees in Colorado are expected to make all 14 youth program elements available within their one-stop centers through a competitive process established under local procurement policies that are as strict, or stricter, than federal procurement standards in the OMB Uniform Guidance. Local boards and their youth committees (as well as the state) will maintain a list of providers of these services, which case managers can utilize to ensure that youth participants have ready access to the services needed to successfully achieve the objectives of their individual service strategies. In addition, local boards and their youth committees will require that the local area administrator review the effectiveness of program element providers and provide data necessary to determine whether providers will remain on the youth element provider list.

Colorado submitted a waiver request to waive the competitive procurement requirement for three of the 14 youth program elements: work experiences, supportive services, and follow-up. Through a WIA waiver for these same elements, one-stop center staff has developed the expertise to deliver these services in-house and utilize the cost savings to provide additional services to the youth population. Note: The waiver became moot with the issuance of the WIOA final regulations, which do not require procurement of the youth program elements. Colorado is allowing local areas to determine whether procurement of these services should be pursued.

Colorado Policy Guidance Letter FIN-2016-02, Eligible Providers of WIOA Title I Youth Program Elements, provides guidance to Local Workforce Development Boards and Local Areas on the identification and selection process for providers of the 14 Title I Youth program elements to ensure compliance with federal requirements under WIOA. This policy defines pre-apprenticeship on p. 6 using the criteria for quality established in TEGL 21-16.

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.

Colorado is a local control state that, to the extent practicable, devolves policy making authority to local boards. The State policy for WIOA eligibility (PGL WIOA-2015-05) contains the following guidance for local boards to establish their definition of "requires additional assistance:"

NEEDS ASSISTANCE - An individual (including a youth with a disability) who requires additional assistance to complete an educational program or to secure and hold employment. Because the State has not chosen to issue a policy that defines "additional assistance" as relates to WIOA Youth program eligibility, each local area has the responsibility for determining its own definition of this eligibility category. A local policy must be developed that specifies what conditions must be met for a youth to require additional assistance and what documentation is needed to demonstrate this eligibility category.

CDLE has advised local workforce areas that a local board must establish such a policy in its local plan, if using this criterion. Our PY20-23 planning policy now includes the requirement for each local area to identify its "requires additional assistance" criteria. The State policy also

provides examples of appropriate documentation such as the WIOA application, the Individual Service Strategy, or case notes.

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.

he State policy for WIOA Eligibility (PGL WIOA-2015-05) contains the following definitions, which incorporate provisions of the state statute regarding compulsory school attendance, and guidance from the Colorado Department of Education:

OUT-OF-SCHOOL YOUTH, an individual is an out-of-school youth if they are:

1. Not attending any school (as defined under State law) - must meet one of the following:

    a. Colorado Department of Education Secondary Out-of-School Definition: Out-of-school means youth up through age 21, who are entitled to a free public education in the State but are not currently enrolled in a K-12 institution. This could include students who have dropped out of school, youth who are working on a high school equivalency outside of a K-12 institution, and youth who are "here-to-work" only.

    b. USDOL Post-Secondary Out-of-School Definition: To be considered out-of-school, a youth must not be registered for or attending any credit-bearing post-secondary classes, whether remedial or regular. A youth may be considered "out-of-school" if registered for or attending ONLY non-credit-bearing post-secondary classes. This definition applies upon registration for specific post-secondary classes, even if classes have not started.

    c. Additional Out-of-School Categories:

        i. Adult Basic Education: WIOA youth programs may consider a youth to be out-of-school youth for purposes of WIOA youth program eligibility if they are attending Adult Education provided under Title II of WIOA, YouthBuild, or Job Corps.

        ii. SWAP: Youth participating in the School to Work Alliance Program, who are no longer enrolled in secondary school, would be considered out-of-school. These individuals may have dropped out, aged out at 21, or obtained their diploma or certificate of completion.

        iii. GED, HiSET, or TASC Classes: Youth enrolled in GED, HiSET or TASC prep classes outside of the K-12 system would be considered out-of-school.

        iv. Dropout Reengagement Program: Youth enrolled in one of these programs would be considered out-of-school.

        v. Transition Program: Youth enrolled in a WIOA Title II Adult Education transition program would be considered out-of-school.

IN-SCHOOL YOUTH, an individual is an in-school youth if they are:

1. Attending school (as defined by State law) – must meet one of the following:

    a. Colorado Department of Education Secondary In-School Definition: Youth up through age 21, who are entitled to a free public education in the State and are currently enrolled in a K-12 institution, or meet one of the following exceptions to compulsory school attendance:

        i. Home-schooled (consisting of at least 172 hours of class time per year, averaging 4 hours per day, with course transcripts developed); or

        ii. Completing an on-line high school curriculum (consisting of at least 90 hours of class time per semester); or

        iii. Attending a private secondary school

2. USDOL Post-Secondary In-School Definition: Under the WIOA youth program eligibility requirements the term "school" refers to both secondary and post-secondary school. Therefore, an individual registered for or attending credit-bearing classes at a post-secondary school is considered an in-school youth. Such individual would be considered out-of-school if registered for or attending non-credit-bearing courses ONLY. This definition applies upon registration for post-secondary classes, even if classes have not started.

3. Attending an alternative education program: an individual attending an alternative education program is not considered to be a dropout and therefore is in-school.

4. Attending GED, HiSET, or TASC Classes offered by the K-12 system – such individual would be considered in-school

5. SWAP: Youth participating in the School to Work Alliance Program, who are still enrolled in secondary school, up to age 21, would be considered in-school.

6. Transition Programs: Youth that are in transition programs ("receiving 18-21 services") associated with the K-12 system are considered in-school. They are still obtaining Free Appropriate Public Education, until the age of 21, or until their exit prior to age 21.

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.

The State policy for WIOA Eligibility (PGL WIOA-2015-05) contains the following definition for basic skills deficient:

BASIC SKILLS DEFICIENT, is an individual:

1. Who is a youth, who has English reading, writing, or computing skills at or below the 8th grade level - no higher than 8.9 on a generally accepted standardized test; or

2. Who is a youth or adult, who 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. This may also include lack of computer literacy.

Note on Standardized Tests: When using formal assessment tests to determine basic skills deficient, local programs must use assessment instruments that are valid and appropriate for the target population, and must provide reasonable accommodation in the assessment process, if necessary, for individuals with disabilities. In addition, if a standardized test is used to assess basic skills, the test should include reading, writing, or computing skills. Lacking soft skills or specific skills needed for a particular job may not be used to assess otherwise high-functioning individuals as basic skills deficient. As a result, tests such as Prove-It are generally not appropriate for determining basic skills deficient or computer literacy as they are focused on occupational skills rather than basic skills.

Acceptable Documentation for Basic Skills Deficient:

___Standardized assessment test

___School records

___Case manager observation and case notes

___Adult Basic Education program referral or records

___Other_____

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).)

N/A

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

N/A

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

N/A

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.

N/A

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.

N/A

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.

N/A

E. WAIVER REQUESTS (OPTIONAL)

COLORADO WIOA WAIVER REQUEST 1

WAIVER OF THE OBLIGATION OF ELIGIBLE TRAINING PROVIDERS (ETPs) TO COLLECT AND REPORT ON THE PERFORMANCE DATA ON ALL PARTICIPANTS IN A TRAINING PROGRAM

1. Statutory/Regulatory Requirements to be waived: WIOA Sections 116 and 122, which require the collection and reporting of performance data on all students participating in training programs on the state's Eligible Training Provider List (ETPL).

Subsequent to the passage of WIOA in 2014, the state of Colorado immediately began working towards the implementation of the new ETPL provisions. At that time, CDLE was in the process of forging a new partnership with the Colorado Department of Higher Education to replace an outdated technology platform and build a new, robust ETPL. Since CDHE already receives student outcome data from colleges and other training providers around the state, CDLE determined that contracting with CDHE for both technology and outcome data analysis would create some efficiencies, including relieving the burden on training providers to provide their student data twice to different state agencies. This new online platform would provide enhanced features and accessibility to our shared customers.

We have been working diligently with CDHE and their vendor over the last few years and we have made significant progress. Prior to WIOA, Colorado was not collecting performance data on ETPs. A new data system has been built to house the training provider data, including the step-by-step approval process for WIOA funding eligibility. Two new websites have been developed and launched - a training provider site at ColoradoETPL.org and a consumer-facing site at cotrainingproviders.org.

However we have also encountered delays with our vendor in the development of the ETP application that will accept student information from providers. Multiple approaches to collecting the relevant student data were analyzed and a full rewrite of the proposed solution was initiated after the ETP discussions at the SMART training in March. We are fully reliant on this application to collect the non-WIOA participant data that will supplement the submission of WIOA participant data from the PIRL. Based on the current timelines with the vendor, we do not expect to have the application ready to accept data on all students (including non-WIOA funded students) until mid-2020 at the earliest. Without the technical application up and running, the collection of non-WIOA participant data is not possible.

In addition to the technical delays, providing data on all students is burdensome and time-intensive to the training providers and the state and local workforce staff, particularly when a small percentage of their overall students are WIOA participants. Most private occupational schools do not currently collect students' social security numbers, which are required for wage

matching. The reporting burden may result in a smaller number of training providers on the ETPL, therefore limiting consumer choice and accessibility, especially in rural parts of the state.

2. Actions the State has undertaken to remove State or local barriers:

N/A - There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

3. Programmatic outcomes resulting from the implementation of the waiver:

We anticipate that waiving the obligation of ETPs to collect performance data on all students will result in improved consumer choice, i.e. additional training providers on the ETPL. We have anecdotal evidence from smaller providers that it is burdensome to collect data on all students and they do not have the capacity to track this information, especially social security numbers. If this waiver is granted, we plan to track the number and type of providers before and after the waiver to demonstrate increased consumer choice. Therefore, the greater flexibility resulting from this waiver will result in:

- Increased numbers of training providers opting in to the ETPL
- Enhanced consumer choice for training programs
- Stronger partnerships between training providers and Colorado's public workforce system

4. Alignment with Department policy priorities:

This waiver request aligns with ETA's Strategic Objective 1.1 to "create customer-focused workforce solutions for American workers."

5. Individuals, groups, or populations affected by the waiver:

The waiver will benefit all WIOA participants accessing the ETPL by increasing the number of available training programs and enhancing consumer choice. The reduced reporting burden will also have a significant impact on training providers and state and local workforce staff.

Recent updates to Colorado's ETPL application now include a mechanism allowing providers to submit all student data. While the waiver is in place, Colorado plans to test this functionality while simultaneously working to increase the number and variety of providers available on the ETPL. Social security numbers provided for all students will be matched to UI wage data to calculate the following performance data for continued eligibility:

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 a recognized post-secondary credential, or a secondary school diploma or its recognized equivalent during participation in or within 1 year after exit from the program

6. How the State plans to:

a. Monitor the progress of waiver implementation:

CDLE has a long standing, comprehensive monitoring and performance accountability system that measures and evaluates results for job seekers and employers accessing Colorado's network of One-Stop centers. On a monthly and quarterly basis, CDLE reviews and analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition, State program monitors conduct quarterly reviews designed to assure that contract requirements are being met for all WIOA programs. On an annual basis, comprehensive compliance monitoring is conducted onsite. Should this waiver request be granted, CDLE will regularly monitor the outcomes and impacts of this waiver authority to ensure appropriateness and effectiveness.

b. Provide notice to any local board affected by the waiver:

If approved, CDLE will update state policy guidance to inform local boards of the change.

c-d.Provide any local board affected by the waiver an opportunity to comment on the request and ensure meaningful public comment, including comment by business and organized labor, on the waiver.

This waiver request was published for a period of 30 days on the public websites maintained by the Colorado Department of Labor and Employment and the Colorado Workforce Development Council, allowing for public comment on its content and potential impact. In addition, electronic copies of the waiver were sent via email to local boards and one-stop operators. No comments were received during this period.

e. Collect and report information about waiver outcomes in the State's WIOA Annual Report.

CDLE has a long standing, comprehensive monitoring and performance accountability system that measures and evaluates results for job seekers and employers accessing Colorado's network of One-Stop centers. On a monthly and quarterly basis, CDLE reviews and analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition, State program monitors conduct quarterly reviews designed to assure that contract requirements are being met for all WIOA programs. On an annual basis, comprehensive compliance monitoring is conducted onsite. Should this waiver request be granted, CDLE will regularly monitor the outcomes and impacts of this waiver authority to ensure appropriateness and effectiveness. Specifically we will track the number of providers on the list before and after the waiver is granted to assess increased consumer choice.

Should this waiver request be granted, CDLE will regularly monitor the outcomes and impacts of this waiver authority to ensure appropriateness and effectiveness and will report on the outcomes in the 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.

N/A – This is not a renewal of an existing waiver.

Colorado Response to ETA - February 2020:

The waiver request below was originally submitted in December 2018. ETA's response (dated March 13, 2019) stated "WIOA Section 189(i)(3)(A)(i) explicitly forbids the Secretary from waiving any statutory or regulatory requirements relating to the 'allocation of funds to local areas.' Therefore, a waiver of the WIOA Title I Adult and Youth formula methodology cannot be approved." Colorado respectfully re-submits this waiver request with further clarification. The waiver would allow Colorado to modify the definition of one factor in the formula methodology or add an additional factor as approved by the Governor and the State Workforce Development Council. Colorado would be in full compliance with the requirement for "allocation of funds to local areas," using the statutorily defined formula with one modification. We take issue with how the excess unemployment standard is defined, and we ask that our waiver request be reconsidered with this new lens.

COLORADO WIOA WAIVER REQUEST

PREPARED BY THE COLORADO DEPARTMENT OF LABOR AND EMPLOYMENT

September 2018 (Updated February 2020)

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.

WIOA Sections 128(b)(1), (2), and (3) and 133(b)(1)(A), (2)(A) and (3): Statutory formula methodology for the Title I Youth and Adult programs' within state allocations. Currently the WIOA statute requires states to use one of two formula options to distribute Title I Youth and Adult funds to local areas.

Note: This waiver request does not impact the requirement for the state to allocate funds to local areas; it is strictly to allow modification of the within state formula methodology, similar to the WIOA provision allowing modifications to the WIOA Title I Dislocated Worker within state formula.

The waiver, if granted, would allow Colorado to change the statutory formulas in one or more of the following ways, after consultation with the Governor, the state workforce development council, and various stakeholders:

- Modify the 4.5% excess unemployment standard to reflect current labor market conditions;
- Replace the excess unemployment factor with a different factor, for example, Census data related to groups with barriers to employment;
- Add a factor to the existing formulas, such as Census data related to groups with barriers to employment; or
- Apply the state's percentage cut, or increase, equally to all local areas.

Reasons why the waiver is being requested:

- The methodology for the within state formulas was originally developed 20 years ago under WIA and should be updated in accordance with current economic, structural and demographic shifts and trends.
- WIOA requires priority of service for a variety of groups with barriers to employment, who are not considered in the formula methodology.

- "Excess unemployment" is required for 1/3 of the youth and adult formula factors and it is also required in the alternative formulas.
- The standard for excess unemployment is 4.5%. However, the PY16 unemployment rates for seventeen of the states were below this level, with an additional fourteen states having an unemployment rate of 4.6 - 5%. In most cases these rates have gone down even further for PY18 and PY19.

Current Labor Statistics, Dec 2019

Location	Rate
Colorado	2.5%
U.S.	3.5%

- The impact within Colorado and other states is that some local areas end up having a Zero or close to Zero in the excess unemployment factor, thereby creating a reduction in funding greater than 10%, even with the 90% hold harmless calculation applied to the formula.
- As long as unemployment rates stay at historic lows in Colorado and other states, many local areas will be victims of this formula inequity, with major changes to their percent share of the total funding from year to year. Most recently the primary changes represented double digit decreases in funding, resulting in layoffs and reduction in services, thus destabilizing the system. In limited cases there were also double digit increases.
- Through the use of a modified Dislocated Worker formula, allowed by WIOA and approved by USDOL, Colorado has strategically allocated funding to the local areas where it can be best utilized. (Colorado added two factors: percent share of the previous program year's DW expenditures and percent share of DW customers served in the previous program year.) This precedent within the law should be applied to the Adult and Youth within-state formulas.

The following is the actual impact of the required formula upon the PY18 Youth funding, versus PY17 Youth funding, followed by the equivalent for the PY18 versus PY17 Adult funding:

WIOA YOUTH	PY17	PY18	Difference	% Change
Adams	$779,653	$745,711	-$33,942	-4.4%
Arapahoe	$935,230	$808,495	-$126,735	-13.6%
Boulder	$466,470	$407,368	-$59,102	-12.7%
Denver	$996,697	$853,434	-$143,264	-14.4%
El Paso	$1,393,526	$1,224,255	-$169,271	-12.1%
Jefferson	$622,650	$542,781	-$79,869	-12.8%
Larimer	$541,658	$567,855	$26,197	4.8%
Mesa	$529,652	$652,137	$122,485	23.1%
Rural	$1,651,422	$1,541,642	-$109,780	-6.6%

WIOA YOUTH	PY17	PY18	Difference	% Change
Weld	$595,038	$608,997	$13,959	2.3%
TOTAL	**$8,511,996**	**$7,952,674**	**-$559,322**	**-6.6%**

WIOA ADULT	PY17	PY18	Difference	% Change
Adams	$774,211	$716,952	-$57,259	-7.4%
Arapahoe	$924,242	$801,408	-$122,834	-13.3%
Boulder	$315,807	$253,036	-$62,771	-19.9%
Denver	$1,021,261	$871,715	-$149,546	-14.6%
El Paso	$1,325,037	$1,180,877	-$144,160	-10.9%
Jefferson	$587,310	$509,878	-$77,431	-13.2%
Larimer	$363,735	$390,253	$26,518	7.3%
Mesa	$495,328	$587,656	$92,328	18.6%
Rural	$1,608,196	$1,574,444	-$33,752	-2.1%
Weld	$478,290	$510,873	$32,583	6.8%
TOTAL	**$7,893,417**	**$7,397,094**	**-$496,324**	**-6.3%**

Note:

- Colorado's calculations were reviewed by the USDOL Dallas Regional Office and determined to be accurate.
- Colorado also calculated local allocations using the alternative youth and adult formulas, which resulted in even greater local disparities.

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

N/A - There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted

- The waiver is expected to minimize swings in local allocations, thus minimizing layoffs and other significant disruptions in the delivery of services within both the youth and adult programs.
- Financial stabilization of the local workforce system will allow local areas to focus resources on the long-term goals of:
    - Increasing the use of sector strategy initiatives

- Increasing the use of work-based learning opportunities, particularly apprenticeships
- Continuing progress toward serving 100% of customers with barriers to employment and moving individuals into living wage jobs

4. Describes how the waiver will align with the Department's policy priorities

- Expand regionally-focused sector partnerships that are championed by business and industry to drive career pathways and skill-based hiring
- Expand and implement a full spectrum of work-based learning opportunities, with an emphasis on the expansion of the number and types of apprenticeships
- Establish a customer-centric focus to increase access to and effectiveness of services for all customer groups with barriers to employment

This waiver request is closely aligned with the Department of Labor's priorities to strengthen and improve our nation's public workforce system and help get Americans into high-quality jobs and careers and help employers hire and retain skilled workers. We cannot stabilize our local system with these severe funding fluctuations.

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

- Out-of-school youth and in-school youth in all eligibility and barrier categories
- Priority of service adults, including veterans, low income, public assistance recipients, those who are basic skills deficient, the disabled, and other groups with barriers to employment
- Local boards seeking a stable workforce infrastructure that is poised to meet the long-term needs of their communities
- One-Stop Partners seeking to align their service delivery to youth and adults with the one-stop system and leverage resources to meet customer needs.

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.

CDLE has a long standing, comprehensive monitoring and performance accountability system that measures and evaluates results for job seekers and employers accessing Colorado's network of One-Stop centers. On a monthly and quarterly basis, CDLE reviews and analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition, State program monitors conduct quarterly reviews designed to assure that contract requirements are being met for all WIOA programs. On an annual basis, comprehensive compliance monitoring is conducted onsite utilizing outcome reports generated from CDLE's statewide databases. Should this waiver request be granted, CDLE will ensure regular review of WIOA programs and discretionary grants to monitor the outcomes and impacts of this waiver authority.

CDLE will utilize the following mechanisms to track and monitor the use of waivers in each local are:

- Regional and local plans
- Workplans and quarterly goals specific to the WIOA youth and adult formula programs
- Local policies
- Activity and performance reports available through state database systems

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.

There is no existing waiver.

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 local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	Yes
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	Yes

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

ADULT PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	79.6%	76.0%	79.6%	76.0%
Employment (Fourth Quarter After Exit)	72.6%	75.0%	72.6%	75.0%
Median Earnings (Second Quarter After Exit)	6,900	7,061	6,900	7,061
Credential Attainment Rate	60.0%	70.0%	60.0%	70.0%
Measurable Skill Gains	62.5%	62.5%	62.5%	62.5%
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.

DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	80.3%	76.4%	80.3%	76.4%
Employment (Fourth Quarter After Exit)	73.2%	76.9%	73.2%	76.9%
Median Earnings (Second Quarter After Exit)	8,440	9,000	8,440	9,000
Credential Attainment Rate	50.0%	67.0%	50.0%	67.0%
Measurable Skill Gains	58.6%	58.6%	58.6%	58.6%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	70.7%	67.0%	70.7%	67.0%
Employment (Fourth Quarter After Exit)	61.9%	71.0%	61.9%	71.0%
Median Earnings (Second Quarter After Exit)	3,954	3,954	3,954	3,954
Credential Attainment Rate	58.5%	63.0%	58.5%	63.0%
Measurable Skill Gains	58.8%	58.8%	58.8%	58.8%
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.

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.

Colorado is a Wagner-Peyser demonstration state that has used county and state merit staff for over 20 years to deliver Wagner-Peyser and MSFW outreach services. We have contracted for these services with county and state sub-recipients, but have not allowed further sub-contracting by the sub-recipients. Currently the State Monitor Advocate is a state merit system employee. Colorado does not anticipate changing this method of staffing or delivery of services for PY20.

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

Colorado has developed a comprehensive plan to address the professional development of Employment Service staff, as well as core program staff within the statewide system of one-stop centers. Major components of the plan will include:

- Access to the National Association of Workforce Development Professionals (NAWDP) workforce professional certification courses
- Annual Think Big Youth Forum, which provides workshops on services to youth customers for all workforce partners
- Monthly Workforce Forum Training Webinars covering a wide range of topics related to WIOA implementation and partner program requirements
- Annual Business Services Summit for business services representatives across the statewide one-stop system.

Additional ongoing training strategies have been implemented to address aspects of the law and regulations and to assist with the implementation of each state policy that is issued to support the transition to a comprehensive one-stop system under WIOA requirements.

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

CDLE's Workforce Development Programs (which administers the Title I and Title III WIOA core programs) and the Unemployment Insurance Division formalized their long-standing partnership in early 2012 with the co-location of Workforce Development representatives at the Unemployment Insurance offices to coordinate reemployment initiatives for claimants and the long-term unemployed. The two divisions work closely to strategically plan and support implementation of initiatives designed to benefit their shared customers. These initiatives have included the:

- Cross-training of approximately 120 UI staff on the roles of the workforce centers. UI is brainstorming with staff at all levels, from front-line to upper management, ways to better integrate reemployment philosophies into UI's everyday conversations and workload involving customers. Once all ideas are heard and analyzed, UI will develop a

plan to implement the approved concepts, which will include staff training and messaging to customers

- Cross-training of approximately 70 workforce center staff on the Unemployment Insurance benefits system and UI eligibility issues. CDLE holds annual UI eligibility refresher training for workforce center staff and answers any workforce staff questions as they arise.

The Reemployment Services and Eligibility Assessment (RESEA) initiative requires that UI staff participate in the development and training of the UI eligibility referral process for the workforce system. Annual training on RESEA is delivered, recorded and made available to the workforce system and other stakeholders on demand. In addition, the workforce system receives annual training on how and when to refer UI eligibility issues to the UI system. Lastly, CDLE developed a UI eligibility and work-search requirements video (in both Spanish and English). UI staff investigates and adjudicates eligibility referrals made by the workforce system. Additional technical assistance and follow-up sessions are made available, as appropriate.

- Joint issuance of state policies to the workforce system regarding reemployment services such as Links to Reemployment (UI Profiling) and approved training status
- Joint development of online resources targeted to the reemployment of UI customers

This system of cross-training and joint communications will be expanded to include the Title II Adult Education and Family Literacy and Title IV Vocational Rehabilitation core partners. Initial steps have been taken to include these partners in all aspects of cross-training and awareness initiatives, including UI eligibility issues.

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

Workforce representatives throughout the statewide network of workforce centers are trained to provide general assistance and information to customers who have questions about filing a claim for unemployment compensation. This includes assistance on general unemployment insurance questions. Questions that require specific UI expertise or that refer to a specific, individual claim are referred to UI for responses.

Colorado provides direct phone line access to a UI representative in 30 workforce center offices across the state (UI hot line). These phone lines bypass the main call center phone lines and expedite the resolution of any outstanding unemployment insurance questions. UI has developed a Call Back form that allows claimant customers to receive a contact back from a UI representative based on the most convenient time and method. Workforce representatives complete this for the claimant and provide details about the claimant's question in order for the UI representative to be prepared to assist this customer in a timely and effective manner. In addition, each workforce center has at least one computer in its resource room which provides access to the online UI Chat platform, which allows a workforce center customer to chat in real time with UI representatives about any UI concern.

Colorado strives to continually improve upon existing processes and will expand upon what is already in place to include more workforce center offices throughout the state. As the need for additional access increases, enhanced technology will be considered to meet the UI expertise access requirements of WIOA. The workforce system will continue to evaluate the triage

process for referring claimant customers to UI expertise to ensure that questions specific to an individual's claim are referred to UI.

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

In 2014, Colorado established a strategic plan for reemployment initiatives that outlines the state's direction for the year and future years, with the goal of reducing the average duration of weeks on unemployment compensation from 15.2 weeks to 12 weeks by June 2017. The plan contains components to analyze data, research state and national initiatives for integration, and enhance customer messaging, and it continually evolves due to fluctuating market conditions. In support of the plan:

- The statewide network of workforce centers provides reemployment services to all customers, including UI claimants. Reemployment services include basic labor exchange, orientations to workforce services, the provision of labor market resources and information, workshops, one-on-one services, and referrals to jobs.
- Colorado provides Worker Profiling and Reemployment Services via the Reemployment Services and Eligibility Assessment initiative for UI claimants. All workforce areas in Colorado administer the Reemployment Services and Eligibility Assessment program, and to date approximately 20,000 UI claimants have been selected to participate.
- UI partnership initiatives are established for STC, TAA, TRA, ATAA, and RTAA. This includes recruitment efforts for special populations, such as Veterans and long-term unemployed customers.

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:

Wagner Peyser funds support the basic labor exchange services and all career services that are made available to all workforce center customers, including UI claimants. Relevant information about a claimant's status, and the completion of reemployment activities is securely shared between the two agencies' databases through a file transfer process.

Colorado law requires claimants to register for work with the State employment service. Connecting Colorado job seekers complete a full registration with Connecting Colorado and record current contact information, work experience and educational credentials, along with skill sets that are most relevant to the work that is sought. Job seekers are required to update the unemployment insurance status fields. These fields alert the Division of Unemployment Insurance of a claimant's compliance to register for work with Connecting Colorado. Active claimants who are registered in the Connecting Colorado database are required to receive job and event notifications, along with other communications from the Connecting Colorado database and the assigned local workforce area. Initially, all intrastate claimants, who are not job-or union-attached, are assigned five work search activities per week. Workforce Center representatives review the work registration status and determine the appropriate number of work search activities that must be made each week, based on the local labor market and the customer's specific skill sets. A claimant who does not register in Connecting Colorado within four weeks of filing a claim will stop receiving any eligible unemployment benefit payments until the eligibility issue is resolved.

UI claimant customers must register or reactivate their registration with the state's online labor exchange system, called Connecting Colorado, unless they have been excused from registration

due to a job attachment or participation in approved training. The administration of the work test generally occurs during the registration process or through mandated claimant orientations or appointments. Workforce center representatives have been trained on basic UI eligibility requirements and how to identify and refer "Able and Available" or A&A issues to UI merit staff. To strengthen the partnership between UI and the workforce system, training on identifying and referring A&A issues to UI is readily available to the statewide network of workforce centers. Customers have access to job openings and job placement services both online and in-person. Workforce representatives are available to assist with in-person referrals and recommendations on work-search strategies.

During workforce center orientations, customers receive information regarding workforce services, programs and partner resources. This includes information about internal and external training and educational programs, including referrals to WIOA. Customers have access to resources and handouts. Online, customers may research information about different training programs within their community, statewide, and nationally. Workforce center representatives provide individualized information and resources that assist the customer in making the most informed choice.

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.

The Agricultural Outreach Plan sets policies, and objectives in providing W-P services to the agricultural community, specifically Migrant and Seasonal Farm Workers (MSFWs). The Colorado Department of Labor & Employment (CDLE) provides these services through the One-Stop Career Center system to ensure that MSFWs receive the full range of employment, training, and educational services on a basis which is qualitatively equivalent and quantitatively proportionate to the services provided to non-MSFWs. This Ag Plan presents the following information:

- Assessment of need: An assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State to include employment, training, and housing. A review of the resources available and their effectiveness is included.
- Outreach activities: A description of the ways the State will ensure that MSFWs have equal access to employment opportunities. A description of the State's proposed outreach activities including strategies on how to contact farmworkers who are not being reached by the normal intake activities conducted by the employment service offices to include numerical goals and amount of full time staff.
- Services provided to MSFWs through the One-Stop Delivery System: A description of the ways the State will ensure that MSFWs have equal access to employment opportunities. Coordinating outreach efforts with WIOA Title I section 167 grantees and

other public and private community service agencies and MSFW groups. These outreach activities will include the explanation of services available at the one-stop centers, explanation of their basic rights and the marketing of the employment services complaint system.

- Services provided to agricultural employers through the One-Stop Delivery System: A description of how the State will promote and provide labor exchange services and identify agricultural employers expected to employ MSFWs.
- Review and comments from key stakeholders

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

Assessment of Need:

The charts below, which are divided by region, address the following plan requirements:

1. Review of the previous year's agricultural activity in the state.
2. Review of the previous year's MSFW activity in the state.
3. Projected level of agricultural labor employed in each of the crops identified. Estimate of the number of MSFWs involved in each, and indication of crop areas that experienced labor shortages.
4. Projected level of agricultural activity expected in the state in the coming years, including any changes from last year's crop activities.
5. Projected number of MSFWs in the state in the coming years, including any changes in number of MSFWs involved in each crop activity.

The Colorado Agricultural Statistics 2017 report was used to obtain the data for each area in Colorado. Some employer interviews were obtained for data on smaller crops; however, while interviewing employers, some stated that they reduced their acreages or plan to use the same amount due to labor costs, supply costs, land and water shortages.

Northern Colorado (Brighton and Greeley)

Review of 2019 Agricultural Activity

Crop	Onions	Beans	Sugar Beets	Carrots	Potatoes	Lettuce	Cabbage	Spinach	Broccoli	Corn Sweet Corn, Silage, Grain
Acreage	8,500	18,000	11,200	1,200	800	710	1,060	165	150	245,000
Labor										

Crop	Onions	Beans	Sugar Beets	Carrots	Potatoes	Lettuce	Cabbage	Spinach	Broccoli	Corn Sweet Corn, Silage, Grain
Pre-harvest	200	100	100	30	0	150	150	40	20	60
Harvest	900	50	50	100	100	330	300	160	60	300
Months of Heavy Activity	Mar–Nov	Aug-Sep	May-Oct	Aug–Sep	Aug–Sep	Mar-Oct	Mar-Nov	June	Apr-Nov	July-Sep

Total Agricultural Job Openings Received (including H2A) = 305

Review of 2019 MSFW Activity

Crop	Onions	Beans	Sugar Beets	Carrots	Potatoes	Lettuce	Cabbage	Spinach	Broccoli	Corn Sweet Corn, Silage, Grain
Labor Estimate	1,100	100	100	130	100	730	950	145	80	520
MSFWs Involved	850	50	50	85	60	200	280	80	60	340
Labor Shortages	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No

Est. Local Seasonal Population: 850

MSFWs Registered: 250

	HIGH	LOW
Migrant Worker Influx	700	200
Est. MSFWs in the Area	1,500	800

Projected Level of Agricultural Activity for 2020-2024

Crop	Onions	Beans	Sugar Beets	Carrots	Potatoes	Lettuce	Cabbage	Spinach	Broccoli	Sweet Corn, Silage, Grain
Acreage	2,0000	18,000	11,600	1,400	800	800	1100	140	150	260,000
Labor Needs	930	100	100	100	100	350	425	70	40	830

Projected Agricultural Openings = 700 per year
Projected Number of MSFWs in the Area = 1,600 per year

No changes are anticipated for traditional agriculture productivity in 2020. However, the current farm bill acknowledges Hemp as a farm commodity, and the number of hemp crops

planted in these regions is expected to grow rapidly as a result. Colorado Hemp acreage has already doubled since the farm bill went into effect. No major changes are anticipated in agriculture productivity for northern Colorado for the next four years. Major crops, with the exception of sugar beets and corn, are expected to be planted and harvested using hand labor. Area crew leaders will handle most of the hand labor work for this area, and H2A workers will be utilized when U.S. Workers are not found. During interviews with seasonal growers in the northern Colorado area, they stated that crop production will remain the same barring unforeseen events.

Arkansas Valley (Lamar and Rocky Ford)

Review of 2019 Agricultural Activity

Crop	Onions	Melons
Acreage	500	1400
Labor Used		
Pre-harvest	180	200
Harvest	300	300
Months of Heavy Activity	Apr-Sep	Jun-Sep

Total Agricultural Job Openings Received = 100

Review of 2019 MSFW Activity

Crop	Onions	Melons
Labor Estimate	630	315
MSFWs Involved	400	175
Labor Shortage	YES	YES

Est. Local Seasonal Population: 300
MSFWs Registered: 95

	HIGH	LOW
Migrant Worker Influx	420	33
Est. MSFWs in Area	500	N/A

Projected Level of Agricultural Activity for 2020-2024

Crop	Onions	Melons	Mixed Vegetables
Acreage	150	1500	130
Labor Needs	50	365	50

Projected Agricultural Openings = 200
Projected Number of MSFWs in the Area = 400

Pueblo County

Review of 2019 Agricultural Activity

Crop	Onions	Melons	Pumpkin	Chili
Acreage	150	800	710	150
Labor Used				
Preharvest		160	160	60
Harvest	80	300	160	20
Months of Heavy Activity	Apr-Sep	Jun-Sep	Jun-Oct	Jul-Sep

Total Agricultural Job Openings Received = 200

San Luis Valley (Monte Vista)

Review of 2019 Agricultural Activity

Crop	Potatoes	Lettuce	Spinach	Carrots	Beets
Acreage	53,000	1,400	150	300	205
Labor Used					
Pre-harvest	100	150	5	10	20
Harvest	500	250	15	50	30
Months of Heavy Activity	Sep-Oct	Jul-Sep	May-Oct	Aug-Sep	Aug-Sep

Total Agricultural Job Openings Received = 300

Review of 2019 MSFW Activity

Crop	Potatoes	Lettuce	Spinach	Carrots	Beets
Labor Estimate	2,900	1,400	300	300	200
MSFWs Involved	850	400	20	50	20
Labor Shortages	No	No	No	No	No

Est. Local Seasonal Population: 1,800

MSFWs Registered: 543

	HIGH	LOW
Migrant Worker Influx	1,800	300
Estimated MSFWs in Area	1,800	N/A

Projected Level of Agricultural Activity for 2020-2024

Crop	Potatoes	Lettuce	Spinach	Carrots	Beets
Acreage	51,000	1,500	250	300	200
Labor Needs	600	400	60	60	20

Projected Agricultural Openings = 520

Projected Number of MSFWs in the Area = 1,200

No changes are anticipated for traditional agriculture productivity in the South East and South Central Colorado regions in 2020. We anticipate that in both regions a significant amount of Ag activity for PY20 year will be in the Hemp industry because hemp acreages in these areas have substantially increased.

Western Colorado (Delta)

Review of 2019 Agricultural Activity

Crop	Onions	Corn (Sweet)	Cherries (Sweet)	Cherries (Tart)	Peaches	Apples	Hemp
Acreage	483	11,151	240	280	550	3,400	1,632
Labor							
Pre-harvest	145	155	0	0	100	100	N/A
Harvest	175	175	100	50	50	50	N/A
Months of Heavy Activity	Jul-Oct	Jul-Sep	July	Jul-Aug	July-Aug	Sep-Oct	Jun-Oct

Total Agricultural Job Openings Received = 65
Review of 2019 MSFW Activity

Crop	Onions	Corn (Sweet)	Cherries (Sweet)	Cherries (Tart)	Peaches	Apples	Hemp
Labor Estimate	320	281	25	35	235	150	N/A
MSFWs Involved	40	40	25	35	55	50	N/A
Labor Shortages	Yes	Yes	Yes	Yes	Yes	Yes	N/A

Estimated Local Seasonal Population: 60
MSFWs Registered: 100

	HIGH	LOW
Migrant Worker Influx	20	0
Estimated MSFWs in Area	100	N/A

Projected Level of Agricultural Activity for 2020-2024

Crop	Onions	Corn (Sweet)	Cherries (Sweet)	Cherries (Tart)	Peaches	Apples
Acreage	500	12,000	240	280	550	3,400
Labor Estimate	320	300	25	35	250	200

Projected Agricultural Openings = 65
Projected Number of MSFWs in the Area = 600

Colorado continues to ranks 1st in the nation in the production of proso millet, which is used mostly in bird feed, but is also used in health food, due to the lack of gluten. Proso millet is popular because it has a short growing season and needs little water.

Colorado ranks 2nd in the nation for sheep production for 2019, with approximately 420,000 head of sheep.

One of Colorado's largest crops is potatoes. Colorado ranks 6th in potato production. Projected acres for the 2020 planting season will remain stable.

2) Employers in Colorado cite a need for affordable farmworker housing and the availability of more workers that are skilled, willing and able to do farm work.

3) Factors affecting agriculture in Colorado are water shortages and low unemployment rate. Because of this it is difficult to find local, migrant and seasonal workers that are willing to work in the harvesting and packaging of fruits and vegetables.

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

Colorado has migrant coalitions throughout the state where outreach workers can collaborate and learn about the services available to the MSFWs. The monthly meetings make it easier to coordinate services and learn what is available in different regions and times of the growing season. The Colorado Migrant and Rural Coalition (State Coalition) has members that include the NFJP 167 program, Migrant Head Start, Migrant Education, Colorado Legal Services, Catholic Charities, Food Banks, Migrant Health, Colorado Department of Agriculture, Environmental Protection Agency, Civil Rights, Workforce Centers, Farm Labor Housing and other agencies.

Colorado's most needed resource continues to be affordable housing for farmworkers. Like most states, farmworkers have a difficult time obtaining affordable housing that doesn't require a long term lease. Community Resources & Housing Development Corporation is looking to build farmworker housing in the Adams County area. This project is in its initial planning stage.

Colorado farmworkers are predominantly from Mexico with a few coming from Guatemala and El Salvador. Some of our migrant workers come into Colorado from Texas, Arizona and New Mexico; with nationality varying from the countries previously mentioned. A few of our workers also include U.S. Citizens. The primary language spoken among our farmworkers is Spanish, with some indigenous languages and a small population of Karin speaking refugees working on the Western Slope.

The number of MSFWs in Colorado varies during our peak season depending on crops and weather; we typically average between 4,000 to 5,000 MSFWs in the state. This includes approximately 2,400 seasonal workers. The other workers represent a combination of migrant workers from other states and H2A foreign workers on temporary visas.

Colorado has a close working relationship with our 167 grantee partner Rocky Mountain SER. They are always included in our information gathering process, along with our other partner agencies, such as Migrant Education and Migrant Head Start, to name a few.

4. OUTREACH ACTIVITIES

During PY20-PY24 the six significant workforce offices (Brighton, Delta, Greeley, La Junta, Lamar, and Monte Vista) will continue to provide quality employment services and referrals to

appropriate agencies for assistance to the MSFW population. The Colorado Department of Labor and Employment (CDLE) is required to administer an outreach program with bilingual (i.e. English/Spanish) staff because Colorado is designated as a significant MSFW state, with a predominantly Spanish-speaking MSFW population. CDLE entered into a statewide Memorandum of Understanding (MOU) with Rocky Mountain Service Employment Redevelopment (RMSER) (167 grantee) and Migrant Education for inter-agency referrals and data sharing. These MOUs have established and demonstrated effective coordination of outreach and increased registration activities for all service providers. Colorado's workforce development system is State administered and locally controlled. The contracts with each region will contain provisions to ensure that MSFWs receive the full range of employment and training services offered to the general public. CDLE will continue to provide technical assistance to the workforce regions in their planning activities in order to ensure the needs of MSFWs are addressed. Our technical assistance also ensures that the workforce development system is in full compliance with the Judge Richey court order and federal rules and regulations. Colorado's strategies to identify the number of MSFWs the State anticipates to reach via outreach includes the following:

- Each of the six significant offices is required to address outreach in their specific area plan. Planning requirements have been detailed in a Policy Guidance Letter (PGL WP-2009-01) available for review at: https://www.colorado.gov/pacific/sites/default/files/PGL-WP-2009-01_Annual-Outreach-Plan.pdf

The local outreach plans allow the State Monitor Advocate to monitor planned activities for the six significant offices and address unique issues around the state.

- Colorado identifies ways to increase the MSFWs' ability to access career services in the One-Stop centers by partnering with other agencies that also target the same population. Some of the partner agencies include: RMSER 167 provider, Migrant Education, the local migrant health clinics, faith- based migrant community associations and Colorado Legal Services.

- The State Monitor Advocate regularly attends the migrant coalitions in the following cities: La Junta, Monte Vista, Greeley, Denver, Pueblo, and Delta. In these meetings the State Monitor Advocate routinely explains how other agencies can partner with the Colorado Department of Labor and Employment to have migrants access the services offered by the six significant One-Stop centers including adult and dislocated workers. The outreach workers in each of these areas are active members of their migrant coalitions and, in most cases, hold elected office positions.

In accordance with regulations, MSFW outreach efforts will be accomplished by personal contacts with MSFWs, employers and other agency staff; conducting public meetings; and distributing pamphlets and other relevant printed materials. MSFW outreach workers will maintain records of their outreach efforts in a log of daily outreach activities. Reports will be submitted monthly to the State Monitor Advocate during periods of peak agricultural activity.

MSFW outreach staff will undertake a special effort to provide agricultural employers with pertinent information regarding the procedures for the intra/interstate recruitment of temporary agricultural workers. All six significant offices in the state of Colorado employ Outreach Workers who are bilingual and have a migrant background or experience working with the migrant farmworker population.

In accordance with regulations, MSFW outreach efforts will be accomplished by personal contacts with MSFWs, employers and other agency staff; conducting public meetings; and distributing pamphlets and other relevant printed materials. MSFW outreach workers will maintain records of their outreach efforts in a log of daily outreach activities. Reports will be submitted monthly to the State Monitor Advocate during periods of peak agricultural activity.

New outreach workers receive intensive training that includes Wagner-Peyser requirements, complaints, and services to MSFWs. Training also includes a basic summary of farmworker rights, and indications of possible sexual harassment and labor trafficking. Training continues with information on services that should be provided such as: availability of referrals to jobs and to training, supportive services, career guidance, and reporting requirements. All outreach workers receive at a minimum two annual training sessions, once in the spring and again in the fall. Local areas can also request technical assistance as needed, or the State office will provide technical assistance if monitoring visits show a specific need.

CDLE's Workforce Development Programs (which administers the Title I and Title III WIOA core programs) and the Unemployment Insurance Division formalized their long-standing partnership in early 2012 with the co-location of Workforce Development representatives at the Unemployment Insurance offices to coordinate reemployment initiatives for claimants and the long-term unemployed. The two divisions work closely to strategically plan and support implementation of initiatives designed to benefit their shared customers. These initiatives have included the:

- Cross-training of approximately 120 UI staff on the roles of the workforce centers. UI is brainstorming with staff at all levels, from front-line to upper management, ways to better integrate reemployment philosophies into UI's everyday conversations and workload involving customers. Once all ideas are heard and analyzed, UI will develop a plan to implement the approved concepts, which will include staff training and messaging to customers

- Cross-training of approximately 70 workforce center staff on the Unemployment Insurance benefits system and UI eligibility issues. CDLE holds annual UI eligibility refresher training for workforce center staff and answers any workforce staff questions as they arise.

The Reemployment Services and Eligibility Assessment (RESEA) initiative requires that UI staff participate in the development and training of the UI eligibility referral process for the workforce system. Annual training on RESEA is delivered, recorded and made available to the workforce system and other stakeholders on demand. In addition, the workforce system receives annual training on how and when to refer UI eligibility issues to the UI system. Lastly, CDLE developed a UI eligibility and work-search requirements video (in both Spanish and English). UI staff investigates and adjudicates eligibility referrals made by the workforce system. Additional technical assistance and follow-up sessions are made available, as appropriate.

- Joint issuance of state policies to the workforce system regarding reemployment services such as Links to Reemployment (UI Profiling) and approved training status

- Joint development of online resources targeted to the reemployment of UI customers

This system of cross-training and joint communications will be expanded to include the Title II Adult Education and Family Literacy and Title IV Vocational Rehabilitation core partners. Initial steps have been taken to include these partners in all aspects of cross-training and awareness initiatives, including UI eligibility issues.

Outreach workers in Colorado receive training on Unemployment Insurance requirements. They are kept up to date on job search requirements, job attached status and can also assist workers in changing or obtaining a pin number to access their claim.

Colorado has developed a plan to address the professional development of State merit staff, as well as core program staff within the statewide system of one-stop centers. Major components of the plan will include:

- Access to the National Association of Workforce Development Professionals (NAWDP) workforce professional certification courses
- Annual Think Big Youth Forum, which provides workshops on services to youth customers for all workforce partners
- Monthly Workforce Forum Training Webinars covering a wide range of topics related to WIOA implementation and partner program requirements
- Annual Business Services Summit for business services representatives across the statewide one-stop system.

Additional ongoing training strategies have been implemented to address aspects of the law and regulations and to assist with the implementation of each state policy that is issued to support the transition to a comprehensive one-stop system under WIOA requirements.

Colorado outreach staff is composed of 66% State merit and 33% local county workers. All staff are hired with the same skill set as State merit staff. Outreach staff receive the same training as state merit staff and are held to the same quality of service.

1. Colorado continues to employ six bi-lingual/bi-cultural outreach workers in Brighton, Greeley, Lamar, Delta, Monte Vista and La Junta. Colorado continues to employ outreach workers full time during the peak season as mandated by 20 CFR Part 653.107 (a) (4).
2. The number of staff positions assigned to outreach activities is 6 FTE and will continue to be the same as in prior years with no reductions.
3. Colorado continues to share a cooperative agreement with Colorado's 167 provider RMSER. All six significant offices conduct collaboration meetings with RMSER in order to meet the needs of our MSFW clients. Colorado has migrant coalitions in the following cities/towns: Denver, Greeley, Delta, Pueblo, La Junta, and Monte Vista. The State Monitor Advocate attends migrant coalition meetings on a regular basis, and our outreach workers have identified ways to partner with members of the coalition in order to serve the needs of our MSFW population. Partners who attend coalition meetings on a regular basis are 167 providers Board of Cooperative Educational Services (BOCES), RMSER, migrant education representatives, migrant housing representatives, food bank representatives and various other representatives from the non-profit sector.
4. In the six significant offices, non-MSFW outreach staff has been cross-trained on how to take Employment Services (ES) related complaints. A policy guidance letter **(PGL ADM-2017-01)** has been issued covering all ES complaint requirements and procedures. Each Workforce center prominently displays complaint posters and complaint fliers for customer's ease of information and also provides information about the complaint system during outreach contacts. The complete document is available on-

line for review at: https://www.colorado.gov/pacific/sites/default/files/PGL-ADM-2017-01_ES-Complaint-System.pdf

5. The following agencies also employ MSFW outreach workers in the state of Colorado: RMSER (167 provider), Migrant Education Board of Cooperative Educational Services (BOCES), RMSER Migrant Head Start and also migrant health providers. The state of Colorado's MSFW outreach workers routinely conduct co-outreach with this staff. Additionally, Plaza del Sol and Plaza Milagro in Greeley routinely conduct a migrant information evening share MSFW services providers set up a tent and inform the MSFW agencies about their programs and requirements and also provide information to the immigrants that are in attendance.

   Each of the six significant offices has customized handouts describing the services offered by the Workforce Centers. These handouts are shared with other migrant outreach workers in other organizations for them to give to their clients. The migrant coalitions in Greeley, Monte Vista, and La Junta routinely have a migrant appreciation picnic at the end of the season.

   At these picnics the members of the coalitions join forces to work with one another to meet the needs of the MSFW population. The Executive Director of CDLE routinely attends at least one of the picnics to personally thank the farm workers for their hard work in helping to feed America. The Delta area holds annual health fairs for the farmworker community.

6. Colorado recognizes the importance of targeting the non-agricultural employers through outreach efforts. Colorado formed a Limited English Proficiency (LEP) taskforce, Colorado Workforce Speaks. The Colorado State Monitor Advocate is also the LEP Coordinator. There are several non-agricultural employers who participate in this effort. These employers use the services of the Colorado Workforce Centers in order to access LEP clients, and it has created a "Win/Win" situation for the employers and the clients of the workforce center. Colorado's E-Colorado website https://e-colorado.coworkforce.com/ has team rooms that are specific to programs that include a Colorado Workforce Speaks team room. In this team room, workforce staff can access needed language resources, documents, reports, and flyers.

7. The state of Colorado continues to promote labor exchange services to the agricultural employers by participating in agricultural conferences. The State Monitor Advocate maintains a very close working relationship with the Colorado Department of Agriculture. This close working relationship allows the State to be in touch with the latest trends and current employer needs. All Colorado outreach workers and other workforce staff have been trained and certified in pesticide safety. This training is another tool outreach workers can use in providing pesticide safety information to both the worker and the employer.

   This free service for agricultural employers is used as a marketing tool by providing the service and then reminding the employer about the labor exchange services offered by the One-Stop centers. Outreach Workers are trained to inform the employers of the benefits and the requirement to recruit US workers when they are equally qualified for the positions announced in an H2A application. The Monitor Advocate is also active in the Colorado Fruit and Vegetable Growers Association (CFVGA) and encourages outreach workers to attend CFVGA meetings.

8. Colorado will continue to utilize annual growers' meetings as a vehicle to identify agricultural employers expected to hire MSFWs. The growers' meetings are held annually in different parts of the state. The 2020 growers' meetings will provide information to growers about law changes related to housing, pesticide protection and H2A regulations. The Agricultural recruitment system will continue to be a resource to bring migrant workers to the state of Colorado.

   A very close working relationship with the State Monitor Advocates from the states of Texas and New Mexico (Colorado's labor supply states) will continue to be essential to ensure equal opportunity for U.S. migrants for Colorado jobs. Colorado is also developing a working relationship with hemp employers because of the large increase in hemp acreages.

The below chart indicates the number of MSFWs to be contacted during the program year by workforce center staff, and the number of staff days (based on eight hour days) to be utilized for outreach, listed by local office where outreach staff is assigned, as well as state office:

Local Office	Outreach Contacts	Staff Days
Brighton	700	60
Delta	150	60
Greeley	500	60
Lamar/Rocky Ford	200	120
Monte Vista	150	60
TOTAL	1,700	360

The number of MSFW anticipated registrants is 700.

Agricultural employers will be contacted by outreach staff to obtain job orders, conduct job development, and provide assistance with the state's electronic system. It is estimated that the state of Colorado will contact a total of 100 agricultural employers, as many of the agricultural employers routinely list job postings with the six significant offices, and these employers utilize our services year after year.

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

1. MSFW outreach functions will be carried out by 6.0 FTE during PY20-PY24, with occasional backup from bilingual staff in the significant offices with multiple bilingual staff. Workforce center staff will utilize approximately 360 staff days to provide MSFW outreach services to the farm worker community. Career services required under WIOA Title I will be provided to the MSFW clients via the six bilingual MSFW Outreach workers employed in the six significant offices in Colorado. Colorado has an MSFW registration system referred to as Connecting Colorado. This system captures the data of Migrant and Seasonal Farm Workers electronically, including an explanation of how they qualify as a MSFW on the notes screen.

   This system is shared by all Colorado Workforce Centers, including the six significant offices. The MSFW outreach workers and workforce staff routinely inform Migrants of advancement opportunities to improve their skills to be competitive in a

local, regional and global economy. For example, each significant office hands out an MSFW packet to migrants during outreach activities. These informational packets include resources for English as a Second Language (ESL), Migrant Assistance Program (MAP) and training opportunities available through the WIOA 167 provider as well as the regular WIOA program.

2. CDLE and RMSER, the WIOA 167 grantee, have had an MOU in place since 1995, and the updated MOU with new WIOA requirements was signed in March 2019. This MOU includes, but is not limited to, co-location and collaboration in communities where both agencies have a presence. It also ensures that the needs of MSFWs who do not have access to the One Stop Centers are met. CDLE also entered an interagency cooperative agreement with Migrant Education in all six significant office areas. This interagency cooperative agreement establishes and demonstrates effective coordination of outreach, and increases registration activities for all service providers. The interagency agreement will be expanded to include all offices statewide. These cooperative ventures between CDLE, RMSER, and Migrant Education have generally improved the operational knowledge of outreach staff, and reinforced principles and strategies. This successful partnership provides a vehicle to better serve and to immediately expand the range of available services to the MSFW population.

Services Provided To Agricultural Employers Through The One-Stop Delivery System

1. The Migrant and Seasonal Farm Worker Program is designed to enhance and expand services to meet the needs of the agricultural industry. Colorado will provide services to agricultural employers by effectively providing information about services available through the workforce development system and, at the same time, obtain sufficient information about the employer's needs to provide appropriate services. Outreach workers will continue to conduct meetings with large growers and farm labor contractors to facilitate the exchange of information and maximize the effectiveness of the program. Staff will promote the use of the workforce centers to recruit workers by helping employers assess their labor needs and making appropriate referrals to their job openings.

2. Services to agricultural employers will be provided by MSFW outreach workers and other workforce center staff through daily planned personal visits and promotional telephone contacts with the employer.

3. CDLE continues to conduct pre-occupancy housing inspections to growers who provide housing to MSFWs, or nonimmigrant aliens admitted to the United States under the H-2A Temporary Labor Certification program.

   Colorado continues to experience a shortage of workers to tend to the crops. H2A application numbers have remained about the same for the last two years, with the Adverse Effect Wage Rate (AEWR) changing on a yearly basis.

4. Outreach workers are expected to develop and maintain productive relationships with agricultural employers. Agricultural employers can be identified in several ways: knowledge of the local labor market, incoming job orders, employer associations, and through word-of-mouth. Colorado will continue to utilize existing processes for linking available MSFWs with employers, including ongoing collaborative efforts by workforce centers and local community-based organizations that provide services to MSFWs.

5. Each workforce region with an MSFW significant office will continue to actively promote all aspects of labor exchange services available to agricultural employers. This will include attending and participating in employer association, farm labor contractor, and MSFW sponsored meetings and conferences.
6. State and local workforce center staff will provide information on local labor market conditions, and intrastate and interstate temporary agricultural worker recruitment requirements (including information on the Alien Labor Certification process). Information will also be provided on the Migrant and Seasonal Agricultural Worker Protection Act (MSPA) and how it affects agricultural employers, migratory workers and new hemp employers.

Marketing of the ES Complaint System is mentioned in section B. Proposed Outreach Activities under number 4. "Each Workforce center prominently displays complaint posters and complaint fliers for customer's ease of information and also provides information about the complaint system during outreach contacts."

The state of Colorado continues to promote labor exchange services to the agricultural employers by participating in agricultural conferences. The State Monitor Advocate a very close working relationship with the Colorado Department of Agriculture. This close working relationship allows the State to be in touch with the latest trends and current employer needs. All Colorado outreach workers and other workforce staff have been trained and certified in pesticide safety. This training is another tool outreach workers can use in providing pesticide safety information to both the worker and the employer.

This free service for agricultural employers is used as a marketing tool by providing the service and then reminding the employer about the labor exchange services offered by the One-Stop centers. Outreach Workers are trained to inform the employers of the benefits and the requirement to recruit US workers when they are equally qualified for the positions announced in an H2A application. The Monitor Advocate is also active in the Colorado Fruit and Vegetable Growers Association (CFVGA) and encourages outreach workers to attend CFVGA meetings.

6. OTHER REQUIREMENTS

A. COLLABORATION

Monitor Advocate:

The State Monitor Advocate wrote and commented on the four year Agricultural Outreach Plan.

Collaboration Methods:

Colorado uses a variety of methods to collaborate with the agencies who serve our MSFW population. We use monthly coalition meetings, joint outreach with agencies such as Rocky Mountain SER (NFJP 167), Migrant Education, Health, and other agencies. Our outreach workers serve either as an officer or active member in the local coalitions. The State Monitor Advocate (SMA) serves as the Chair of the Colorado Migrant and Rural Coalition. The years ago we organized and sponsored a yearly collaboration conference called The Colorado Agriculture and Labor Summit. This innovative partnership also collaborates with our Fruit and Vegetable Growers Association. We treat our growers as customers and their feedback is invaluable. To help us create a seamless process for our MSFW's, we have MOU's in place with our 167 provider, Rocky Mountain SER and Migrant education. This allows for data sharing and joint

enrollments. Our SMA routinely speaks at training conferences and staff meetings for our partner agencies. Topics covered on a regular basis include but are not limited to the complaint system and an overview of the services provided by our local American Job Centers. We are constantly looking for new ways and opportunities to collaborate in order to provide the best services to our MSFW population.

Affirmative Action Plans (AAP):

States with designated significant affirmative action local offices are required to submit an AAP in accordance with 20 CFR 653.111.

Colorado is not representative of the top 20% of MSFW activity nationally and therefore is not in the Affirmative Action category. Colorado is also not required to have an Affirmative Action plan for significant MSFW offices.

There is no imbalance in the racial or ethnic group on the six significant local offices. Each of Colorado's six significant offices employs Outreach staff who is bilingual and bicultural reflecting the needs of the Spanish speaking MSFW population in the state of Colorado.

Colorado has initiated a plan to meet the needs of any potential Non-Spanish speaking MSFW population. To view this comprehensive plan, please go to https://e-colorado.coworkforce.com/ then go to the team room named Colorado Workforce Speaks. Colorado has prepared a plan to meet the needs of the non-Spanish speaking MSFW; however, the dominant language of the MSFW population in the state of Colorado continues to be Spanish.

B. REVIEW AND PUBLIC COMMENT

The public comment period was completed on February 21, 2020. Only one comment was received that was related to the MSFW program. Here is the comment and the state's response:

- Comment: 167 is a section of MSFW, unsure why it is referenced as WIOA 167 provider. ("These informational packets include resources for English as a Second Language (ESL), Migrant Education Program (MEP) and training opportunities available through the WIOA 167 provider.")
- Response: Thank you for your comment. In Colorado section 167 of WIOA specific funding for Migrant Seasonal Farmworker Program is contracted out to Rocky Mountain SER; they are Colorado's National Farmworker Jobs Program (NFJP) contractor. The National Farmworker Jobs Program (NFJP) is a nationally-directed, locally-administered program of services for migrant and seasonal farmworkers (MSFWs) and includes 52 Career Services and Training grants, also known as Employment and Training grants, as well as 11 Housing grants across the United States and Puerto Rico. The program partners with community organizations and state agencies to counter the chronic unemployment and underemployment experienced by farmworkers who depend primarily on jobs in agricultural labor performed across the country.

The NFJP is an integral part of the public workforce system and a partner in the nationwide network of American Job Centers, also called One-Stop Career Centers. In addition, NFJP partners with state monitor advocates to provide services to farmworkers and their families working in agriculture employment. The NFJP program was created under the 1964 Civil Rights Act and is currently authorized under Section 167 of the Workforce Innovation and Opportunity Act (WIOA).

C. DATA ASSESSMENT

A review of the previous four years Wagner-Peyser data report indicate that Colorado has met all 5 of the required Equity Ratio Indicators and has met all seven of the required Minimum Service Level Indicators for each of the last 4 years. Colorado has also exceeded it's outreach and contact goals for each of the past 4 years. Colorado is in compliance with the requirements as a designated Significant Migrant and Seasonal Farm Worker State.

D. ASSESSMENT OF PROGRESS

A review of the previous four years Wagner-Peyser data report indicate that Colorado has met all 5 of the required Equity Ratio Indicators and has met all seven of the required Minimum Service Level Indicators for each of the last 4 years. Colorado has also exceeded it's outreach and contact goals for each of the past 4 years. Colorado is in compliance with the requirements as a designated Significant Migrant and Seasonal Farm Worker State.

E. STATE MONITOR ADVOCATE

The Colorado State Monitor Advocate has written, reviewed, commented on, and approved the four-year Agricultural Outreach Plan.

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-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and 7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.	Yes

WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	59.0%	57.0%	59.0%	57.0%
Employment (Fourth Quarter After Exit)	55.5%	65.0%	55.5%	65.0%
Median Earnings (Second Quarter After Exit)	5,192	5,600	5,192	5,600
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 piloted and this data will not be entered for 2020 State Plans.

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

A. ALIGNING OF CONTENT STANDARDS

In 2014, Colorado began a standards-based instruction initiative to promote the quality of adult education and family literacy outcomes to prepare learners for success in adult education, postsecondary education, employment, and the educational advancement of their children. The AEI office officially adopted the College and Career Readiness Standards (CCRS) and the English Language Proficiency (ELP) standards as frameworks to prepare Adult Education and Family Literacy Act (AEFLA)-funded programs for the new demands of high school equivalency exams. This adoption also signifies alignment with Colorado Academic Standards.

In support of this standards-based initiative Colorado joined the Standards-in-Action (SiA) national initiative in order to guide a statewide scale-up and sustainability plan of the CCRS. Statewide adoption of the CCRS promotes the explicit goal to equip students with the skills and knowledge needed for success in postsecondary education, employment, and beyond. AEI provides technical assistance on an as-needed basis to grantees for standards implementation.

B. LOCAL ACTIVITIES

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

The Colorado Department of Education (CDE) AEI office is the State's Eligible Agency for oversight of funding provided through the Adult Education and Family Literacy Act grant. AEI is responsible for administering funds to eligible providers and monitoring grantee use of those funds. For 2020-2024, AEI will provide funding to eligible providers at the local level for the provision of adult education and family literacy services as a component of the Colorado talent development system through a competitive request for application (RFA) process. The competitive grant process for local adult education and family literacy providers will follow the requirements outlined in WIOA Title II. Funds will be available for multi-year cycles for adult

education providers in partnership with local workforce centers for the provision of adult education and family literacy services offered contextually and concurrently with workforce preparation and training activities that support strengthening specific occupations and occupational clusters in local areas. Information from the annual Colorado Talent Pipeline Report will also be shared with adult education providers to assist them in aligning programming with the evolving occupations and occupational clusters relevant to Colorado's context. After successful development and implementation of a program, a provider may apply on an annual basis for continuation of financial support through Title II funding.

Local allowable adult education and literacy activities are outlined in WIOA Section 203:

- 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
- Integrated education and training

Eligible individual means an individual (1) who has attained 16 years of age and who is not enrolled or required to be enrolled in secondary school under State law (CRS 22.33.104) and (2) who is basic skills deficient; does not have a secondary school diploma or its recognized equivalent, and has not achieved an equivalent level of education; or is an English language learner. The Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will ensure direct and equitable access to grants and contracts and will use the same grant or contract process for all eligible providers in the state. All applicants follow a detailed request for applications, and each application is evaluated by a team of trained reviewers after proving demonstrated effectiveness. AEI will conduct desk, virtual and on-site monitoring as needed and in accordance with materials approved by the Office of Career, Technical and Adult Education.

Special Rule for Eligible Individuals

As outlined in the definition of family literacy activities (WIOA Section 203(9), children of eligible individuals may participate in AEFLA-funded family literacy activities. WIOA Section 203(4)(B) explains that an eligible individual is not required to be enrolled in secondary school under State law. Per C.R.S. §22-33-104, every child under the age of 17 shall attend public school for at least a certain number of hours defined in statute during each school year unless an exception has been provided under state law. AEI has outlined the following exceptions in which a 16 year-old may attend AEFLA-funded services:

- Condition of probation (C.R.S. §18-1.3-204(2.3))
- Condition of parole (C.R.S. §19-2-207 and C.R.S. §19-2-1002(1))
- In custody of court or law enforcement authorities (C.R.S. §22-33-104(2)(f))

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

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

The Colorado Department of Education's Office of Adult Education Initiatives (AEI) will reserve a percentage of the available AEFLA distribution funds (no more than 20 percent) and conduct a competition for eligible providers to submit applications for section 225 (Programs for Corrections Education and Other Institutionalized Individuals) funds. The Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will ensure direct and equitable access to grants and contracts and will use the same grant or contract process for section 225 funds for all eligible providers in the state. All applicants follow a detailed request for proposal, and each proposal is evaluated by a team of trained reviewers after proving demonstrated effectiveness.AEI will conduct desk, virtual and on-site monitoring as needed and in accordance with materials approved by the Office of Career, Technical and Adult Education.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

The Colorado Department of Education Office of Adult Education Initiatives (AEI) will promote, support, and fund grantee Integrated English Literacy and Civics services This program will address the needs of Colorado's large and growing immigrant population and other English language learners. The competition for Section 243 funds will require applicants to describe how each plans to provide English language acquisition and civics education concurrently and contextually. Applicants will be required to submit a narrative description of literacy and English language acquisition integrated with civics education that includes instruction on the rights and responsibilities of citizenship and civic participation. The proposed activities will be reviewed to ensure that they meet statutory requirements and scored according to a point-based scoring rubric after proving demonstrated effectiveness. Further, the competition will ask eligible providers to leverage partnerships for integration of workforce preparation activities and occupational components of integrated education and training in order to limit duplication of services and maximize Section 243 funds.

The Colorado Department of Education (CDE) Office of Adult Education Initiatives (AEI) will ensure direct and equitable access to grants and contracts and will use the same grant or contract process for all eligible providers in the state. Written proposals will be solicited through the formal request for application (RFA) which provides application procedures and forms to be completed by applicant organizations. Funding announcements will be placed on the CDE web site. All applicants will first complete an eligibility confirmation phase that follows the demonstrated effectiveness requirements outlined in 34 CFR §463.24. Once deemed eligible to apply because the provider has demonstrated effectiveness, the applicant will follow a detailed request for applications. Each application is evaluated by a team of trained reviewers. AEI will work with core partners and Combined State Plan partners to develop a communications/outreach plan to announce, inform, and provide technical assistance via publicly available Frequently Asked Questions and publicly available webinars to applicants across Colorado for Section 243 funds, alongside Section 231 and Section 225 funds.

In awarding grants or contracts for adult education and literacy activities to eligible providers, AEI will include the following 13 considerations outlined in WIOA Section 231(e):

1. The degree to which the eligible provider would be responsive to -
    a. Regional needs as identified in the local workforce development plan; and

b. Serving individuals in the community who were identified in such plan as most in need of adult education and literacy activities, including individuals who -

i. Have low levels of literacy skills; or

ii. Are English language learners;

2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities;

3. The past effectiveness of the eligible provider in improving the literacy of eligible individuals, especially those individuals who have low levels of literacy, and the degree to which those improvements contribute to the eligible agency meeting its State-adjusted levels of performance for the primary indicators of performance described in § 677.155;

4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under section 108 of the Act, as well as the activities and services of the one-stop partners;

5. Whether the eligible provider's program -

a. Is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains; and

b. Uses instructional practices that include the essential components of reading instruction;

6. Whether the eligible provider's activities, including whether reading, writing, speaking, mathematics, and English language acquisition instruction delivered by the eligible provider, are based on the best practices derived from the most rigorous research available, including scientifically valid research and effective educational practice;

7. Whether the eligible provider's activities effectively use technology, services and delivery systems, including distance education, in a manner sufficient to increase the amount and quality of learning, and how such technology, services, and systems lead to improved performance.

8. Whether the eligible provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;

9. Whether the eligible provider's activities are delivered by instructors, counselors, and administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high-quality professional development, including through electronic means;

10. Whether the eligible provider coordinates with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, Local WDBs, one-stop centers, job training programs, and social service agencies, business, industry, labor organizations, community-based

organizations, nonprofit organizations, and intermediaries, in the development of career pathways;

11. Whether the eligible provider's activities offer the flexible schedules and coordination with Federal, State, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs;

12. Whether the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes (consistent with section § 666.100) and to monitor program performance; and

13. Whether the local area in which the eligible provider is located has a demonstrated need for additional English language acquisition programs and civics education programs.

E. STATE LEADERSHIP

1. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT THE REQUIRED STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA

State Leadership will focus on effective grant management practices, data-driven decision-making and promoting effective instructional practices. AEI will designate State Leadership funds to effectively and efficiently provide support and service to the field. In accordance with section 223 of WIOA, funds for State Leadership will continue to support local programs in their integration of services with core partners, development of career pathways, and ultimately, to benefit all Coloradans and targeted populations. Colorado began this work through passage of the Adult Education and Literacy Act of 2014. This legislation began the work of aligning adult education and family literacy activities with the core programs of WIOA and one-stop partners. State Leadership projects will include:

1. Alignment of adult education and family literacy activities with other core programs and community partners for consistency of service, building on the work piloted through the Colorado Adult Education and Literacy Act of 2014, through talent development system integration events, statewide work group participation, ongoing technical assistance efforts, and sharing best practices already in existence across local areas;

2. Establishment of high quality professional development programs to improve instructional and programmatic practices, through a variety of delivery methods and targeting various audiences that may include grantee administrative staff, grantee instructors and WIOA core partner staff;

3. Delivery of consistent technical assistance to grantees through state leadership staff and subject-matter experts, which may include providing updated research on evidence-based practices in reading, writing, mathematics, English language acquisition programs, employability skills, digital literacy, distance education, career pathways, partnership development, and local workforce board representation;

4. Monitoring and evaluation of the quality of, and the improvement in, adult education and family literacy services focused on learner retention and outcomes;

Other strategic priorities to further enhance collaboration with core partners and the role of adult education and family literacy in the Colorado talent development system.

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

AEI will work with grantees to evaluate professional learning needs at the start of the grant cycle. Depending on grantee needs, professional learning may include: the use of instructional technology; developing content and models for integrated education and training and career pathways; developing and implementing programs that meet the State adjusted levels of performance; the development and implementation of a system to assist in the transition from adult education to postsecondary education, including linkages with postsecondary educational institutions or institutions of higher education; integration of literacy and English language instruction with occupational skill training; activities to promote workplace adult education and literacy activities.; incorporating standards into lesson planning; the content of occupational and industry skill standards widely used by business and industry in Colorado; developing and piloting of strategies for improving teacher quality and retention; developing and implementing programs and services to meet the needs of adult learners with learning disabilities or English language learners.

F. ASSESSING QUALITY

The Colorado Department of Education Office of Adult Education Initiatives (AEI) will assess the quality of sub-grant recipients through ongoing grantee monitoring and oversight. AEI will conduct desk, virtual and on-site monitoring as needed and in accordance with materials approved by the Office of Career, Technical and Adult Education. Quality will be evaluated through program visits, performance reports, and on-site program monitoring. Additionally, the grantees' ability to meet the federally negotiated performance targets will be reviewed. Grantees must provide data from all enrolled adult learners, progress measures attained by all learners that have attended at least 12 hours of instruction. Documented progress of student performance measures must include at a minimum:

- Educational functioning level improvements in reading, writing, and speaking the English language, problem solving, numeracy, and other literacy skills
- Placement in, retention in, or transition into postsecondary education, training, unsubsidized employment, or career advancement
- Attainment of a secondary school diploma or its equivalent.

All programs are required to maintain individual student records that include the data required by the statewide information system. Additionally, all sub-grant recipients are responsible for maintaining the privacy of the data for learners of all ages who participate in their programs. The AEI team evaluate the overall viability of all sub-grant recipients - both from fiscal and programmatic perspectives. The AEI team will compare trends in data and determine necessary technical assistance and next steps. The AEI team will also develop assistance plans for programs struggling to meet goals and objectives, and those plans will be used for service and support to providers. If a sub-grant recipient fails to meet performance goals or other programmatic requirements, the AEI office will take actions to assist the program in improving the quality of the program, which may include performance improvement plans and corrective plans.

AEI will assess the quality of professional development activities by ensuring that technical assistance and professional development focuses on the required and permissible activities under WIOA Section 223 (a).

AEI will also assess quality of professional development by providing opportunity for feedback, using surveys from the field after professional development opportunities.

In the past, AEI engaged American Institutes for Research (AIR) to interview adult education grantee staff. AEI also conducted visioning sessions around the state early in 2019. Annually, AEI collected and will continue to collect feedback from grantee staff at the annual grantee program director meeting. All of this input indicated a need for increased professional learning opportunities, in particular improving the quality of the Adult Basic Education Authorization (ABEA).

The ABEA is an authorization that began almost twenty years ago and was recently reviewed and modified to better align with WIOA. The ABEA competencies were created work instructors in focus groups and aligns with WIOA Section 223(a)(1)(B), in particular "including instruction incorporating the essential components of reading instruction as such components relate to adults, instruction related to the specific needs of adult learners…and dissemination of information about models and promising practices related to such programs.

The ABEA is delivered through classes or through demonstrated portfolios of experience that include observations. Additionally, the ABEA requires that instructors renew the authorization every five years, including 90 hours of professional learning to meet the requirements. All information for both initial attainment and renewal of the ABEA is tracked through CDE's Educator Licensing Office. The effectiveness of the ABEA is explored through surveys of instructors attaining the credential.

Colorado included a Professional Learning Assurance as part of the new grant cycle Request for Applications to ensure that the requirements outlined in WIOA Section 223(a)(1)(B) of "the establishment or operation of high-quality professional development programs" is also part of local grantee practice. This assurance includes training for leadership and instructors within AEFLA-funded programs. A local professional learning coordinator must be identified at each program to initiate local training that supports instructors earning the ABEA.

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 program;	Yes
3. The State legally may carry out each provision of the plan;	Yes
4. All provisions of the plan are consistent with State law;	Yes
5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;	Yes
6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;	Yes
7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and	Yes
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 participation in the program.	Yes
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes

AUTHORIZING OR CERTIFYING REPRESENTATIVE

APPLICANT'S ORGANIZATION	**Enter information in this column**
Applicant's Organization	Colorado Department of Education, Office of Adult Education Initiatives
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	**Enter information in this column**
First Name	Danielle
Last Name	Ongart
Title	Director
Email	Ongart_D@cde.state.co.us

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

The Office of Adult Education Initiatives (AEI) has taken multiple steps to ensure federally funded adult education programs are providing equitable access to, and participation in, Adult Education and Family Literacy Act (AEFLA) services in regards to students, teachers, and other program beneficiaries with special needs. AEI conducts data monitoring and frequently reviews program data disaggregated by the barriers outlined in the statute against state and local demographic data to spot trends in service provision and technical assistance opportunities. AEI also monitors the plans for Section 427 compliance that programs submit with their applications.

To ensure that disability status is not a barrier to participation in adult education programs, AEI was a lead partner of the Disability Employment Initiative grant Colorado was awarded in September 2017 by the U.S. Department of Labor (DOL). The state team worked to develop and

publish a programmatic accessibility course that is available to AEFLA grantees and frontline WIOA partner staff members. AEI also has an Accessible Design Policy that outlines requirements for local programs around ensuring equitable access to services, staff training, testing accommodations, language on promotional materials, etc. The execution of the policy is monitored by AEI staff during on-site visits. Professional learning opportunities are provided by AEI in collaboration with disability experts for local grantee Accessible Design Coordinators.

To ensure that race, national origin, and/or color are not a barrier to participation, AEI collaborates with multiple offices and agencies to understand and try to meet the needs of various populations around the state. AEI is fortunate enough to have a longstanding relationship with CDE's Office of Migrant Education and Office of Culturally and Linguistically Diverse Education. As part of the Colorado Department of Education's ongoing tribal consultations, AEI is collaborating with the Colorado Commission of Indian Affairs to ensure tribal concerns and needs are reflected in adult education services.

AEI takes a multi-pronged approach to ensure compliance with Section 427.

ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	23.0%	23.7%	24.0%	24.0%
Employment (Fourth Quarter After Exit)	25.0%	25.0%	26.0%	26.0%
Median Earnings (Second Quarter After Exit)	$5,123	$5123	$5,167	$5,167
Credential Attainment Rate	11.0%	11.0%	12.0%	12.0%
Measurable Skill Gains	38.0%	37.0%	39.0%	38.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

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 Colorado Division of Vocational Rehabilitation (DVR) has had a State Rehabilitation Council (SRC) for more than twenty–seven years. The SRC mission statement is:

The Colorado State Rehabilitation Council increases opportunities for Coloradans with disabilities to pursue success as they define it. Our members work in service of equality and access to full participation in all aspects of life, by advocating for the budgetary and programmatic integrity of the vocational rehabilitation program in the Centennial State, a resource for increasing employment and economic advancement. The SRC meets quarterly, including an annual retreat. The SRC depends on the following committees to help carry out its responsibilities: Membership; Customer Satisfaction and Program Evaluation; and Planning, Policy, and Education. Minutes are maintained of all SRC meetings, committee meetings and retreats. Minutes summarize the advice and recommendations provided to DVR by the SRC. DVR continues to work closely with the SRC to share and discuss information on finances, personnel, services to clients, agency policies, state rules, WIOA common performance measures, customer satisfaction, and any other items that impact the extent, scope, and effectiveness of rehabilitation services.

The SRC is currently evaluating DVR's customer and DVR program participant satisfaction evaluation processes, which includes electronic surveys available to all customers, along with postcard surveys available in each office. The SRC has been involved in focus groups conducted as part of the Comprehensive Statewide Needs Assessment (CSNA), and participates in public meetings hosted by DVR to gather stakeholder input. Each of these provide opportunities to learn about customer satisfaction. The results from customer satisfaction surveys along with guidance from the SRC, are used to drive more effective and efficient vocational rehabilitation services for customers. Quarterly customer satisfaction results are one data element of DVR's CSNA, and as such, are used as part of the development of the state plan.

DVR regularly seeks the advice of the SRC on pertinent issues, including the development and implementation of the state plan. To this end, DVR and the SRC jointly developed and conducted the 2018 DVR triennial Comprehensive Statewide Needs Assessment to determine the rehabilitation needs of individuals with disabilities in Colorado. The SRC and DVR established the goals of the CSNA and developed a plan for dissemination. Results were analyzed and findings were used to make recommendations to DVR that informed the state plan's goals, priorities, and strategies. The SRC and DVR will continue to conduct public hearings in person, by telephone, and electronically to obtain comment on the DVR state plan and on potential policy changes that are a part of the state plan.

As a result of the 2018 CSNA and the SRC's related activities, the SRC makes the following recommendations to DVR for the upcoming state plan period:

SRC Recommendation 1

The SRC recommends DVR increase the number of individuals served from rural areas and culturally and socioeconomically diverse communities. This will be done by encouraging and welcoming new applicants with disabilities that are in need of services in order to obtain employment. DVR will work to ensure offices are open and friendly, with staff who are culturally competent. Additionally, SRC recommends that new materials be developed for each targeted audience that focus on the successes of DVR; and the website should also reflect this. Based on information from the CSNA, SRC believes that DVR should target unserved and underserved populations including justice involved individuals; individuals with limited education; people with behavioral health conditions; those experiencing homelessness; individuals with intellectual and developmental disabilities; those with multiple disabilities; and

others. Outreach and education to community partners, including workforce centers, employers, educators, parents, and others to generate referrals will be crucial. As outreach is provided, technical assistance should be given to educate all communities about the Colorado Division of Vocational Rehabilitation.

SRC Recommendation 2

SRC recommends DVR continue to focus on increasing high quality employment outcomes for individuals with significant and most significant disabilities. SRC would like to receive quarterly updates on successful employment closures, median earnings from employment, and employment in the second and fourth quarter following exit from the program in order to evaluate and provide input on employment outcomes for individuals with significant and most significant disabilities.

SRC Recommendation 3

The SRC recommends all DVR staff receive ongoing training in order to provide effective and high quality services to all customers. An interdisciplinary approach may be employed where counselors and others with expertise work with staff to build skills. The SRC recognizes a need for training in these areas; excellent customer service skills for office staff; Customized Employment targeted to Business Outreach Specialists to support effective outreach to businesses on behalf of all customers; counseling and guidance, including the effective use of labor market information; effectively working with specific disability groups, including accessing community resources available to support their unique needs; available work incentives; assessment, including "Discovery"; cultural competence; job development; and the use of assistive technology to increase employment options. SRC suggests training also include best practices for implementing key elements of WIOA, including supported self-employment, customized employment, using "discovery" as part of the assessment process. DVR will ensure those providing this training have completed nationally recognized training and/or maintain nationally recognized certification in the topic area.

SRC Recommendation 4

The SRC recommends DVR ensure access to high quality supported employment services by actively seeking to increase capacity through outreach, training, and rate structure evaluation. DVR will utilize the newly funded Supported Employment Trainer/Coordinator positions to improve internal expertise among DVR staff, including Business Outreach Specialists, in utilizing evidence-based and promising supported employment practices (e.g., Individualized Placement & Supports (IPS) and Customized Employment). DVR staff responsible for providing training and technical assistance must have the requisite knowledge, including completing the respective nationally recognized training and/or certification(s). SRC recommends DVR continue to promote and assist supported employment providers to meet the requirement to complete nationally recognized training or certification by June 30, 2024, as required by Senate Bill 18-145. SRC would like to see DVR promote an early adoption of the requirements of Senate Bill 18-145 by encouraging supported employment providers to develop an implementation plan that should be submitted to DVR by January, 2021.

SRC recommends DVR lead, or engage in efforts led by partners, to explore and resolve the systematic issues limiting capacity to provide supported employment services, particularly related to the rate structures many providers cite as a limiting factor in their ability to expand services leading to competitive integrated employment for individuals with the most significant disabilities. Vendors working with DVR must receive training so that they have a clear understanding of the rehabilitation process and will be effective and qualified to work with both

counselors and the individual's they serve for the customers' success. Training topics should include specifics on the rehabilitation process, increased cultural competence, clear understanding of disability issues, supported employment, and use of interpreter and translation services, among others. Training may also include best practices for implementation of the key elements of WIOA, including customized employment, using "discovery" as part of the assessment process, and person-centered planning practices.

SRC Recommendation 5

The SRC recommends DVR consistently recognize assistive technology as a critical strategy for improving access to competitive integrated employment for individuals with significant disabilities. DVR should ensure counselors have opportunities for frequent and ongoing training in rehabilitation technology, improving counselors' ability to identify when and how assistive and universal technology can expand opportunities for competitive integrated employment. SRC recommends DVR explore opportunities to partner with the technology sector to identify new and developing technologies that may further improve accessibility and broaden opportunities for employment, as well as ensure a variety of qualified vendors to improve access to assistive technology.

SRC Recommendation 6

Despite ongoing efforts to improve and expand transition services, families and students still express difficulty accessing DVR services early enough to support an effective transition from secondary education. SRC recommends DVR create and implement an active plan to provide innovative and effective transition services to youth with disabilities, including those with the most significant disabilities, across the state of Colorado. To be as effective as possible, these strategies will need to include working with all stakeholders including the Colorado Department of Education, special education teachers, parents, workforce centers, and youth with disabilities. It is critical these stakeholders have a clear understanding of DVR's role, including DVR participation in Individual Education Program (IEP) meetings for transition age students. SRC recommends transition services through DVR align with Employment First principles, including assessments such as Discovery, Project SEARCH, and Customized Employment to support the success of students with the most significant disabilities. DVR should continue to collaborate with schools and workforce centers to provide pre-employment transition services to younger students with disabilities prior to their referral to vocational rehabilitation. SRC recommends including the provision of informational sessions coordinated with DVR's school partners to increase awareness of transition services and provide materials to transition youth and their families about the availability of services and supports through DVR.

SRC Recommendation 7

While DVR has successfully obtained sufficient non-Federal dollars to fully access the available Federal funds through the Rehabilitation Services Administration, SRC recommends DVR continue to actively work with the executive and legislative branches of Colorado government to ensure the stability of this funding moving forward. In order to create effective and far reaching success in the employment of people with disabilities in Colorado, it is critical the full allotment of Federal funds continues to be available and DVR minimize any risk of potential Maintenance of Effort penalties due to reduction in State funds. Ongoing communication with the legislature will need to focus on the success that DVR is having in all areas of operation.

SRC Recommendation 8

As DVR leads the effort for the Colorado Department of Labor and Employment and the State of Colorado to be a model employer, SRC recommends DVR explore the feasibility of establishing a Project SEARCH site within state government. Such an effort would demonstrate to business the benefits of inclusive work environments, while supporting the vocational training and employment of youth with significant disabilities.

SRC Recommendation 9

The SRC recommends DVR continue to emphasize a dual customer approach, ensuring quality services to business partners to support the employment of individuals with disabilities, including significant disabilities. Through outreach, training, and ongoing support, DVR can gain an understanding of the business community's need for qualified employees and assist businesses to find motivated and skilled workers by drawing upon highly talented and diverse workforces, inclusive of people with disabilities. Thus, helping both the customers of DVR and the businesses where they will work.

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

DVR Response to recommendation 1

DVR agrees with the importance of ensuring the vocational rehabilitation program is accessible to individuals in all areas of the state from diverse backgrounds. Effective outreach continues to be a focus for DVR; over the past several years DVR has strengthened communications, improved its website, and developed a social media presence. These efforts will continue as DVR has a staff position dedicated to Partnership Engagement and Communication. This staff leads DVR's efforts to ensure effective communication and outreach strategies using a variety of modalities and approaches. As DVR continues to implement Employment First and expand the availability of Customized Employment and supported employment, as described in Section (l), branding of these approaches may be considered in partnership with the Colorado Office of Employment First (COEF) to help create recognition within the community about the availability of these supports.

Additionally, DVR has sought to improve access in rural areas by evaluating office locations and adding offices in underserved communities, such as Cortez and Buena Vista. Similarly, co-locations with Workforce Centers are considered when this would improve access in particular communities. When it is not feasible to open a new office location or co-locate with a Workforce Center, DVR will evaluate opportunities to increase access to VR services within existing resources, such as by offering office hours at another WIOA program's location, use of available technology, or other innovative approaches. The Blind and Low Vision Services unit also has an increased focus on building competency within rural areas to meet the needs of individuals who are blind or have low vision, with the expectation that this will increase access to services.

DVR also agrees that individuals with additional barriers to employment may have even greater difficulty accessing DVR services. DVR Counselors work to improve access through strategies such as partnership with Wraparound Coordinators, Drug Courts, Parole and Probation, and various other community partners. DVR and CDLE have representation on a variety of advisory councils and task forces and there are likely opportunities for DVR to better leverage these groups to inform community partners and programs about the services and supports available through DVR. Cross training with the American Indian Vocational Rehabilitation Services programs in southwestern Colorado is ongoing and is a critical component of increasing the cultural competence of DVR staff and improve access to DVR services for Native Americans. As described in Section (l), DVR will also focus on growth and development plans for all staff. These

plans may include development of skills supporting the ability of DVR staff to provide culturally competent services when relevant.

DVR also seeks to continue to develop partnerships with Centers for Independent Living, Disabled Veterans Outreach Program (DVOP), Adult Education, and other programs with which individuals with disabilities may benefit from co-enrollment and coordination of services.

DVR Response to recommendation 2

DVR agrees that increasing high quality employment outcomes is critical to improving the overall success of the individuals served by the vocational rehabilitation program. DVR's key strategies to accomplish improved outcomes are addressed in Section (l) of the VR Services Portion of the Combined State Plan.

DVR further agrees that providing regular updates to the SRC related to employment outcomes, earnings, and employment in the second and fourth quarter following exit is critical to ensuring the SRC understands DVR's progress, successes, and challenges. This data is readily available and DVR will work with the SRC to ensure the information is routinely shared in an effective format and, as described in Section (l), consider other relevant data points which may support the SRC to more completely evaluate the vocational rehabilitation program.

DVR Response to recommendation 3

DVR agrees that effective and ongoing training is critical to provide competent and high quality services. DVR's Professional Learning and Development (PLD) unit recently completed a training needs assessment with all staff classifications, which identified many of the same areas recognized by the SRC. The PLD unit has already begun identifying or developing training to address several areas of training need, such as customer service and additional training for staff and providers working with clients who are blind or have low vision. Business Outreach Specialists receive various training to support their role and training needs, including Customized Employment, will continue to be explored to ensure business outreach efforts align with Employment First principles.

DVR is also re-organizing the reporting structure to better align all key functions related to the practice of vocational rehabilitation. A new Competitive Integrated Employment Manager will report to the Deputy for Field Services and oversee Employment First Initiatives, Supported Employment, Professional Learning and Development, and Youth Services and Transition. The intent is that this structure will allow for more efficient identification of training needs among field staff and ensure all training and development functions are aligned. DVR further agrees that it is critical that training providers are qualified with the requisite training, experience, and certifications in order to train others.

DVR Response to recommendation 4

DVR agrees access to high quality supported employment services is critical to achieving its mission. DVR continues to partner with the Department of Health Care Policy and Financing (HCPF) to support and enforce the implementation of the requirements of Senate Bill 18-145. DVR appreciates the desire to accelerate the training of providers. However, as the law and corresponding regulations provide for a 5 year transition period, DVR is inhibited from requiring providers to meet the requirement early or adding additional requirements related to their plan to meet the requirement.

DVR also agrees that systematic barriers limit current capacity for supported employment and is committed to exploring how these barriers can be mitigated. While it is unclear as of yet

whether these efforts are best led by DVR or other partners, such as the Office of Employment First, DVR will ensure relevant staff engage with appropriate partners to identify innovative approaches to increasing system capacity within available resources, as discussed in Section (l).

DVR understands the desire for vendors to be more knowledgeable about the VR process, cultural competence, disability issues, etc. DVR currently shares relevant training opportunities with vendors and offers some training to providers. However, DVR must balance training for vendors with ensuring fair and equitable provider selection, client choice, and available resources. DVR will continue to evaluate reasonable approaches to training vendors to ensure clients have access to well-qualified providers.

DVR Response to recommendation 5

DVR agrees that assistive technology (AT) is often a critical component to an individual's employment success. Particularly, for DVR's Blind and Low Vision Services (BLVS) unit, AT is an integral part of service delivery, with three AT instructors working directly with recipients of services to increase their use of AT. These AT instructors also support training for all instructors within the Personal Adjustment Training program.

While AT is most consistently integrated into the service experience of individuals working with BLVS, DVR recognizes that AT is important across the board and creates opportunities for increased independence and greater success. DVR also acknowledges that AT is often an area in which staff report difficulty staying current with developing technologies and understanding the various options that might be available to those they work with. Increased training in AT was an area of need identified in DVR's training needs assessment and as a result, the PLD unit is exploring training options to increase staff knowledge and utilization of available AT services and goods. One option that DVR will explore further, is to continue to develop DVR's collaboration with AT Partners to expand training opportunities available to DVR staff.

DVR appreciates the suggestion that partnership with the technology sector could be leveraged to support the development of new technologies. Given limited resources and expertise in the development of assistive technology, DVR believes this level of partnership goes beyond the scope of what DVR can effectively accomplish. However, DVR is able to serve as a conduit to share with clients opportunities to provide information about impediments that might be reduced through the use of AT. DVR would welcome the involvement of SRC in keeping DVR informed of these opportunities should members be aware of the need for input from individuals with disabilities in the development of AT.

DVR further acknowledges the need for qualified providers across the state to provide AT services and goods. While some adjustments were made to DVR's Fee Schedule related to AT evaluation fairly recently, review of other related rates will help to ensure established fees are not needlessly creating barriers to identifying a range of qualified providers.

DVR Response to recommendation 6

DVR agrees that improving transition and pre-employment transition services is an ongoing effort. DVR is reorganizing its reporting structure to better align all key functions related to the practice of vocational rehabilitation, including transition services. A new Competitive Integrated Employment Manager will report to the Deputy for Field Services and oversee Employment First Initiatives, Supported Employment, Professional Learning and Development, and Youth Services and Transition. The intent is that this structure will allow for more efficient development and coordination of processes that support effective service delivery, including transition services, as addressed in Section (l). Part of this reorganization includes adding two

new Youth Coordinator positions. This represents a significant expansion of available staff resources to support the types of strategies recommended by the SRC, including outreach and education to various stakeholders.

DVR also agrees with the SRC that collaboration and stakeholder engagement is critical to moving the needle with more students having access to higher quality transition services. Adequate staff resources for education partners at the state and local level are essential to making forward progress. While it is unlikely DVR can directly impact the available staff resources at another State agency, engaged stakeholders may be able to effectively draw attention to the impact of limited staff resources on the effectiveness of efforts to improve transition services across Colorado.

DVR has made significant progress in implementing pre-employment transition services in Colorado and agrees that it is now time to provide these services more efficiently and continue to improve their effectiveness. DVR has a process improvement team looking specifically at practices related to pre-employment transition services. This team is developing a curriculum framework that can be shared with staff, parents, education, and other stakeholders. The framework is intended to help identify where a student is currently related to pre-employment skills and abilities, in order to guide the nature and scope of pre-employment transition the student may need. The team is beginning a stakeholder engagement process to gather input from interested parties, supporting common language and understanding about student needs.

DVR Response to recommendation 7

DVR appreciates the SRC's interest and support in ensuring the ongoing availability of non-Federal dollars necessary to access the full Federal allotment through the Rehabilitation Services Administration. DVR's Executive Leadership Team is taking a proactive approach and exploring all available options to ensure ongoing non-Federal match is available to access the full Federal allotment and minimize any risk of Maintenance of Effort penalties. DVR agrees that ongoing communication with SRC and other relevant stakeholders, including the Colorado legislature, is an essential part of an effective strategy to ensure consistent and secure funding for DVR.

DVR Response to recommendation 8

DVR also believes that demonstrating the benefits of inclusive work environments is a key element of leading the State as Model Employer efforts. As addressed in Section (l), DVR has recently added a State Advisor on Disability Employment. This position will explore various opportunities to provide work experiences and internships within state government. This exploration is not limited to Project SEARCH, as efforts focus on how DVR can meet the needs of broader populations than those served through Project SEARCH.

DVR fully expects that expanded opportunities for various work based learning, along with increased opportunities for permanent employment will be developed within DVR, CDLE, and other state agencies.

DVR Response to recommendation 9

DVR agrees that continuing to develop understanding of the needs of the business community is necessary for DVR to achieve its mission. While DVR has had several staff dedicated to business outreach for a number of years, DVR's Business Relations Unit has refocused its efforts to ensure DVR is able to establish and maintain effective strategic partnerships with the business community. Business Outreach Specialists take the lead in cultivating these relationships

through outreach, education, and recruitment support. A key goal and strategy is to better understand the needs of businesses in Colorado.

DVR also recognizes the importance of effective use of labor market information when DVR counselors provide job exploration support and vocational guidance, which is one additional tool to ensure DVR is responsive to the labor needs of business. DVR is committed to continuing to develop expertise among counselors and other staff, with support from the Business Relations Unit, to utilize labor market information, including the use of TCI+ and similar tools, with the intention of assisting job seekers to develop goals leading to quality employment outcomes in key industries as described in Section (l).

DVR also has plans to expand its strategies to include monthly blog posts highlighting the benefits of hiring individuals with disabilities and other relevant information about disability employment. The blog posts can be linked on DVR's social media accounts and will be included in CDLE's Employer Newsletter, broadening the awareness of DVR and inclusive hiring practices.

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

N/A

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;

Colorado is not requesting a Waiver of Statewideness.

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

Colorado is not requesting a Waiver of Statewideness.

3. REQUIREMENTS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN WILL APPLY TO THE SERVICES APPROVED UNDER THE WAIVER.

Colorado is not requesting a Waiver of Statewideness.

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

1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

County Human Services Agencies

While DVR does not currently have formal interagency cooperative agreements in place with any county human service agencies, there is strong partnership at both the state and the local levels to enable human services recipients with disabilities to reduce their dependency on public assistance through employment. Counselors and supervisors have increased efforts and activities with county social service agencies in working with recipients of services, who have disability related employment issues. In several counties, DVR staff participate on county human services advisory boards. Local DVR offices have working partnerships with county human services agencies. The partners have developed referral processes to and from county

human service agencies and collaborate to obtain necessary services for DVR clients that DVR is unable to provide, including Medicaid, food stamps, Temporary Assistance to Needy Families (TANF), child care assistance and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC).

The Corrections System

DVR understands that many individuals who are involved with the Colorado corrections system are also individuals with disabilities. Colorado's correctional system is complex, with separate departments serving adults and youthful offenders, and juveniles. Additionally, there are regional and local jurisdictions, as well as state and private correctional facilities and providers. Individuals with disabilities who are involved with the criminal justice system continue to be underserved. DVR is committed to increasing the number of applicants from this demographic. To this end, local DVR staff have developed, and will continue to develop, working partnerships with probation offices, parole offices, and diversion programs, as well as working directly with many of the youth and adult correctional institutions in the state. For individuals who meet DVR eligibility, staff work to coordinate timely referral processes and services that complement release plans that are mutually developed by the individual with the disability and the correctional program to which they are attached.

MINDSOURCE - Brain Injury Network

MINDSOURCE Brain Injury Network operates under the Colorado Department of Human Services (CDHS) and is the lead State agency on brain injury. MINDSOURCE administers the Colorado Traumatic Brain Injury Trust Fund, established in 2002, when Colorado passed legislation that allows for the collection of surcharges on certain traffic violations such as Driving While Ability Impaired (DWAI), Driving Under the Influence (DUI), Speeding, and other moving violations. The statute requires the following three program areas: services for children/youth and adults with brain injury (specifically case management); research regarding the care and treatment of brain injury; and education to increase the awareness and understanding of brain injury. Through the TBI Trust Fund, case managers partner with DVR to help counselors understand how brain injury may impact the individual's ability to work and/or follow through with vocational planning. The program also works to provide education and consultation to DVR on a broader level. Finally, the program works across agencies and divisions to ensure policies and practices are inclusive of individuals with brain injury ultimately to ensure access to support for individuals with brain injury. MINDSOURCE strives to not only provide supports to individuals with brain injury and their families, but to also provide support to the systems that individuals with brain injury and their families interact with to obtain support, including DVR.

Rocky Mountain ADA Center

DVR does not have a formal cooperative agreement with the Rocky Mountain ADA Center, but has maintained an engaged partnership for several years. Currently, DVR's Partnership Engagement and Communication Manager serves as a Brand Ambassador, attending regular meetings to share information and strategies across the region. This partnership has also facilitated additional training for this member of DVR's staff, which will ultimately result in certification as an ADA Coordinator, allowing DVR to provide more comprehensive technical assistance to programmatic and business partners. DVR further supports the work of the Rocky Mountain ADA center through authoring blog posts, disseminating information, and developing accessibility tools.

Colorado Institutions of Higher Education

Colorado has a variety of institutions of higher education, including publically supported institutions, private accredited schools, area technical schools and private occupational schools. DVR routinely supports post-secondary training when necessary for an eligible individual to achieve his or her employment outcome. To ensure these services are well coordinated, local DVR offices work closely with each school to arrange for appropriate disability support services. This coordination is critical to individuals enrolled in training to complete their training and achieve their chosen employment outcome. The Colorado/Wyoming Consortium of Support Programs for Students with Disabilities (the Consortium) recently joined forces with the Association on Higher Education and Disability (AHEAD). Through this partnership, representatives from post-secondary disability services offices, DVR, and the Colorado Department of Education (CDE) meet twice annually for institutes that support communication between the community colleges, universities, CDE and DVR with regard to accommodations and professional development. DVR is currently seeking to renew memorandums of understanding with higher education to ensure compliance with the requirements of WIOA and effective partnership.

Collaboration with American Indian Vocational Rehabilitation Services

Colorado has two American Indian Vocational Rehabilitation Services (AIVRS) Program Grant Awardees. The Southern Ute Indian Tribe and the Ute Mountain Ute Indian Tribe are located in the southwestern part of Colorado, and the Ute Mountain Ute Reservation extends into New Mexico and Utah. DVR has cooperative agreements in place with both programs outlining the roles and responsibilities within each partnership and is beginning to plan for updating these MOUs prior to reaching their end dates. All programs have experienced staff turnover, requiring renewed effort and intention to ensure cooperation.

DVR has given primary responsibility for managing these relationships to the local supervisor to continue to strengthen the partnerships and implement the cooperative agreements. The partnership is particularly strong with the Southern Ute Mountain Tribe. The local DVR office meets monthly with the staff of AIVRS program and work collaboratively to meet the vocational rehabilitation needs of individuals eligible for both programs. Additionally, DVR's district supervisor attended CANAR and participates in training with the Southern Ute Mountain VR program. The partnership with the Ute Mountain Ute Tribe is still developing with current staff. However, DVR's district supervisor has begun meeting with representatives from the Ute Mountain Ute Tribe to support this relationship and it is hoped that similar cross training and collaboration can be developed in this community as well to ensure the vocational rehabilitation needs of individuals with disabilities are met. Recently, the Manager of the Southern Ute Indian Tribe VR program was appointed to the State Rehabilitation Council, further supporting ongoing partnership and collaboration between DVR and the AIVRS programs in Colorado.

Collaboration with the State Independent Living Council, the Centers for Independent Living and the Older Individuals who are Blind Program

DVR administers two programs mandated by Title VII of the Act:

- The Colorado State Independent Living Services (SILS) program and
- The Older Individuals who are Blind (OIB) program.

SILS programs are currently run out of Colorado's statewide network of ten Centers for Independent Living (CIL), which provide services to individuals with significant disabilities who face barriers to living self–directed lives in their communities. The OIB program is provided through a competitive process every three years for contracts. Currently seven of Colorado's

CILs and one Community Rehabilitation Program are awarded contracts on a three year cycle. Under the SILS program, Centers provide independent living skills training, individual and systems advocacy, peer counseling, information and referral, transition services for people leaving nursing homes and for youth moving into adult responsibilities, assistance with social security applications, transportation, housing and many other services that support clients to set and achieve their goals of living independently in their community. This diverse and extensive list of service types allows Centers to provide the holistic support that many clients with significant disabilities may need. DVR's local offices evidence close working partnerships and collaboration with all ten Centers. Together the partners share referrals, develop collaborative plans with clients, communicate to avoid duplicative service provision, and meet regularly to strengthen their relationships and cross–educate one another. The OIB program serves people who are 55 and older who are blind or have impairments to their vision. Clients tend to be people who are experiencing vision loss from age–related factors and who are concerned about losing independence, either in their home or in their community. The OIB program helps clients learn new skills and identify community resources that will support their participation in full, independent lives.

Office of Employment First, JFK Partners – University of Colorado Medical School

Beginning July 1, 2019, DVR received funding to establish an Office of Employment First through an interagency agreement with the University Center for Excellence in Developmental Disabilities (UCEDD), JFK Partners, at the University of Colorado Medical School. The Colorado Office of Employment First (COEF) is expected to be the primary source of training across Colorado communities in the area of Employment First philosophy, programs, policy, and practices. The COEF hired a Director in November 2019, who immediately began recruitment efforts to hire the remaining 6 staff positions that will support the work of the Office. COEF is responsible to coordinate, evaluate and monitor implementation of recommendations made by the Employment First Advisory Partnership (EFAP); develop and provide training and education regarding Employment First principles to individuals with disabilities, families, state agencies, employers, case management agencies, service providers, and communities; provide technical assistance to all relevant parties for developing and implementing supported employment models resulting in competitive integrated employment; serve as the focal point for Employment First resources and communications; develop and implement strategies for the sustainability of the COEF and Employment First in Colorado.

As the COEF becomes fully operational, it will become a vital partner for DVR to successfully implement its Employment First initiatives and build system capacity to increase competitive integrated employment outcomes for all individuals with disabilities in Colorado who wish to work.

Colorado Initiative for Inclusive Higher Education

In 2016, the Colorado Legislature created an Inclusive Higher Education pilot at 3 institutions of higher education, University of Northern Colorado, University of Colorado – Colorado Springs, and Arapahoe Community College. As these programs have developed, a team consisting of inclusive higher education program staff, Colorado Initiative for Inclusive Higher Education, parents, and DVR have collaborated to identify strategies for improving access to these programs when necessary for students with I/DD to achieve their employment outcomes. As a result of this work, training and policy guidance has been provided to DVR Counselors to support their work with individuals who may be considering these programs. Additionally, training and technical assistance is provided to inclusive higher education staff to better understand the vocational rehabilitation program. Local offices and programs have teamed to

provide orientation to families, further assisting them to understand when and how DVR might be able to assist students during their academic programs, as they begin to participate in work experiences, and ultimately when they are ready for permanent employment. All sides of this partnership continue to work toward strengthen this collaboration to best meet the needs of students with disabilities.

2. STATE PROGRAMS CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

Center for Inclusive Design & Engineering (CIDE), formerly Assistive Technology Partners (AT Partners) through the University of Colorado Health Sciences Centers provides services statewide under the Assistive Technology Act of 1998. DVR's Assistive Technology Coordinator is a member of the AT Coalition, which seeks to increase awareness and accessibility of assistive technology to Colorado residents. DVR and CIDE have a cooperative agreement in place outlining the manner in which the two programs work together to meet the assistive technology needs of individuals with disabilities. The agreement includes strategies for partnership regarding training for individuals with disabilities, their families, and DVR staff, as well as various resources for individuals to try, rent, or purchase assistive technology.

For example, DVR has a staff member knowledgeable in both assistive technology and the VR process who participates in the AT Coalition to promote access to AT for individuals with disabilities who are interested in employment. Both programs provide one another with cross training to ensure sufficient knowledge about each other's programs to support appropriate referrals and service coordination. DVR's Professional Learning and Development unit works with staff at CIDE when they identify a need for Rehabilitation Counselors or Rehabilitation Teachers to incrase their knowledge of AT to support the successful employment of VR participants. A variety of training and resources are available to DVR from CIDE at no cost. However, when more specialized or specific training is required, DVR and CIDE negotiate reasonable costs to cover the expense of developing and delivering relevant training.

CIDE maintains a website with resources to assist with finding and funding assistive technology. Training is available from CIDE to ensure DVR staff are able to assist individuals to navigate these resources in order to find appropraite AT resources. Both programs continue to explore additional strategies to improve access to assistive technology in Colorado, such as expanding an existing loan bank that was established through partnership with CIDE and the Colorado Department of Education.

Additionally, AT Partners is an approved vendor of DVR, giving DVR Counselors the ability to purchase rehabilitation technology services and devices when appropriate.

3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

The Colorado AgrAbility Project promotes success in agriculture for people with disabilities or other physical challenges and their families. Colorado AgrAbility is part of a nationwide network of United States Department of Agriculture (USDA) programs begun through the 1990 Farm Bill. Colorado AgrAbility works in collaboration with Colorado State University and Goodwill Industries of Denver. This grant was recently renewed for an additional three years. DVR continues to work in partnership with the AgrAbility Project to assist farmers, ranchers, farm workers, and their family members with disabilities, so they can continue to have successful careers in agriculture. DVR counselors collaborate closely with the AgrAbility Project staff to develop recommendations to ensure individuals with disabilities can safely and effectively continue successful agricultural employment. These recommendations often include the use of

assistive technology or other accommodations allowing the eligible individual to work in agriculture. Additionally, DVR and AgrAbility jointly provide information, including workshops, to farmers, ranchers and family members with disabilities and other pertinent individuals who would benefit from this information. Topics addressed during recent workshops sponsored by AgrAbility include an overview of the AgrAbility Project, Mental Wellness for Rural Farm Families, Aging in Place, and Financial Issues Affecting Farmers. Topics and content are developed based on the issues that are relevant for the local community at that time. AgrAbility holds workshops in various areas of the state. AgrAbility also consistently provides updated program information to individual DVR offices throughout the state to ensure all staff are informed of this important resource.

Individuals seeking agricultural employment are able to access the full scope of vocational rehabilitation services and work closely with a Rehabilitation Counselor to determine the nature and scope of services necessary to achieve the agreed upon employment outcome. The assessment completed by AgrAbility plays a key role in assisting the Rehabilitation Counselor to provide effective counseling and guidance services during plan development and throughout service provision to support client success. Often assistive technology and training on the use of this technology is a critical component of an individual's employment success within agriculture, along with business consultation and restoration services.

4. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH; AND

DVR and the Colorado Department of Education (CDE) recently partnered to develop a stakeholder group known as the Cross-Agency Collaborative on Transition to explore strategies and opportunities to best meet the needs of out-of-school youth. The collaborative includes not only staff from the Office of Drop-Out Prevention and Student Re-Engagement at CDE, but also Workforce Programs, Career & Technical Education, Employment & Training staff focusing on the development of Career Pathways, and the Colorado Workforce Development Council staff. Additionally, DVR takes an active role in state youth groups and committees to support ongoing collaboration between community agencies in the provision of services to out–of–school youth, such as the State Youth Council. The State Youth Council includes representatives from various partners serving youth, such as Division of Youth Corrections, Department of Human Services, Foster Care, local Workforce Development Boards, non-profit agencies supporting youth employment, Job Corps, other community organizations focusing on the needs of youth, and youth leaders. Participation in these groups and committees promote better coordination of services and shared resources at both the state and local levels. Participation and involvement allows DVR to participate in the development of processes, procedures, guidelines and practices for more effective transitioning planning and services throughout Colorado’s multiple areas and systems. DVR continues to explore opportunities for better partnership and develops formal agreements when appropriate.

5. STATE USE CONTRACTING PROGRAMS.

There are currently 3 non-profit agencies certified on the Set-Aside Services list, providing services to the State such as janitorial, marketing, document destruction, records management, food services, and landscaping. To qualify, seventy-five percent of the non-profit’s employees performing the work of the contract must be individuals with severe disabilities, and a minimum of twenty percent of those employees are individuals with developmental disabilities. The set aside program is managed by the State Purchasing Office and DVR is not directly involved. Some of the qualifying non-profit agencies provide purchased services to DVR clients, however employment under these contracts is not be considered competitive integrated employment by DVR.

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 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 (Pre-ETS), as well as procedures for the timely development and approval of individualized plans for employment for the students.

Since 1985, the Division of Vocational Rehabilitation (DVR) has partnered with the Colorado Department of Education (CDE), and with local school districts and Boards of Cooperative Education (BOCES), in supporting a comprehensive transition planning and service delivery process for youth with disabilities. DVR has organized a Youth Services and Transition Unit within Administration under Field Services. The Unit is responsible for assuring the provision of high quality vocational rehabilitation services to Colorado's students and youth with disabilities.

Colorado continues to explore with education partners how to best make available Pre-ETS and skills training when appropriate for positive post-secondary outcomes. DVR and CDE updated their interagency agreement in January 2017 to include: the provision of services under the new direction identified within WIOA; the redefinition of the transition responsibilities of DVR and of education; assurance of access to services for youth; and ongoing support of effective and efficient working relationships between partners. Since then, additional changes in state and federal laws have brought the need to update once again with consideration to data sharing, career and technical education with an emphasis on competitive, integrated employment for all persons with disabilities

Currently, DVR has 35 School to Work Alliance Program (SWAP) contracts. These contracts involve approximately 97 of Colorado's 178 school districts. SWAP serves upward of 4,000 youth annually, and is a collaborative initiative between DVR and local school districts, supported by CDE. The purpose of SWAP, along with the profile of who they serve, has been shifted to align with Colorado's implementation of WIOA. SWAP assists youth, ages 15-24 in making the transition from school to employment, achieve successful employment outcomes, increase community linkages through new patterns of service for youth within all categories of disabilities. SWAP provides case management and direct services to students with disabilities who are potentially eligible and applicants or eligible youth who have mild to moderate needs in employment and need support in developing vocational awareness, career exploration, and experiencing career and employment opportunities to become competitively employed and to achieve successful outcomes.

Since 75% of Colorado's identified students with disabilities in secondary public education fall within the SWAP profile, DVR continues efforts to onboard districts as a means for enhancing and supporting career pathway development. Efforts to make Pre-ETS available to those with most significant disabilities continues to be planned for.

Currently, DVR has three Project SEARCH partnerships which have involved up to seven school districts serving an average of 24 students with disabilities in their last year of transition programming at the secondary education level. The Project SEARCH Transition-to-Work Program is a unique, business-led, one-year employment preparation program that takes place

entirely at the workplace. Total workplace immersion facilitates a seamless combination of classroom instruction, career exploration, and hands-on training through worksite rotations. The program culminates in individualized, competitive, integrated job development for an average of 70% of the participants. Along with the Project SEARCH liaison, intentional efforts continue to look for new employer/education/DVR partnerships for news sites where enrollment and the economy can support this programming or a modified version.

At the local level, DVR counselors participate in resource fairs, back-to-school nights, and parent teacher conference nights. They present information about DVR at residential treatment centers, residential childcare facilities and at teacher in-service events. DVR will continue these types of outreach, education and consultation activities with our school partners for the purpose of providing consultation and technical assistance to support transition planning from school to post-school services. This contributes to an effective and consistent referral process for youth between agencies at the local level.

Collaborative efforts continue to be piloted and experimented around the state in an effort to identify locally what approach ensures services are available to all students who choose to participate. DVR has engaged in one-on-one and group conversations with districts to identify gaps relevant to pre-employment transition services resulting in summer boot camps, industry led workshops, district ran enterprises, work based learning experiences, disability specific work readiness skills training (i.e. mental health and autism), self-advocacy and peer counseling groups among other programming. We have partnered with both external vendors, Independent Living Centers, districts, independent educators, work force centers, community center boards and businesses to deliver these services in addition to DVR staff participating at various levels.

DVR has also collaborated with GlobalMindED's annual conference to support for young, emerging leaders and those who work with them to meet the network of role models and mentors who can help them start a business, contribute to a mid-size business, lead a non-profit or re-invent a Fortune 500 Company. Similarly, we support students with disabilities participating in Colorado's Youth Leadership Forum (CO-YLF). CO-YLF is an innovative, 5-day on campus conference for Colorado high school juniors, seniors, and young adults age 16-26 with disabilities, as they prepare for and experience transition to adulthood put on my Colorado's Statewide Independent Living Council. Students will stay overnight in college dorms at University of Denver and experience living independently. Designed to foster personal growth and leadership skills through self-discovery, the CO-YLF provides dynamic, experiential learning opportunities to assist each individual as they identify and embrace their strengths while planning for their future.

Program Improvement Effort (PIE) workgroup was developed to assist in identifying day to day challenges field staff need assistance with to be effective in the service delivery of Pre-ETS. This workgroup has developed a process to assist DVR Counselors with managing files for the upkeep of the Youth Programs (YP) case file and contributed to identifying new procedures for capturing accurate service information on contract invoices for Pre-ETS. Currently they are developing guidance to assist staff in the types of tools that can be utilized under each of the 5 mandatory Pre-ETS and how to have more in depth conversations with education partners to meet students' needs so we are being intentional and contributing to moving the needle.

The State Youth Council (SYC), which falls under the Education and Training Steering Committee of Colorado Workforce Development Council is redirecting our efforts to be more intentional. As part of this subcommittee, DVR's Youth Services works with the SYC to convene education, training, workforce and economic development stakeholders to align efforts at the

state and local levels and to increase collaboration and efficiency in partnering to develop an industry-responsive talent pipeline for Colorado. Strategies include bridging related projects at the state and local level to advance the development and equitable implementation of multiple pathways to economic success for Colorado's youth and young adults.

This year's Transition Leadership Institute put on by CDE will attempt to combine these efforts by including DVR partners at the table of local education transition teams as they develop their plans for school year 2020-21. Outcome goals for this institute will include educating DVR staff on relevant district terminology, standards and indicators, data usage for effective planning, Perkins V partnering and updating local memorandums of understanding.

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;

DVR continues to monitor and implement the state-level agreement between DVR and CDE. This agreement promotes flexible and collaborative planning and service delivery among DVR, local education agencies, local school districts, and other state and community agencies for youth who are transitioning from school to work and/or post-school activities which lead to employment. The agreement promotes accessible, timely and uniform vocational rehabilitation services for all Colorado students who have a disability and require vocational rehabilitation services. Additionally, the agreement encourages education agencies to develop, implement and promote pre-ETS and career exploration for students with disabilities prior to their referral to DVR for services. Finally, the agreement defines how transition planning must occur to assure that vocational rehabilitation services complement the transition services provided by education agencies. Consistent with education requirements, transition planning must begin what the student is 15 years old, and local education agencies are expected to invite DVR representatives to the IEP meeting, with parent consent. The transition IEP coordinates the plans developed with other agencies, including DVR, to support effective transition. DVR's policy manual also stipulates the time of referral as occurring when the student's focus begins to shift toward employment. This allows the DVR Counselor to work closely with the eligible student, and his or her parent/guardian, to develop an Individualized Plan for Employment (IPE) before the student leaves the school setting (or if Colorado DVR is operating under an order of selection, before each eligible student able to be served under the order leaves the school setting). The key tenets of the agreement have been developed into a desktop guide, updated annually and entitled the "CDE/DVR Cooperative Services Handbook for Youth in Transition". Thousands of these handbooks are distributed each year to youth, parents, educators, rehabilitation counselors and community–based agency providers.

Currently, DVR is partnering with CDE to update the interagency agreement signed in 2017 and the accompanying handbook. The 2017 update incorporated changes within WIOA and vocational rehabilitation regulation, but now will expand to include components related to the Student Data Transparency and Security Act (PDF) (HB 16-1423; C.R.S.22-16-101 et seq.), Employment First For Persons With Disabilities (SB 16-077), and the reauthorization of the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) now the Strengthening Career and Technical Education (CTE) for the 21st Century Act (Perkins V). These editions will extend to DVR's agreement with Institutions of Higher Education as well when this is updated. The purpose will be to educate partners on shared data and how it can be utilized in the design of effective service provision for strengthening post-secondary outcomes. Simultaneously,

Colorado along with our education and CTE partners hope to create a Transition Cadre that includes agency representation of the WIOA state plan to develop a strategic plan to increase equitable access for all students with disabilities to Alternative Cooperative Education (ACE) while promoting increasing competitive integrated employment opportunities for persons with disabilities. Once complete, the interagency agreement will guide local interagency operating procedures identified as an outcome for the June 2020 Transition Leadership Institute.

The introduction of Pre-ETS to Colorado's education partners initially was met with anxieties. Education partners struggled to understand how Pre-ETS did not supplant their mandated services under IDEA. Additionally, DVR staff were overwhelmed with how to implement. Our partnership with CDE has assisted in the delivery of messaging to local education partners through Director Meetings, newsletters and regional cadres. DVR has an ongoing and close partnership with leadership from CDE's Exceptional Student Services unit. This allows for routine and reciprocal technical assistance between DVR and CDE. Staff from both agencies regularly meet to collaborate on how to best support educators, DVR Counselors, community partners, and families to meet the transition needs of students and youth with disabilities. Local education partners may seek technical assistance and consult with DVR through various levels and methods of communication. At times, the local DVR Supervisor will consult with local education partners, such as when developing local practices for referral and DVR participation in IEP meetings. Other times, local partners will outreach to state level leadership within CDE and DVR to guide broader issues that arise in meeting and negotiating transition requirements of both systems.

Four Lead Rehabilitation Counselors specializing in transition services assist in providing mentoring and training DVR staff across the state specific to transition. These Counselors provide technical assistance and consultation to facilitate local partnerships and the development of effective transition services. DVR continues to develop guidance and tools, which will address day-to-day operational questions for field staff and education partners.

DVR also collaborates with educators to reach out to and identify students with disabilities who might benefit from vocational rehabilitation services. Meeting these needs remains a challenge, particularly within the rural and mountainous areas of Colorado, as well as for students who have the most significantly disables. The use of technology has helped to increase collaboration within large rural geographic areas, but could be utilized more. Those areas utilizing technology have been able to conduct one-on-one meetings with students and Pre-ETS workshops, including career preparation, connecting activities, youth development and leadership. Additionally, DVR staff have the capacity to video chat when feasible. This is successfully and widely used with young adults and the agencies and families who support them. DVR's Youth Services and Transition Unit is using technology, including Zoom to provide technical assistance, support and training to education and DVR partners simultaneously on topics that support partners as they strive to meet the ever growing need of Colorado's youth with disabilities who are preparing for career entry.

DVR intends to further explore social media and other electronic means of communication to attract youth, and as a mechanism to deliver Pre-ETS to students with disabilities. Using this technology is intended to improve client engagement and rapport with youth and DVR continues to pursue options such as Podcasts to reach more students.

Colorado recognizes a need to refine the delivery of Pre-ETS and is exploring with education partners how to best provide students with Pre-ETS that are intentional in order to make a positive contribution to the IEP outcome. DVR is also beginning to analyze available data with an eye toward identifying gaps and developing staff training to improve service delivery.

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 interagency agreement specifies how DVR and local education agencies will collaborate to implement each individualized education program, including facilitating the linkage of IEPs to other individualized service plans ensuring there are no gaps in services as the youth leave school. Currently, DVR is invited and participates in IEP meetings inconsistently. However, DVR is routinely able to access student IEPs with authorization from the student's parent or guardian. This allows DVR to coordinate and align pre-ETS and vocational rehabilitation services with goals and services identified on the student's IEP. As DVR and CDE update the interagency agreement, opportunities to improve practices and procedures that will facilitate joint planning and provision of services to students with disabilities will be explored.

C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

The interagency agreement includes roles and responsibilities of each party. The agreement references each party's mandated transition responsibilities and outlines services and activities that each may have primary or shared responsibility to provide. This information is consolidated into a Collaborative Services Chart, which is summarized in the “CDE/DVR Cooperative Services Handbook for Youth in Transition”, which is broadly distributed annually to each partner and families of students with disabilities. The most recent agreement has been expanded to include Pre-ETS.

Additionally, the agreement clarifies that education is responsible for providing and funding equipment and services needed for a student to participate in secondary education. Goods or services that are needed for the student to achieve his or her employment outcome may be provided as a vocational rehabilitation service to an eligible individual. The agreement requires that both education and DVR clearly stipulate these responsibilities and agreements in both the IEP and the IPE.

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

Through collaboration with education officials, DVR provides consultation and technical assistance to assist educators, as early as possible in the transition process, in the planning and provision of services that facilitate the movement of students with disabilities from school to post–school activities. Outreach occurs in a variety of ways and can vary to meet the local needs and include DVR staff participating in Transition Fairs/Resource Nights sponsored by a local district; DVR presence at various parent and stakeholder events targeting families with transition age students; outreach through partner agencies serving youth and students with disabilities, etc.

Maintaining effective partnerships at the local level continues to be an ongoing effort. Time is dedicated to mediating these relationships due to staff turnover within both entities, lost connections, and frustration with DVR processes. Unfortunately, this has required training to be more reactive in response to immediate requests, rather than proactively addressing upcoming needs. However, training continues to be a priority as DVR and CDE work with local teams to identify promising practices that can be replicated statewide to promote effective Pre-ETS and

transition services. As Pre-ETS were introduced and new programming was developed, other with school districts as the service provider, additional training needs with education partners were discovered, such as invoicing and reporting of services.

Consideration is being given to utilizing the Transition Cadre to develop statewide trainings with consistent messaging that can made available to ease the sequencing of services as students are linked to adult systems. DVR's Youth and Transition Services unit is in the process of adding two new positions to provide technical assistance and support in implementing transition services across the state, as well as the ongoing monitoring of youth services related contracts. These additional staff resources will increase DVR's ability to engage in strategic planning and more intentional program development to enhance WIOA implementation in Colorado and promote active participation of various stakeholder groups to better coordinate efforts. All with the goal of streamlining services to avoid duplication and truly creating pathways that result in positive post-school outcomes for students with disabilities.

DVR plays an integral role in annual institutes facilitated by CDE for local secondary education teams. The intent of DVR's involvement with the institutes is to elevate awareness and expand DVR's presence within education. The purpose of the institutes is to improve the quality of services in the area of secondary special education and transition at the local level through knowledge, capacity building, dissemination and outreach. The institutes, and the action plans which result from them, are supported and overseen by the National Technical Assistance Center on Transition (NTACT). Institute efforts focus on improving State Performance Plan Indicator outcomes identified in IDEA. Each of these Indicators measures the state education agency's effectiveness in meeting the needs of student's with disabilities. For example, Indicator 13 measures the percentage of students with appropriate post-secondary goals on their transition IEP, and Indicator 14 measures post-school outcomes for students who had an IEP when they left school. DVR commits content experts, presenters, DVR counselors, and technical assistance to local institute teams. This group is dedicated to identifying ways in which we can make positive changes for students.

Colorado's Transition Community of Practice gave way to a new group, the Cross Agency Collaborative on Transition. Key initiatives and expertise explored by this group include WIOA implementation, apprenticeship expansion, business services, job seeker services, career and technical education, career pathways, talent pipeline development, sector partnerships, special education, individual career and academy plans, incentive funds for industry recognized credentials and more. Over the last year, this group has been identifying a united direction using each entities' key initiatives. The group has also identified additional parties to include, such as subject matter experts in behavioral health and I/DD. Invitations will be extended to these groups for their contribution to align goals which support improved post-secondary outcomes.

DVR is also moving forward to create several outreach tools which will be utilized with both parents and representatives, including a family friendly brochure and restructuring DVR's website with links for parents and representatives with information and resources specific to transition. Using NTACT materials and developing consistent messaging with partners, such as the Cross Agency Collaborative on Transition, has also been an important strategy to improve outreach. Improving parent training and outreach is also a high level priority and has been built into our state plan with CDE at NTACT and includes our parent education center, PEAK.

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

The Colorado Division of Vocational Rehabilitation (DVR) values the partnerships that have been developed with private non-profit organizations in Colorado. DVR has developed partnerships at the state and local levels.

Project SEARCH

Project Search is a business led program and internationally trademarked model that leads to competitive integrated employment for youth with a variety of developmental disabilities. The success of Project SEARCH is dependent upon the active involvement of multiple partners within a community, including business, secondary education, postsecondary education, vocational rehabilitation, community rehabilitation providers, ongoing support agencies, families, and social security. Currently, Colorado has three Project SEARCH and is exploring opportunities to expand. Host business sites include UCHealth in Denver, Children's Hospital of Colorado in Denver, and Columbine West Health and Rehabilitation Facility in Fort Collins. DVR is actively engaged with each of Colorado's Project SEARCH sites and has entered into partnerships with the above-identified agencies to support the success of the program. Through braided resources, DVR collaborates with the multiple Project SEARCH partners to assure the seamless and successful delivery of transition services leading to integrated employment at minimum wage or higher. DVR responsibilities within Project SEARCH vary from site to site, and include program development, employer education and technical assistance, participant referral and selection, assessment, job coaching, transportation training, work experience, job seeking skills training and job placement assistance. Typically, local Project SEARCH partners enter into a written working agreement to support the success of the program and the young job seekers involved in the program.

PEAK Parent Center

DVR has a long-standing partnership with PEAK Parent Center. PEAK Parent Center is Colorado's federally-designated Parent Training and Information Center, working to ensure that all people with disabilities are fully included in their neighborhood schools, communities, employment and all walks of life. PEAK offers an array of free and low-cost services to families of children with disabilities and advocates, including self-advocates, across the state. Additionally, PEAK collaborates with education, early childhood, rehabilitation and medical communities to create systems change and offers fee-for-service opportunities, workshops and customized training for school districts, community groups and agencies. DVR partners with PEAK for a variety of the workshops and training events they plan and provide each year. . A key member of the PEAK leadership staff is an active member of the State Rehabilitation Council and the Employment First Advisory Partnership.

Colorado Community Centered Boards

Colorado has twenty local community centered boards (CCB), which are non-profit organizations responsible for the provision of case management services that assist individuals with developmental and intellectual disabilities in accessing necessary services and supports to meet their needs. Collaboration between DVR and the CCBs is especially evident in DVR's delivery of supported employment services, discussed in depth elsewhere in this State Plan. Additionally, DVR and CCB partners collaborate to cross-train at the local level and develop referral systems and processes to coordinate individualized client plans for habilitation and vocational rehabilitation that complement one another and eliminate duplication of services.

Community Mental Health Centers

Community Mental Health Center services include psychiatric services, individual and group therapy, peer services, support groups, medication management, intensive case management, educational opportunities and employment services including supported employment. Partnership between DVR and local Mental Health Centers is evidenced through the Mental Health Supported Employment Program, which operates under an interagency agreement between DVR and the Office of Behavioral Health (OBH) and contracts with 16 Community Mental Health Centers to provide supported employment services. Services consist of job development, job seeking skills, job coaching, and on–going support. The purpose of this project is to enhance employment opportunities for individuals with severe and persistent mental illness or persons in recovery. The project has resulted in increased integrated employment opportunities for individuals and is discussed in depth elsewhere in this State Plan.

Private Non-Profit Vendors

A variety of private non-profit organizations provide vocational rehabilitation services to DVR clients under a fee-for-service structure, including:

- The Colorado Center for the Blind (CCB). The CCB is a world-renowned training center located in Littleton, Colorado. The CCB provides innovative teaching techniques and philosophy that has far-reaching effects on the lives of individuals with blindness. Services purchased by DVR include: independence training for adults, year-round and summer employment, education and independent living services for youth; college preparation; and senior services.

- Goodwill Industries of Denver and Discover Goodwill Southern and Western Colorado. These programs work with both teens and adults to help them get the education and training they need to obtain and sustain meaningful employment and improve their lives. Services purchased by DVR include services offered within Goodwill areas of focus, including: youth career development at the secondary level; job skills training and placement for adults; work options for individuals with disabilities within Goodwill; retail employment; and recycling.

- Easterseals Colorado. Easterseals provides a variety of employment services to individuals with a range of disabilities. These services through Easterseals focus on individualized employment supports necessary for job seekers to work as independently as possible, including benefits counseling, customized employment, and Individualized Placement and Supports (IPS).

- Bayaud Enterprises. Since 1969, Bayaud has changed the lives of thousands of individuals in the Denver community by providing employment training, assessment, coaching, placement, work incentives counseling and retention services. DVR purchases all of these services from Bayaud. Executive level Bayaud staff have long held active membership on the SRC.

DVR has a written Provider Agreement with these providers and many others to ensure availability of vocational rehabilitation services. The Provider Agreement process is designed to assure adherence to three procurement requirements:

1. That all qualified vendors have the opportunity to compete for business with DVR if they choose;

2. That all vendors will be treated equitably and will be paid for their services in accordance with a standard method of rate setting procedures; and

3. That there will always be a written contract in place when annual expenditures to any vendor reach $25,000, as required by State Law, while assuring continuity of service provision to clients.

This effort has resulted in a consistent structure for establishing working relationships with service providers throughout the state and at the same time helps assure equitable payment across providers for the same types of services at the least possible cost.

Services are purchased based on competitive market rates instead of individual provider costs. Each vendor must complete the DVR Provider Agreement form to register them as potential provider of the specific services they are qualified to provide. Subsequent services purchased by DVR are limited to those identified on the agreement for which the vendor is registered.

The Provider Agreement obligates vendors to meet certain minimum qualifications as determined by DVR and agree to abide by the established payment procedures and rates for each service. Registration as a DVR vendor does not obligate vendors to provide services to DVR clients nor does it obligate DVR to purchase services from any given vendor. DVR strives to ensure an adequate pool of providers available to meet the needs and allow for the informed choice of all those seeking services from DVR.

Initial approval of the Provider Agreement, once signed by the vendor, is done at the local DVR field office. Approval then goes to DVR's staff authorized to sign provider agreements under contract waiver H1115. This method encourages the DVR field office and the service provider to establish a strong understanding of each other's roles and responsibilities in the provision of services to clients. It also puts the responsibility on the DVR field office supervisor to review the agreement for consistency between services offered and appropriate compliance with standards and credentials prior to their approval DVR counselors, and supervisors as applicable, authorize individual services for the individuals they work with.

DVR believes that these procedures help ensure that adequate contracting procedures are used and certify that:

- Purchases of services and goods maximize the efficient and effective use of public funds;
- Services and goods will only be purchased from qualified providers;
- All vendors who wish to provide services to DVR clients have the opportunity to do so and are subject to a consistent set of terms and conditions; and
- Most importantly, DVR clients have a wide range of options to choose from when selecting service providers.

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

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

DVR continues to partner with other state and local agencies, including the Department of Health Care Policy and Financing (HCPF), Office of Community Living (OCL), Department of Human Services (CDHS), Office of Behavioral Health (OBH), Community Centered Boards (CCB), and Community Mental Health Centers to ensure the availability of supported employment

services to individuals with the most significant disabilities. Over the last several years, these partnerships have focused on expanding evidence-based and promising practices in supported employment, including customized employment and Individualized Placement and Support (IPS).

In 2016, the Employment First Advisory Partnership (EFAP), was created through state legislation and tasks with developing recommendations to implement Employment First policies in Colorado. Membership includes representatives from 5 key state agencies, including DVR, CDE, HCPF, OBH, and Department of Higher Education (CDHE), along with various stakeholders, service providers, advocates, and individuals with disabilities. EFAP recommendations have supported collaboration throughout the system and have called for further developing system capacity through provider transformation and training. As a result of this work, additional state legislation was passed in 2018 requiring DVR and HCPF to require providers of supported employment services to obtain nationally recognized training or nationally recognized certification in supported employment. Together HCPF and DVR engaged in a stakeholder process to identify core competencies required of any training or certification to meet the provider standard. Providers may be eligible for reimbursement of associated training and/or certification costs and must meet the new standard by July 1, 2024.

Ongoing evaluation of supported employment services will continue as DVR and partners explore other systematic barriers, such as rate structures, the professionalism of the job coach, and the availability of benefits counseling, with the guidance of the EFAP. DVR also received funding beginning July 1, 2019, to establish the Office of Employment First (COEF) through an interagency agreement with the University of Colorado Medical Center. While COEF is just now developing, it is expected to be an integral partner for DVR in ensuring the availability of supported employment services for individuals with the most significant disabilities, including building capacity to ensure supported employment services are available across disabilities.

In Colorado, collaboration among relevant state agencies, private nonprofit organizations, and other community resources for the provision of extended ongoing support services takes many forms, ranging from informally established local cooperative working relationships between direct providers and clients of supported employment services to formally negotiated statewide agreements among state agencies. Informal working agreements are developed to coordinate activities such as transition from intensive supported employment services to extended services, the types of extended services to be provided, identifying qualified individuals to provide extended support.

The primary entities involved in these types of collaborative efforts are local rehabilitation offices, local school districts, Workforce Centers, Centers for Independent Living (CIL), local community rehabilitation programs, mental health centers, developmental disabilities service providers, CCBs, and other available service providers, including advocates, family members and private vendors. Although supported employment depends on these informal collaborative efforts, more efforts are needed to enhance the availability of extended support services following completion of intensive supported employment services authorized under WIOA.

Office of Behavioral Health, Department of Human Services

OBH and DVR have maintained a formal interagency agreement to provide vocational services to individuals with the most significant mental health disabilities. This agreement represents a collaborative effort to increase access to quality vocational services and to ensure the availability of supported employment opportunities for individuals with the most significant disabilities due to behavioral health impairments.

The agreement stipulates collaborative planning and coordination of services by the local mental health centers, private agencies, and rehabilitation offices to eliminate duplication of services and maximize available resources. It also contains provisions for purchase of supported employment services, including transitional employment services. Such services are only purchased from vendors approved by both OBH and DVR, such as mental health centers, and community–based programs. However, the rehabilitation counselor and client are responsible for determining the appropriate services and developing the supported employment Individualized Plan for Employment. Service providers must be registered with DVR to provide supported employment services under the DVR/OBH cooperative agreement.

Improvements have been realized in interagency planning, training, information sharing, and resolving mutual programmatic and procedural concerns. There has been ongoing cooperation at the State level between DVR and OBH. OBH has included funding for ongoing supports as part of its contracts with mental health centers. OBH has a full time Individual Placement and Support (IPS) trainer to assist the increasing number of Mental Health Centers that have adopted this service model. DVR recently added a Behavioral Health Supported Employment Coordinator/Trainer to further support local teams in developing these partnerships and skills in IPS.

For program year 2019, DVR has 16 Mental Health Supported Employment Programs around the state to providing services to participants eligible for supported employment, with most of these sites implementing the IPS model. For participants living in areas where there is not an available program, DVR utilizes vendors qualified to provide supported employment services and the mental health centers provide extended services.

Office of Community Living (OCL), Department of Health Care Policy and Financing (HCPF)

HCPF and DVR have a formal memorandum of understanding to increase access to quality supported employment services and to ensure the availability of supported employment opportunities for individuals with the most significant intellectual and developmental disabilities (I/DD). The agreement stipulates collaborative planning, coordination of services, and funding responsibilities between DVR and Home and Community Based Services (HCBS) Medicaid I/DD waivers to eliminate duplication of services and maximize available resources.

There has been ongoing cooperation at the State level between DVR and HCPF, including increased staffing on both sides of the partnership to support implementation of Employment First and recommendations made by the Employment First Advisory Partnership (EFAP). The increase in staffing is expected to fully develop provider capacity and competence, provide training to DVR staff in evidence based and promising practices of supported employment, including Customized Employment. These key staff meet regularly to facilitate effective coordination of services between the two systems. Jointly, DVR and OCL host periodic training opportunities and roundtable discussions to support collaboration between all partners engaged in providing supported employment services. The State of Colorado is a member of the State Employment Leadership Network (SELN). This membership is sponsored by HCPF, OCL.

DVR does not currently have formal cooperative agreements in place with any local CCBs. However, at the local level CCBs are important partners in DVR's effort to assure the availability of quality vocational rehabilitation services throughout the state. In most areas of the state, DVR has identified counselors who serve as a primary contacts for CCB staff. These counselors and district supervisors meet frequently with CCB staff to coordinate service delivery. These counselors focus on promoting successful competitive integrated employment outcomes for individuals with I/DD who have been determined eligible and are recipients of services through

the CCB system. For individuals who receive HCBS-IDD Medicaid waiver funding, the CCB works cooperatively with DVR counselors to ensure the provision of extended support services and the success of the individual's supported employment outcome. DVR staff, working together with CCB staff, assist and facilitate each eligible individual's informed choice in service delivery options, employment outcomes, and providers of services through networks of "approved service agencies". DVR staff attend board and committee meetings to facilitate an effective working relationship between our agencies.

DVR has lead I/DD Supported Employment counselors to support effective coordination and quality services for individuals with I/DD. These counselors serve as regional liaisons, providing training, guidance and support to all counselors in their areas to establish standards of practice with the local Community Centered Boards (CCBs) serving persons with intellectual and development disabilities. Additionally, these counselors serve as a liaison between the CCB, various community partners, vendors and independent contractors, and the local DVR office A Supported Employment Steering Committee works with the Supported Employment Program Manager to identify emerging trends and challenges, develop new and/or unique services in the community, and evaluate existing programs for individuals with IDD.

G. COORDINATION WITH EMPLOYERS

1. VR SERVICES; AND

DVR has 9 Business Outreach Specialist (BOS) positions throughout Colorado, along with a Business Relations Manager. This team takes the lead in cultivating DVR's business partnerships, providing a range of services and supports ranging from recruitment assistance; information and technical assistance to business related to the Americans with Disabilities Act, accommodations, and Section 503 of the Rehabilitation Act; Disability Awareness Training; support of job fairs; and similar activities.

BOS staff members determine beneficial memberships at the local level to include Chambers of Commerce, Society of Human Resource Management chapters, and economic development groups. Over the past 4 years, BOS staff have aligned efforts with the Business Services team through Workforce Programs. This allows for a more streamlined experience for business partners accessing supports available through the Workforce Development System in Colorado. BOS staff continue to utilize the Talent Acquisition Portal (TAP) as a resource for current job openings. Counselors are trained in accessing TAP and participant resumes can be created via this valuable resource. DVR's job placement providers can also access TAP to assist participants in creating resumes and accessing corporate jobs in TAP.

DVR regularly explores opportunities to expand and improve the use of labor market information to guide individual job seekers toward competitive integrated employment within growing industries and key sectors. DVR utilizes The Career Index Plus (TCI+), O*Net, Colorado's LMI Gateway, and other resources, while also engaging with partners across the Workforce Development System to access other available resources and coordinate efforts to facilitate these conversations. DVR counselors routinely seek opportunities for recipients of services to engage with business to support their career exploration and the development of vocational skills, including informational interviews, job shadows, work adjustment training, and work experiences, which typically occur onsite with local businesses. As DVR expands customized employment, additional partnership is expected with business to truly understand their unmet labor needs and be able to effectively navigate and negotiate job matches for individuals receiving these services.

2. TRANSITION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES, FOR STUDENTS AND YOUTH WITH DISABILITIES.

DVR maintains membership on the Colorado State Youth Council (SYC), which is a subcommittee of the Colorado Workforce Development Council and helps to ensure DVR's efforts are aligned with other partners of the Workforce Development System in Colorado, while highlighting promising practices in meeting the transition needs of youth.

Rehabilitation Counselors and Business Outreach Specialists, along with SWAP and various service providers, work closely with business partners to provide work based learning experiences, job shadows, informational interviews, and work site tours for students with disabilities. However, results from DVR's recent comprehensive statewide needs assessment survey show continued need to ensure these opportunities are consistently available across the state. DVR will examine those areas that have demonstrated success in creating work experiences to determine if there are common themes that other areas of the state can learn and use or if practices can be replicated.

In addition to work based learning experiences, job exploration counseling and work place readiness training regularly involve partnership with business to ensure students and youth have access to necessary information to make decisions about their career path. DVR continues to explore additional opportunities to partner with employers to support the provision of transition services, including pre-employment transition services, for students and youth with disabilities.

H. INTERAGENCY COOPERATION

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

The Colorado Department of Health Care Policy and Financing (HCPF) administers the State Medicaid plan under title XIX of the Social Security Act. Applicants and eligible individuals seeking services from DVR who are also eligible for Medicaid, must utilize their Medicaid resources when available to meet a VR service need. If the service need exceeds what is available through Medicaid, DVR may then assist with costs associated with necessary VR services. Additionally, when an individual seeks DVR support and may be eligible for Medicaid under the existing State Medicaid Plan, DVR refers the individual to apply for Medicaid to ensure access to healthcare, as well as comparable benefits for potential VR services, as applicable. HCPF also administers Health First Colorado Buy-In Program for Working Adults with Disabilities, which allows for individuals who do not qualify for Medicaid due to income to pay a monthly premium to access regular Health First Colorado benefits. In some cases, eligible individuals may also qualify for additional long-term services and supports through certain Home and Community Based Services (HCBS) waivers. DVR will seek opportunities to further develop this partnership to ensure even more effective collaboration. DVR continues to collaborate with HCPF related to provision of services for individuals eligible for HCBS waiver programs. Individuals who quality for these waivers have access to additional Medicaid funding to support their independent living and community access, which may include supported employment. DVR Counselors work closely with eligible individuals and approved service agencies to ensure services are coordinated across these systems.

2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

DVR has an interagency agreement with Health Care Policy and Financing, Office of Community Living. The agreement will be updated and renewed by July 1, 2020. The agreement formalizes

the ways in which DVR and the Office of Community Living (OCL) continue to work in collaboration to effectively plan and coordinate the provision of supported employment services to individuals with the most significant intellectual and developmental disabilities (I/DD) by community services agencies and DVR to avoid duplication of services thereby, maximizing available resources. As a result of this collaboration, much has been achieved in making community-based, integrated employment available for persons with I/DD.

Within this collaborative relationship, DVR is responsible for the provision of supported employment services including, but not limited to, job development and job coaching, before transitioning to the Medicaid waiver funding for extended services. However, in most cases, providers are approved by both OCL and DVR to provide supported employment services, allowing the individual to remain with the same service provider if they choose ensuring continuity of services and minimizing disruption to the individual's employment.

Supported employment services are purchased in accordance with DVR's fee schedule and service providers must meet DVR's established provider standards. Both OCL and DVR are implementing legislation requiring that all supported employment service providers obtain nationally recognized training or national recognized certification by July 1, 2024. Systems have been designed to encourage local level development of supported employment strategies between all DVR field offices and OCL supported employment service providers.

Colorado is a member of the State Employment Leadership Network (SELN), through the OCL. SELN brings together state Developmental Disability agencies for sharing, educating and providing guidance on practices and policies around employment to its members. DVR collaborates with OCL on activities with SELN, allowing both partners to benefit from this membership. As Colorado continues to implement Employment First, these conversations have helped to guide potential rule and policy changes within HCPF to allow for better alignment of supported employment and customized employment services between the two agencies, including the definition of competitive integrated employment.

DVR partners with OCL to hold periodic regional roundtables to create opportunities for discussion about issues faced by persons with I/DD seeking competitive integrated employment. DVR staff, vendors, family members and Community Centered Board provider staff generally participate. These roundtable meetings include presentations by DVR and OCL staff as well as small group discussion on relevant topics such as extended support services, individual supported employment, and line-of-sight supervision.

There are twenty Community Center Boards (CCBs) in the State of Colorado. CCBs are organizations designated in statute as the single entry point into the long-term service and support system for persons with I/DD. DVR continues to have lead counselors who work specifically with individuals with I/DD to help more effectively coordinate and provide quality services. These counselors provide training, guidance, and support to all counselors in their region, establishing standards of practice with the local CCBs. In addition, these staff are the subject matter expert and liaison between the CCB and the local DVR office as well as various community partners, vendors, and independent contractors. The lead counselors also work as a team in conjunction with DVR administration staff to identify emerging trends and issues, develop new and/or unique services in the community as necessary, and evaluate existing programs for persons with I/DD.

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

The Mental Health Supported Employment Program operates under an interagency agreement between DVR and the Office of Behavioral Health (OBH) and contracts with 16 supported

employment service providers throughout the State. Services provided through the agreements consist of job development, job seeking skills, job coaching, and ongoing support. The purpose of this project is to enhance employment opportunities for individuals with severe and persistent mental illness or persons in recovery. OBH joined the Dartmouth Collaborative in 2013. Since that time, DVR and OBH have partnered to support provider agencies to effectively implement the Individual Placement and Support (IPS) model, leading to improved outcomes for individuals with significant behavioral health impairments. IPS continues to expand in Colorado, with ongoing partnership between DVR, OBH, and local service providers.

OBH has staff dedicated to supporting the implementation of IPS and supported employment services. DVR recently added a Behavioral Health Supported Employment Coordinator/Trainer to expand capacity in developing supported employment programs to meet the needs of individuals with behavioral health impairments and build competency and skill among DVR staff, particularly with implementing evidence based supported employment models, such as IPS. These staff will continue to work together to further improve supported employment services in Colorado.

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;

DVR currently has approximately 250 full time equivalencies (FTEs) classified in the following personnel categories:

- Vocational Rehabilitation Counselors: 105.5
- Orientation & Mobility/Vision Rehabilitation Therapists: 11.5
- Assistive Technology Specialists: 2
- Rehabilitation Technicians: 11
- Business Outreach Specialists: 9
- Administrative Assistants: 33
- Program Assistants: 9
- District and Regional Supervisors/Managers: 23
- Business Enterprise Program Professionals: 5
- Central Office Managerial and Infrastructure Staff: 34

Across the state, counselors currently average an active caseload (in applicant and all active statuses) of 84 clients, including students with disabilities who are potentially eligible for vocational rehabilitation services and are currently seeking pre-employment transition services only. The ratio of vocational rehabilitation counselors to field support staff, including both rehabilitation technicians and administrative assistants is approximately 2.6 to 1.

II. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

To be fully staffed, DVR requires the following personnel:

- Vocational Rehabilitation Counselors: 117.5
- Orientation & Mobility/Vision Rehabilitation Therapists: 11.5
- Assistive Technology Specialists: 2
- Rehabilitation Technicians: 11
- Business Outreach Specialists: 9
- Administrative Assistants: 34
- Program Assistants: 10
- District and Regional Supervisors/Managers: 23
- Business Enterprise Program Professionals: 5
- Central Office Managerial and Infrastructure Staff: 37

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.

DVR continues to monitor overall staffing resources necessary to effectively meet the vocational rehabilitation needs of individuals with disabilities, including the most significant disabilities. As Colorado continues to implement Employment First, DVR is aware that there may be increased demand for supported employment services, including customized employment, by individuals who may not currently believe competitive integrated employment is available to them. Additionally, while DVR has made significant progress in identifying students in need of pre-employment transition services, we expect to continue to see a steady increase in the number of potentially eligible students seeking these services. DVR continues to explore ways to work more efficiently, including through training in evidence based practices for both counselors and providers, hoping to minimize the overall impact on DVR's ability to meet staffing requirements.

The rate of attrition of DVR staff averages about 13–18%, or approximately 35–45 staff per year, within the following personnel categories:

- Vocational Rehabilitation Counselors: 19 annually
- Orientation & Mobility Specialists/Vision Rehabilitation Therapists: 1 annually
- Assistive Technology Specialists: less than annually
- Rehabilitation Technicians: 2 annually
- Business Outreach Specialists: 1 annually
- Administrative Assistants: 7 annually

- District Supervisors and Regional Managers: 2 annually
- Business Enterprise Program Professionals: 1 annually
- Central Office Managerial and Infrastructure Staff: 10 annually

Based on this rate of attrition and expected staffing needs, DVR projects hiring the following staff over the next five years:

- Vocational Rehabilitation Counselors: 97
- Orientation & Mobility Specialists/Vision Rehabilitation Therapists: 4
- Assistive Technology Specialists: 1
- Rehabilitation Technicians: 8
- Business Outreach Specialists: 7
- Administrative Assistants: 37
- District Supervisors and Regional Managers: 8
- Business Enterprise Program Professionals: 3
- Central Office Managerial and Infrastructure Staff: 48

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 Northern Colorado (UNC), located in Greeley, offers a Master's degree in Rehabilitation Counseling. Graduates of the rehabilitation counseling program meet the minimum qualifications for a Rehabilitation Counselor I position.

II. THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND

Faculty at UNC indicates that there are currently 18 individuals enrolled in their graduate level Rehabilitation Counseling program.

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.

Faculty at UNC indicates 7 individuals graduated with Master's degrees in Rehabilitation Counseling during the 2018-2019 academic year.

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

DVR partners with UNC to offer internship opportunities for graduate students, sometimes hiring graduates into rehabilitation counselor positions at the conclusion of their student internship. When feasible, DVR also partners with universities from across the country to provide internship opportunities, particularly to students attending distance education programs or those considering relocating to Colorado. Additionally, there are a number of other

institutions of higher education across the state that offer Master's level degrees in counseling and related areas. Individuals obtaining this level of degree, when combined with the appropriate acceptable work experience, meet the minimum qualifications as well.

DVR is an equal opportunity employer and seeks to ensure employment opportunities are available to qualified individuals from minority backgrounds and individuals with disabilities, but no specific recruitment strategies targeting these groups have been developed. Additionally, DVR has recently undertaken a State as Model Employer initiative, which includes a full time State Advisor on Disability Employment. This position is responsible for developing and implementing strategies to increase the diversity of the workforce within both DVR and CDLE, while advising other State Departments and Colorado's Department of Personnel Administration regarding these practices.

In addition to standard recruitment efforts managed by the Office of Human Resources, DVR frequently posts vacant positions on social media outlets, shares postings with relevant stakeholders and community partners, and collaborates with all of the relevant educational programs. DVR also recruits using various resources such as The Summit on Program Evaluation, Emerging Leaders, CSAVR, and other university websites to post staff openings.

Current Status of Qualified Personnel

Of the 104 individuals currently in filled rehabilitation counselor positions within DVR (there are currently 11 vacant rehabilitation counseling positions), 1.5 FTE are currently categorized as rehabilitation interns and working on completing minimum qualifications to be rehabilitation counselors. 1 position is being recruited at the rehabilitation intern classification due to difficulty in recruiting a fully qualified rehabilitation counselor.

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

Colorado does not have state-approved or recognized certification, licensing or registration requirements for any of the personnel classifications used by DVR, specifically rehabilitation counselors. In collaboration with Colorado's Department of Personnel and Administration, DVR has established minimum qualifications that require all counselors to possess an appropriate Master's level degree, experience working with individuals with disabilities, and whenever possible, are eligible to obtain the appropriate nationally recognized certification. DVR has not made changes to current personnel standards as a result of the Workforce Innovation and Opportunity Act, and all professional staff positions continue to identify minimum qualifications that meet or exceed legislated requirements. DVR works closely with Department's Office of Human Resources, to ensure the staff responsible for the initial screening of applicants is knowledgeable of the education and experience requirements needed to assure qualified personnel.

When circumstances prohibit DVR from hiring a fully qualified rehabilitation counselor, DVR does maintain a rehabilitation counselor intern classification. If an individual is hired as a rehabilitation counselor intern, he or she is required to complete necessary coursework or accrue necessary employment experience to fully meet the minimum qualifications of a rehabilitation counselor within 5 years of the date of hire. In these situations, a training plan is developed with the individual identifying specific educational or experiential requirements that

must be completed and the timeline for completion. DVR assists these staff to connect with universities offering financial assistance through RSA administered long-term training grants. DVR connects rehabilitation counselor interns with these funding sources to the extent possible, as DVR is unable to provide any financial support for staff to complete graduate coursework. The intern classification is used only when efforts to recruit fully qualified rehabilitation counselors have been unsuccessful. However, it is a useful tool, particularly in rural areas of the state and to ensure a diverse workforce. In recent years, DVR has had several instances of "growing its own" through this strategy, with staff initially hired into a support staff position, then working as a rehabilitation counselor intern while completing graduate coursework necessary to eventually become a fully qualified rehabilitation counselor. This has proven to be a very positive recruitment and retention strategy in some of Colorado's most rural communities.

For more specialized and harder to fill positions, agencies are able to request a waiver to recruit out of state. DVR does maintain a residency waiver for rehabilitation counselor vacancies to expand the recruitment pool beyond Colorado.

DVR believes that the private sector is another good resource for recruiting experienced, competent staff. Through its relationships with various professional associations for counseling and other disciplines, DVR maintains a network for recruiting vocational rehabilitation counselors who have experience in the private sector. DVR ensures availability of accommodations necessary for qualified individuals with disabilities to successfully compete for and perform their job when hired.

DVR ensures rehabilitation counselors predominately serving clients who are deaf are skilled in American Sign Language and knowledgeable of deaf culture. Evaluation of these skills is incorporated in the screening and hiring process for counselors working with this population. Similarly, orientation and mobility instructors and vision rehabilitation therapists must meet the same minimum qualifications of a rehabilitation counselor, along with specialized skills necessary to provide orientation and mobility services and vision rehabilitation.

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.

DVR has established minimum education and experience requirements for all positions providing rehabilitation services to ensure personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities. All professional and paraprofessionals providing vocational rehabilitation services are required to possess the requisite knowledge, skills, and abilities to perform their job duties. In addition to the education requirements described in section i(3)(A), Rehabilitation Counselors must possess at least 2 years of experience working directly with individuals with disabilities providing relevant services. Similarly, Business Outreach Specialists must possess a Bachelor's Degree with experience demonstrating candidates have the foundational skills needed for success in the position. DVR managers regularly consider whether recruitment and selection processes, as well as education and experience requirements, for hiring personnel adequately evaluate the qualifications necessary to meet the standard of having a 21st century understanding of the evolving labor force and the needs of individuals with disabilities. As warranted, DVR has flexibility to work with the Office of Human Resources or the Department of Personnel and Administration to adjust minimum qualifications and hiring practices to ensure staff are duly qualified.

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

All new counselors participate in a comprehensive new counselor training academy to assure understanding of DVR policies and procedures governing service delivery. During this academy, counselors receive in depth training of legislation, regulation, policy, and processes from application through case closure using various training modalities, including hands-on practice with coaching. The Academy supports practical application of learned concepts by new counselors observing experienced counselors complete critical aspects of the vocational rehabilitation process, as well as structured observations by lead counselors and supervisors to ensure competency. Extensive mentoring and coaching continues, including the review of all work, until new counselors demonstrate consistent and thorough understanding and application of eligibility criteria, determination of severity of disability, completion of the comprehensive assessment, plan development and approval, provision of rehabilitation services, monitoring of employment, and appropriate closure decisions and practices.

During this period of training and mentoring, new counselors are evaluated on their skills and receive training to enhance their ability to effectively seek and synthesize disability, vocational, and labor market information to effectively and appropriately move clients through the vocational rehabilitation process from the point of referral to case closure. Counselors receive guidance and training to assist them to appropriately utilize assessments, determine service needs, including the application of available rehabilitation technology, and partner with other workforce development agencies. Counselors regularly participate in case consultations and clinical supervision with their supervisors and mentor counselors to develop and refine skills needed to make sound clinical decisions and provide excellent vocational counseling and guidance. While this initial period of training focuses on new counselors, supervisors regularly evaluate performance of all counselors and counselors may re-enter this period of enhanced training, coaching, and supervision as needed throughout their tenure.

A variety of personnel categories may elect to participate in the training academy or may participate at the recommendation of their supervisor, increasing the knowledge and understanding of the vocational rehabilitation process and the ways in which all staff support the success of individuals receiving services. Additionally, all staff have access to training relevant to their roles and responsibilities. As an example, Business Outreach Specialists receive training in vocational rehabilitation, sales and marketing, public speaking, use of labor market information, and other relevant topics.

Additionally, as part of DVR's performance management process, all staff consider areas of needed development in collaboration with their supervisors. DVR's performance management process requires all staff to identify a formal professional growth and development goal to ensure continuous learning. DVR's Professional Learning and Development unit regularly gathers information from staff, clients, and stakeholders to determine areas of training need and recently completed a training needs assessment with all personnel categories. Information gathered during the Comprehensive Statewide Needs Assessment, stakeholder meetings, quality assurance file reviews, customer satisfaction surveys, and periodic internal training needs assessments help to determine areas of focus and shape training developed or purchased to ensure necessary staff development is available. This team is currently working to develop a

training plan that will address the identified training needs through internal curriculum development, resources available elsewhere in CDLE or DPA, or outside partners.

DVR regularly provides access to a broad range of professional develop opportunities for staff through relevant seminars, workshops, webinars, conferences, and distance education to enhance staff skills and knowledge. Training topics commonly available include specific disabilities, ethics, case management, rehabilitation technology, assessment, job development and service delivery policies. Whenever possible training incorporates the dissemination of knowledge gained through research in rehabilitation. DVR regularly reviews offerings and expands training to ensure staff needs are met. Training in rehabilitation technology has been identified as an area of need among counselors and stakeholders. DVR's memorandum of understanding with the University of Colorado's Assistive Technology Partners (AT Partners), which is responsible for carrying out the Assistive Technology Act in Colorado, includes strategies for addressing training needs for staff. In the coming year, DVR intends to seek opportunities to more effectively collaborate with AT Partners to assure staff development needs in rehabilitation technology are fully met.

DVR continues to incorporate the principles of informed choice into all aspects of training curricula, including policy and procedural training. Such training efforts focus on helping clients develop skills necessary to analyze their strengths, resources, capacities, concerns, priorities, abilities, and interests, as well as a thorough understanding of the benefits and challenges inherent in various options available to them, allowing informed decisions to be made related to the development of their rehabilitation programs. DVR believes that these efforts help counselors become better facilitators and help clients develop the skills needed to be more independent and self-directed, as they go through the rehabilitation process and enter the workforce.

Additional training and development opportunities are available to support succession planning and leadership development. All DVR managers complete CDLE's Leadership Series to enhance their management skills and further prepare to lead the agency effectively into the future. All staff have access to a variety of courses available through DPA's Statewide Training and Development Center, which offers a Supervisory Certificate Program, consisting of a series of leadership and management courses. These courses can also be taken independently, allowing staff to focus on specific areas of growth supporting their leadership abilities. Annually, DVR supports participation of a small number of staff in University of Washington's Center for Continuing Education in Rehabilitation's Emerging Leaders in Rehabilitation Series and Vocational Rehabilitation Supervisor Academy, both of which have provided relevant training and development opportunities for leaders within DVR.

DVR continues to experience turnover at the executive leadership level due to staff retirements. However, DVR's new Director has extensive executive experience within CDLE and is quickly building expertise within vocational rehabilitation, seeking support from peers and partners as needed. DVR continues to focus on succession planning to ensure the agency is well-situated to address future staff changes. It is expected that ongoing and increased focus on individual professional growth and development goals will further prepare DVR for these changes moving forward.

B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.

DVR staff regularly participate in training, technical assistance, and community of practice opportunities developed and offered through the RSA funded technical assistance centers and other similar partners. Additionally, DVR provides access to a broad range of professional development opportunities for staff through relevant seminars, workshops, webinars, conferences, and distance education to enhance staff skills and knowledge. Available training incorporates the dissemination of knowledge gained through research in rehabilitation. In particular, members of the leadership team, including those with responsibility for coordinating services to clients with particular disabilities (e.g. blindness, deafness, mental illness, and intellectual disabilities) have opportunities to attend conferences and receive training where research relevant to their areas of specialization is disseminated. These staff use this knowledge help to shape policies, practices, and training for other DVR staff.

5. PERSONNEL TO ADDRESS INDIVIDUAL COMMUNICATION NEEDS

DVR believes strongly in being able to provide quality services to everyone who applies for vocational rehabilitation services. Consequently, DVR strives to meet the communication needs of all participants. DVR collects information about preferred language at the time of application and utilizes available resources to provide services and information in the language preferred by the individual. At the present time, approximately 23% of DVR's field offices have one or more staff members who speak Spanish. DVR also strives to ensure that offices in the areas with a high Hispanic population have at least one staff member who is also Hispanic. In addition, to Spanish and ASL DVR has staff members who speak a variety of other languages such as German, Hmong, Polish, Swedish, French and Luganda. All offices have access to interpreter and translation resources; these services are routinely used when needed to ensure effective communication. DVR also is able to access the State of Colorado Division of Refugee Services to capitalize on the knowledge, expertise and resources available to provide the best possible rehabilitation services to common clients. DVR ensures that critical forms are available in common foreign languages, including Spanish, and translates these forms to additional languages when needed.

DVR has developed specialized Rehabilitation Counselors for the Deaf and Hard of Hearing to better meet the communication needs of individuals who are Deaf. Proficiency in American Sign Language (ASL) is considered during the hiring process for these positions. If unable to hire a qualified rehabilitation counselor proficient in ASL, DVR explores opportunities to provide intensive ASL training to support effective communication. All offices have access to interpreter services.

There are approximately seven community-based organizations throughout Colorado that provide interpreting services as well as numerous private vendors. DVR provides personnel or obtains services to accommodate clients in need of appropriate modes of communication. Agency staff members who have an interest are encouraged to take sign language classes. DVR has contracts in place for interpreting services with several organizations and local staff are readily able to arrange for interpreting services. Every DVR office in the state has access to a telephone relay service available through Colorado's local telephone provider and those offices that serve a high number of individuals who are deaf are equipped with video relay equipment.

DVR also has the advantage of having several local colleges that provide interpreter preparation programs, such as Front Range Community College, Pikes Peak Community College, and the University of Northern Colorado. The combination of these programs is expected to sufficiently address future interpreter needs.

The capacity to provide materials in Braille is available through equipment located in some of the offices throughout the state. Additional needs are addressed through private transcribers. This has been meeting the current level of need. Many clients prefer materials electronically and this is accommodated routinely. Materials are also routinely made available in large print. In addition, all of the orientation and mobility specialists and vision rehabilitation therapists receive ongoing trained on the various uses of the iPhone and various applications that enhance accessibility.

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

As part of its implementation of transition services, including pre-employment transition services and Colorado's School to Work Alliance Program (SWAP), DVR has a formal cooperative agreement with the Colorado Department of Education (CDE). This agreement describes how each agency will provide cross training and technical assistance to local DVR and education staff to enable them to work more effectively with students as they partner to ensure a seamless transition from school to post-school activities. DVR and CDE regularly partner to develop, sponsor and provide comprehensive training and build effective partnerships at the local level.

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;

Every three years, the Colorado Division of Vocational Rehabilitation (DVR) and the State Rehabilitation Council (SRC), jointly develop and conduct a comprehensive statewide assessment of the rehabilitation needs of individuals with disabilities in Colorado. The triennial Comprehensive State Needs Assessment (CSNA) was developed and conducted in the fall of 2018.

Based on DVR's CSNA, increased access to supported employment was identified as a need for individuals with the most significant disabilities. In particular, stakeholders have identified systematic concerns related to fee structures and provider qualifications. Additionally, extended support services are lacking for many populations who do not currently have access to these services through existing Medicaid waivers. Services such as job development, job coaching, and rehabilitation technology were also identified as areas of need beyond those individuals requiring supported employment services.

In considering existing barriers to employment, additional rehabilitation needs were identified. The need to change employer attitudes about disability, including demonstrating the value of hiring individuals with disabilities was cited by multiple groups as a barrier to competitive integrated employment. Interestingly, the current job market was also identified as a barrier, despite the strong economy in Colorado with historically low unemployment across the state, suggesting there may be misalignment between the employment goals individuals with disabilities are pursuing and growing industries.

Concern about the impact of work on employment was also frequently cited as a barrier to employment, highlighting that effective and ongoing benefits counseling is a critical service when individuals with disabilities are considering employment.

B. WHO ARE MINORITIES;

While specific minority groups were not consistently identified as being underserved, individuals with Limited English Proficiency were frequently cited as having more difficulty accessing DVR services. While translation and interpreter support is offered, stakeholders and DVR staff indicated additional access to these supports is needed to improve participation in and benefit from VR services by those who are not fluent in English. DVR hires interpreters to allow for effective communication with this populations, but the capacity to provide VR services, such as job development, job training, and assessment services in someone's native language is limited, especially beyond Spanish. Additionally, the SRC expressed a need for further training to ensure culturally competent service delivery from DVR staff and service providers.

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

Despite ongoing efforts at outreach and partnership across the state, several groups were identified through the CSNA as having difficulty accessing DVR. The following groups of individuals were cited as unserved or underserved:

- individuals with brain injuries;
- youth;
- individuals who are justice involved;
- individuals living in rural communities; and
- individuals with a behavioral health disorders.

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

The CSNA did not identify significant gaps in access to VR services for individuals served by other components of the statewide workforce development system. Across the state, particularly with workforce centers, cross training efforts, collocations, and established referral processes have supported more effective service delivery across programs. Co-enrollment numbers demonstrate ongoing opportunity to ensure individuals are connected with multiple programs when appropriate, as well as effective coordination and documentation when individuals are co-enrolled. Lastly, the identification of individuals with Limited English Proficiency as a minority group who is underserved, would suggest an opportunity to strengthen partnership with Adult Education and Family Literacy programs.

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

The CSNA consistently highlighted opportunity for continued improvement with the availability and coordination of transition and pre-employment transition services. In particular, many families indicated they simply were unaware of the services available through DVR and indicated they most learned about DVR through other families rather than from the school district or directly from DVR. Some stakeholders expressed concern in being able to coordinate services effectively with DVR due to staff availability. In fact, only 20% of stakeholders reported that transition services were consistently coordinated and organized between the local school district and DVR. Some families also expressed concern about the quality of providers available to provide transition services. Work Based Learning Experiences and Workplace Readiness Training continue to be the pre-employment transition services that are most frequently sought

by students with disabilities. Supported employment, job development and placement, and job coaching were identified as the most important services for students and youth with disabilities to be successful in employment. Work Based Learning Experiences and Work Place Readiness Training were identified as the most important pre-employment transition services for students to prepare for employment.

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

While a number of unique ideas or concerns related to service providers collected through the CSNA make it difficult to draw clear conclusions regarding the need to establish, develop, or improve community rehabilitation programs, there are some common themes. For example, more providers to support job placement support and job training seemed, particularly those with expertise to assist individuals with more work experience or higher levels of education. Related is the need for more highly skilled supported employment service providers. In line with the identification of individuals with Limited English Proficiency as an underserved population, is the need for better access to foreign language services.

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

The CSNA consistently highlighted opportunity for continued improvement with the availability and coordination of transition and pre-employment transition services. In particular, many families indicated they simply were unaware of the services available through DVR and indicated they most learned about DVR through other families rather than from the school district or directly from DVR. Some stakeholders expressed concern in being able to coordinate services effectively with DVR due to staff availability. In fact, only 20% of stakeholders reported that transition services were consistently coordinated and organized between the local school district and DVR. Additionally, some stakeholders and staff identified that coordination is stronger for students who participate in the School to Work Alliance Program (SWAP), but students who do not work with SWAP have more difficulty coordinating transition or pre-employment transition services.

K. ANNUAL ESTIMATES

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

There are currently 7745 individuals eligible for services. DVR anticipates between 12,557 and 14,111 individuals will be eligible for services during Federal Fiscal Year (FFY) 2020, and between 11,228 and 15,492 individuals will be eligible during FFY 2021. These estimates are based on historic data and current trends in the number of individuals eligible for VR services.

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

A. THE VR PROGRAM;

During FFY 2020, DVR estimates between 8299 and 11,819 eligible individuals will receive services under an Individualized Plan for Employment, while between 6327 and 15,763 will receive services in FFY 2021. These estimates are based on historic data and current trends in the number of individuals eligible for VR services.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

During FFY 2020, DVR estimates between 986 and 1704 eligible clients will be served by DVR's supported employment program, and between 603 and 2473 eligible individuals will receive supported employment services in FFY 2021. These estimates are based on historic data and current trends in the number of individuals receiving supported employment services.

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

Based on historic data and current trends in the number of individuals eligible for VR services, DVR anticipates serving the following number of eligible individuals:

Year	Most Significant Disabilities	Significant Disabilities	All Other Eligible Individuals
FFY20	5863 - 8427	1616 - 3296	195 - 700
FFY21	4677- 9507	1002 - 4176	149 - 914

3. THE NUMBER OF INDIVIDUALS WHO ARE ELIGIBLE FOR VR SERVICES, BUT ARE NOT RECEIVING SUCH SERVICES DUE TO AN ORDER OF SELECTION; AND

Since April 30, 2015, DVR has not had a wait list for services. Based on the number of individuals anticipated to be served as described above and the fiscal and staff resources projected to be available to serve these individuals, DVR does not anticipate a deficit or the need to establish a wait list. DVR anticipates providing the full range of vocational rehabilitation services to all eligible individuals who will be served during FFY 2020 and FFY 2021.

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.

	FFY 2020	FFY 2021
Individuals with Most Significant Disabilities	$17,461,152	$20,654,048
Individuals with Significant Disabilities	$6,096,871	$7,469,537
All Other Eligible Individuals	$4,177,943	$4,965,784
Total of Serving All Eligible Individuals	$27,735,966	$33,089,369

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

The following goals were developed and approved in partnership between DVR and the SRC. DVR leadership proposed goals and priorities based on SRC recommendations, CSNA results, ongoing stakeholder conversations, and internal strategic planning activities. Proposed goals were shared with the SRC for review, revision, and agreement.

2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS

Goal 1: DVR will work with partners and stakeholders to reduce the prosperity gap for people with disabilities by increasing quality employment outcomes for individuals with disabilities. The following priorities and strategies will support this goal to reduce the prosperity gap for people with disabilities by increasing the employment outcomes for individuals with disabilities:

1. DVR will promote the rapid engagement of job seekers.
2. DVR will explore innovative opportunities to ensure continuous operation at full counselor capacity, despite inevitable situations of staff turnover, in order to improve the customer experience and support achievement of quality employment outcomes.
3. DVR will improve vocational counseling and guidance efforts to assist job seekers to develop goals that will lead to quality employment outcomes within key industries.
4. DVR will work with the State Rehabilitation Council to identify key data points, segmented at the appropriate levels, to monitor and track progress of all eligible individuals, including those with the most significant disabilites.
5. DVR will explore opportunities to develop a baseline measure of the overall customer experience and use this information to consider actions that will improve the customer experience.
6. DVR will develop and engage in outreach and awareness campaigns to improve access to the vocational rehabilitation program by individuals who are currently unserved or underserved.

Goal 2: DVR will create a culture of growth and development to support staff retention and high quality service delivery to individuals with disabilities. The following priorities and strategies will support the goal to create a culture of growth and development to support staff retention and high quality service delivery to individuals with disabilities:

1. DVR supervisors will assist staff to develop actionable and individualized growth and development goals, demonstrating commitment to highly skilled and engaged staff.
2. DVR will pilot State as Model Employer strategies, building a more diverse and effective workforce, improving overall program quality and developing internal expertise, enabling DVR to provide technical assistance and support to other businesses regarding inclusive hiring practices.
3. DVR will coordinate an internal staff committee to advise leadership on opportunities to improve the organizational culture, leading to the growth, development, and engagement of staff at all levels.

Goal 3: DVR will support the implementation of Employment First in Colorado, through the Office of Employment First and DVR’s Employment First Initiatives. The following priorities and strategies will support the implementation of Employment First in Colorado, through the Office of Employment First and DVR's Employment First Initiatives:

1. DVR will monitor and support the ongoing development of the Office of Employment First, in partnership with the University of Colorado Medical School, JFK Partners; the Colorado Office of Employment First; the Office of Employment First Advisory Committee; and the Employment First Advisory Partnership (EFAP).

2. DVR will effectively utilize Employment First staff positions, including the State Advisory on Disability Employment, I/DD Supported Employment Trainer/Coordinator, Behavioral Health Supported Employment Trainer/Coordinator, and Benefits Planning Coordinator.

3. DVR will support the State Rehabilitation Council to effectively coordinate the EFAP and support Colorado's progress on EFAP priorities and recommendations.

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;

These goals were developed based on the 2018 triennial Comprehensive State Needs Assessment (CSNA) results, and ongoing information gathered from various stakeholders, comments received during various public hearings, and planning and development activities of the SRC and DVR leadership.

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

DVR has been collecting baseline data for all performance accountability measures identified in section 116 of WIOA over the past four years. The data collection and reporting of these measures continues to be refined, further supporting accurate documentation of performance. DVR is confident the priorities and strategies identified will support increased employment, wages, measurable skill gains, and credential attainment.

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.

All available information has been considered in the development of the identified state goals and priorities, including the SRC's recommendations to DVR.

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

In accordance with the Rehabilitation Act of 1973 as amended by the 2014 Workforce Innovation Opportunity Act, Colorado DVR has designated that individuals with disabilities will receive vocational rehabilitation services in the following order of priority, and shall be classified in the highest priority category for which the individual is determined qualified:

First, eligible individuals with the most significant disabilities;

Second, eligible individuals with significant disabilities; and

Third, all other eligible individuals.

B. THE JUSTIFICATION FOR THE ORDER

DVR implemented an Order of Selection on March 1, 1993, in anticipation of projected economic and funding difficulties, to ensure DVR's ability to manage limited funds, and to guarantee continuity and fairness in the provision of rehabilitation services to persons eligible for vocational rehabilitation services. This action resulted from increased costs for vocational rehabilitation services, increased demand for services and increased numbers of applicants with disabilities.

Since March 1, 1993, DVR has restricted services through activation of the order of selection, four times. Most recently, on March 1, 2013. During the next two years, DVR carefully monitored and managed staff resources, fiscal resources and the wait list.

Through a series of eleven discrete releases of eligible individuals from the wait list, DVR was able to eliminate the wait list on April 30, 2015. Since that date, no wait list has been in place. Additionally, based on the number of individuals anticipated to be served in Program Years 2020-23 and based on the fiscal and staff resources projected to be available to serve these individuals, DVR does not anticipate the need to establish a wait list under Order of Selection. Continuing to operate under an Order of Selection, even with all categories open allows for improved consistency in program management. Placement into an Order of Selection priority category is a standard operating procedure, so DVR Counselors understand the requirements and complete determinations consistently across the state. This also enables clear communication with recipients of services and stakeholders on an ongoing basis about DVR's ability to serve all eligible individuals, rather than initiating this conversation for the first time when resources are limited. DVR has found that maintaining consistent practices with regard to Order of Selection has allowed for effective program management and minimized the administrative burden for staff created by such drastic policy change as implementing Order of Selection only when there is an immediate need for a wait list.

C. THE SERVICE AND OUTCOME GOALS

DVR anticipates sufficient resources to provide the full range of services to all eligible individuals.

D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER; AND

DVR anticipates sufficient resources to provide the full range of services to all eligible individuals.

E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

DVR, in accordance with federal requirements, has developed criteria that define the three priority categories to assure that individuals with the most significant disabilities are selected for services before all other individuals with disabilities. The priority categories are described below:

Most Significant Disability:

An individual is classified as having a most significant disability when he/she has a severe physical or mental impairment that seriously limits three (3) or more functional capacity areas (mobility, motor skills, interpersonal skills, communication, work tolerance, work skills, self–care and self–direction) in terms of an employment outcome; and, whose successful vocational rehabilitation can be expected to require the provision of two (2) or more core vocational rehabilitation services for at least five (5) months.

Significant Disability:

An individual is classified as having a significant disability when he/she has a severe physical or mental impairment that seriously limits one (1) or two (2) functional capacity areas and who otherwise meets the same criteria for a most significant disability. In other words, the individual's successful vocational rehabilitation can be expected to require the provision of two (2) or more core vocational services for at least five (5) months. An individual who is determined to be eligible for SSI/SSDI on the basis of his or her own disability is presumed to have at least a significant disability.

Individual with a Disability:

An individual is classified as having a disability when he/she meets DVR eligibility criteria but his or her disability does not meet the criteria for most significant or significant disability.

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

As DVR does not currently have a waitlist and does not anticipate a waitlist, a thorough analysis of whether eligible individuals who require specific services or equipment to maintain will have access to services regardless of the established order of selection has not been completed. DVR and the SRC will explore this option and potential impact in advance of any potential waitlist and, if necessary, DVR will develop policy that reflects the decision.

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

DVR's priority is to provide supported employment services to all who need them. Historically, DVR's Title VI–B funding has been insufficient to meet this need. DVR anticipates that if the Title VI–B grant is renewed, it will not be sufficient to meet the needs of all individuals who need supported employment services. DVR's electronic case management system provides the utility to ensure that Title VI–B funding is the primary source of payment for supported employment services when available. If that funding is not available, funding continues to be provided through Title I. Title I funds are also used for supported employment services provided under cooperative agreements.

Beyond Title VI-B funds, Colorado makes significant investment into its Supported Employment Program. Colorado passes legislation in 2018 requiring all supported employment service providers to complete nationally recognized training or certification in supported employment by June 30, 2024, and provides for reimbursement of training costs to providers completing training or certification. DVR partners closely with other state agencies, stakeholders, training entities, and service providers to ensure providers are able to complete this requirement. Additionally, DVR is developing training initiatives that will significantly increase the number of providers available to provide Customized Employment services.

DVR seeks to increase the number of individuals receiving supported employment services and to improve competitive integrated employment outcomes for these individuals. The training efforts described above will support increased provider capacity, leading to improved supported employment outcomes for individuals with the most significant disabilities. To successfully meet the supported employment needs of individuals with the most significant disabilities, DVR continues the collaborative efforts and working relationships between local

DVR offices and mental health centers, and between local DVR offices and agencies serving individuals with I/DD.

In partnership with the Colorado Office of Employment First, DVR and other state agencies providing Supported Employment services are evaluating the overall rate structure for these services, with the goal of establishing reasonable and sustainable rate structures that will support the availability of high quality supported employment services leading to competitive integrated employment.

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

DVR has developed policies and procedures to allow for the provision of extended services for youth with the most significant disabilities for a period not to exceed 4 years. DVR's electronic case management system also ensures that funds reserved pursuant to section 603(d) are appropriately expended and these expenditures accurately tracked.

Extended services are ongoing support services and other appropriate services that are needed to support and maintain an individual with a most significant disability in supported employment. Typically, another agency, the employer, or other source of support provides and funds these services. For youth through age 24, DVR may fund these services for a period not to exceed 4 years when no other funding source is available. During this time, the DVR Counselor works closely with the individual and his or her support system to determine alternate funding and the funding will shift to the non-DVR funding source, most often Medicaid HCBS waivers, once the resource is available. If DVR is funding extended services, the VR case remains open to allow for DVR to arrange for and monitor the services. To date, few individuals have had a need for DVR to fund extended services. Therefore, the reserve has been utilized almost entirely to provide supported employment services to youth.

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.

As described elsewhere in the State Plan, DVR continues to work closely with various stakeholders and partners to increase resources and improve supported employment opportunities for youth the most significant disabilities through the Employment First Advisory Partnership (EFAP). Several EFAP recommendations relate directly to youth with the most significant disabilities. During 2019, DVR partnered with WINTAC to begin initial training efforts in Customized Employment, including piloting this training the transition team at a local school district. As Colorado continues to expand this initiative, school district staff will continue to be an important partners. During the 2019 legislative session, key stakeholders played an important role in increasing state funding of DVR's and HCPF's Employment First initiatives, supporting the further development of supported employment opportunities for youth the most significant disabilities. This funding included the creation of the Colorado Office of Employment First (COEF), which will be actively engaged in further expanding awareness and opportunities for competitive integrated employment for individuals with the most significant disabilities, including youth.

During 2019, DVR and HCPF served as co-lead agencies for the Employment First State Leadership Mentoring Program (EFSLMP) grant. While this grant did not provide funding for supported employment services, the technical assistance provided supports Colorado's ability

to explore and identify strategies to further expand the implementation of Employment First, including supported employment. DVR continues to seek opportunities that build upon these experiences in order to ensure the availability of supported employment services to youth and others with the most significant disabilities.

DVR continues to work actively with education partners at both the state and local level to assure that youth with the most significant disabilities have access to career, transition and employment services, including supported employment services along with all Colorado youth. DVR has worked to infuse best practices within these areas, so that the needs of youth with the most significant disabilities are considered and met. Colorado DVR and Colorado Department of Education state-level staff work and travel as a team throughout the state to respond to requests and to provide training, technical assistance and facilitation to local community agencies, such as schools and adult organizations, as these entities work to provide collaborative transition services to youth with the most significant disabilities.

The Office of Behavioral Health applied for and, with DVR's support, has been accepted into the Johnson and Johnson–Dartmouth Community Mental Health Program. When funding for an IPS trainer through this program came to an end, OBH maintained this position to continue to build upon these efforts and further expand IPS in Colorado.

O. STATE'S STRATEGIES

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES

DVR has identified the following strategies to support its goal to reduce the prosperity gap for people with disabilities by increasing quality employment outcomes for individuals with disabilities:

1. DVR will promote the rapid engagement of job seekers.
2. DVR will explore innovative opportunities to ensure continuous operation at full counselor capacity, despite inevitable situations of staff turnover, in order to improve the customer experience and support achievement of quality employment outcomes.
3. DVR will improve vocational counseling and guidance efforts to assist job seekers to develop goals that will lead to quality employment outcomes within key industries.
4. DVR will work with the State Rehabilitation Council to identify key data points, segmented at the appropriate levels, to monitor and track progress of all eligible individuals, including those with the most significant disabilities.
5. DVR will explore opportunities to develop a baseline measure of the overall customer experience and use this information to consider actions that will improve the customer experience.
6. DVR will develop and engage in outreach and awareness campaigns to improve access to the vocational rehabilitation program by individuals who are currently unserved or underserved.

DVR has identified the following strategies to support its goal to create a culture of growth and development to support staff retention and high quality service delivery to individuals with disabilities.

1. DVR supervisors will assist staff to develop actionable and individualized growth and development goals, demonstrating commitment to highly skilled and engaged staff.
2. DVR will pilot State as Model Employer strategies, building a more diverse and effective workforce, improving overall program quality and developing internal expertise, enabling DVR to provide technical assistance and support to other businesses regarding inclusive hiring practices.
3. DVR will coordinate an internal staff committee to advise leadership on opportunities to improve the organizational culture, leading to the growth, development, and engagement of staff at all levels.

DVR has identified the following strategies to support the implementation of Employment First in Colorado, through the Office of Employment First and DVR's Employment First Initiatives.

1. DVR will monitor and support the ongoing development of the Office of Employment First, in partnership with the University of Colorado Medical School, JFK Partners; the Colorado Office of Employment First; the Office of Employment First Advisory Committee; and the Employment First Advisory Partnership (EFAP).
2. DVR will effectively utilize Employment First staff positions, including the State Advisor on Disability Employment, I/DD Supported Employment Trainer/Coordinator, Behavioral Health Supported Employment Trainer/Coordinator, and Benefits Planning Coordinator.
3. DVR will support the State Rehabilitation Council to effectively coordinate the EFAP and support Colorado's progress on EFAP priorities and recommendations.

As DVR implements Franklin Covey's *The 4 Disciplines of Execution*, individual units and teams are developing Wildly Important Goals and Lead Measures that will support and evaluate progress in these areas. DVR is planning for a formal implementation beginning July 1, 2020.

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

DVR has three dedicated assistive technology positions within the Statewide Personal Adjustment Training (PAT) Unit to provide assistive technology services to clients. The AT Specialists work with individuals with blindness or low vision within DVR's center–based program; however, referrals are accepted from clients with other disabilities as well. An additional assistive technology staff position, provides further AT support beyond DVR's PAT program for both individuals served by DVR and staff with the use of devices and software such as JAWS, iPhone, Dragon Naturally Speaking, testing of documents, and computer set-up.

Within the Blind and Low Vision Services unit, each of the vision rehabilitation therapists work with clients to provide assistive technology training. While these staff do not provide assistive technology on a full-time basis, they assess and provide training in this area as part of the individual's DVR program. DVR's BLVS unit regularly incorporates training on assistive technology into their ongoing professional development activities.

In addition to DVR's internal expertise, DVR has a number of statewide vendors for assistive technology services and equipment. As described elsewhere in the state plan, DVR also maintains an agreement with AT Partners, which provides services statewide under the Assistive Technology Act of 1998. The agreement defines the working relationship between

DVR and AT Partners, including how the partners will work together related to training for DVR staff and clients, the referral steps for an eligible individual to obtain more extensive AT services and the coordination of other related activities.

Despite these efforts, assistive technology was identified as an area of need in DVR's comprehensive statewide needs assessment. Given the rapid development of new and expanding technologies, DVR staff are aware of a need to continue developing their expertise in this area in order to promote the greatest levels of independence for individuals with disabilities seeking competitive integrated employment. As Colorado continues to implement Employment First principles, it is expected that increased availability of assistive technology will be a critical strategy to assisting eligible individuals to achieve their employment outcomes. DVR will continue to seek and identify opportunities to further develop staff expertise and availability of assistive technology services to program participants.

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

DVR is committed to providing quality services to everyone who is eligible to receive vocational rehabilitation services and recognizes the importance of effective outreach to ensure unserved or underserved populations have increased access to DVR. DVR intends to increase the number of applications for services from unserved and underserved populations, including minority populations. DVR has begun, and intends to increase, outreach to these populations to educate individuals with disabilities about DVR and support their access to vocational rehabilitation services, when these are needed. Strategies include:

- DVR will continue to strengthen communications, improve its website, and further develop its social media presence through a staff position dedicated to Partnership Engagement and Communication, which leads DVR's efforts to ensure effective outreach strategies using a variety of modalities and approaches.
- As DVR continues to implement Employment First and expand the availability of Customized Employment and supported employment, as described in Section l, branding of these approaches may be considered in partnership with the Colorado Office of Employment First (COEF) to help create recognition within the community about the availability of these supports.
- DVR seeks to improve access in rural areas by evaluating office locations and adding offices in underserved communities when warranted. Two recent examples include adding offices in Cortez and Buena Vista. Similarly, collocations with Workforce Centers are considered when this would improve access in particular communities.
- DVR will evaluate opportunities to increase access to VR services within existing resources, such as by offering office hours at another WIOA program's location, use of available technology, or other innovative approaches.
- The Blind and Low Vision Services unit also has an increased focus on building competency within rural areas to meet the needs of individuals who are blind or have low vision, with the expectation that this will increase access to services.

- Partnership with Wraparound Coordinators, Drug Courts, Parole and Probation, and various other community partners are intended to help reach individuals who are underserved.
- DVR will better leverage its participation on a variety of advisory councils and task forces to inform community partners and programs about the services and supports available through DVR.
- Cross training with the American Indian Vocational Rehabilitation Services programs in southwestern Colorado is ongoing and is a critical component of increasing the cultural competence of DVR staff and improve access to DVR services for Native Americans.
- As described in Section (l), DVR will also focus on growth and development plans for all staff. These plans may include development of skills supporting the ability of DVR staff to provide culturally competent services when relevant.
- DVR also seeks to continue to develop partnerships with Centers for Independent Living, Disabled Veterans Outreach Program (DVOP), Adult Education, and other programs with which individuals with disabilities may benefit from co-enrollment and coordination of services.

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)

Since the implementation of WIOA, DVR has worked to expand transition services and pre–employment transition services, youth and students with disabilities and has developed strategies that have enabled DVR to fully expand the pre-employment transition services set-aside. DVR has expanded pre-employment transition services to potentially eligible students with disabilities. To achieve this DVR will:

DVR agrees that improving transition and pre-employment transition services is an ongoing effort.

- DVR is adding two new Youth Coordinator positions within its Youth and Transition Services Unit. This represents a significant expansion of available staff resources to improve and expand VR services for students with disabilities
- DVR will continue to work toward improving collaboration and stakeholder engagement in order to improve student access to higher quality transition services.
- DVR will identify opportunities to provide pre-employment transition services more efficiently and continue to improve their effectiveness.
- DVR will develop a curriculum framework to identify where a student is currently related to pre-employment skills and abilities, in order to guide the nature and scope of pre-employment transition the student may need, and share this resource with staff, parents, education, and other stakeholders.

5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE

DVR has a Vendor Relations Specialist who coordinates a committee that works to effectively determine rates and provider standards for goods and services that vendors provide to address vendor related concerns and to improve the overall quality of vendors purchased from various community providers. This committee is tasked with evaluating service rates and provider standards on an ongoing basis to support the availability of high quality providers. Additionally, DVR staff across the state continually work to recruit new qualified vendors to increase client choice of service providers. DVR has code of ethics vendors agree to follow, which also supports quality service delivery.

In 2016, legislation in Colorado was passed requiring DVR and HCPF to establish a minimum provider standard for supported employment service providers. Supported employment providers must complete nationally recognized supported employment training or a nationally recognized supported employment certification by July 1, 2024. Beginning July 1, 2024, new supported employment providers who are not fully qualified must receive supervision by a fully qualified provider and must become fully qualified within two years. The legislation included an appropriation enabling providers to be reimbursed for associated training and/or certification costs during this transition period. DVR continues to partner with HCPF to ensure ongoing communication with providers regarding the requirements and barriers to completing training and/or certification timely.

In 2019, DVR implemented a Customized Employment pilot in partnership with WINTAC. This partnership provided for training in Customized Employment, including Discovery and Systematic Instruction, through Marc Gold & Associates for DVR staff, supported employment providers, education partners, and others. Service providers had an opportunity to obtain certification. Additionally, in response to EFAP recommendations, funding was appropriated to DVR to expand Customized Employment training. DVR will utilize this funding to research, develop, and implement a sustainable approach to training providers and staff on Customized Employment strategies, with the intention of ensuring there are trained providers statewide able to provide customized employment services.

Particularly with supported employment services, various stakeholders, including the SRC and EFAP, have suggested systemic barriers with the fee structure for these services limiting access to qualified providers for individuals in need of these services. While the details of this work are unknown as of yet, it is expected that DVR will engage with providers, partners, recipients of services, and other relevant parties to consider how fee structures can better align with the cost of providing these services to ensure availability of high quality service providers.

Benefits counseling has also been identified as a service lacking sufficient qualified providers. For a number of years, DVR held a small contract with Ability Connection Colorado, the WIPA grantee in Colorado, to ensure availability of benefits counseling services to DVR clients. However, the capacity proved insufficient to meet the demand for benefits counseling, while additional providers expressed interest in developing this expertise. While DVR counselors are now able to purchase benefits counseling services from a variety providers, this continues to be an area of provider development. DVR recently added a Benefits Counseling Coordinator, responsible for building internal training and capacity for counselors to make appropriate use of this service, while further exploring opportunities to develop statewide capacity for effective benefits counseling services.

6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA

DVR routinely monitors performance on the common performance accountability measures identified in section 116 of WIOA. DVR's MIS team works to ensure availability of performance reporting information and DVR's leadership team comes together on a regular basis to evaluate performance, identify trends, explore barriers, and develop strategies to improve performance.

As all performance measures have remained in baseline, DVR has not identified specific performance targets to date. Rather, DVR has focused on ensuring effective data collection and internal controls to support effective reporting. DVR continues to reinforce with staff the importance of accurate and timely documentation, particularly with appropriate validation of data reported. DVR's Quality Assurance Specialist is developing procedures to incorporate this validation more directly into qualify assurance reviews. Counselors often struggle to obtain timely documentation from program participants and/or partners to validate reported measurable skill gains or credentials. DVR will continue to explore strategies to ensure necessary documentation is received timely and measurable skill gains or credentials attained can be included in performance measures.

DVR believes success in employment and wages is directly connected to the nature of employment outcomes achieved by participants. Therefore, better use of labor market information to further promote employment outcomes in key industries in Colorado is a critical strategy to support performance accountability, with the expectation that employment in these industries will lead to higher earnings and prolonged employment for individuals with disabilities. As described elsewhere in the State Plan, the impact of employment on disability benefits repeatedly is cited by participants and partners as a limiting factor for individuals considering returning to work. DVR believes the focus on increasing the availability of benefits planning will lead to better performance when considering earnings and ongoing employment.

DVR commits to continuing to monitor and evaluate the implementation of the six common performance measures.

7. STRATEGIES FOR ASSISTING OTHER COMPONENTS OF THE STATEWIDE WORKFORCE DEVELOPMENT SYSTEM IN ASSISTING INDIVIDUALS WITH DISABILITIES

While collaboration between DVR and other components of the statewide workforce development system related to the delivery of effective services to individuals with disabilities has improved in recent years, there is still opportunity to improve these partnerships to ensure a seamless experience for job seekers with disabilities DVR intends to continue the following strategies:

- DVR participates in cross-training and sharing of curriculum among all core and combined plan partners. Several local areas have developed processes for ongoing cross-training for staff through on demand training resources, participation in staff meetings, job shadows, etc. DVR will place particular emphasis on collaboration, education and cross-training related to the delivery of effective transition and pre–transition services to students, youth and young adults.
- DVR explores opportunities to identify and assign a DVR liaison to core and partner program providers at the state and local levels.
- DVR infuses disability awareness and etiquette into the cross-education of core and combined plan partners, including the sharing of best practices in serving individuals with disabilities.

- DVR assures the participation of DVR disability subject matter experts on the committees of local workforce boards.
- DVR, in keeping with the spirit and the letter of the law, encourages and pursues the development of all MOUs, cooperative agreements and interagency agreements required and encouraged within WIOA.
- DVR ensures that DVR is represented and DVR staff are involved in state and local sector strategy efforts and activities.
- DVR ensures Disability Awareness Training is current and shares relevant materials, including DVR staff subject matter expertise, with core and combined plan partners to meet the needs of Colorado employers and promote a diverse workforce.
- DVR provides pre-employment transition services, including work experiences, to students with disabilities to assure that youth and young adults are better prepared for the services they will receive through other core and partner programs.
- DVR promotes STEM awareness, activities and opportunities, particularly through pre–employment and transition services to youth.

8. HOW THE AGENCY'S STRATEGIES WILL BE USED TO:

A. ACHIEVE GOALS AND PRIORITIES BY THE STATE, CONSISTENT WITH THE COMPREHENSIVE NEEDS ASSESSMENT;

DVR's strategies will support its goal to reduce the prosperity gap for people with disabilities by increasing quality employment outcomes for individuals with disabilities in the following ways:

By promoting the rapid engagement of job seekers, DVR expects to maintain or increase the motivation of individuals when they first request services. Creating opportunities for applicants to be proactive in moving forward with vocational activities as soon as possible, rather than being slowed by process will improve the customer experience, support engagement, and lead to increased employment outcomes. By finding solutions that will minimize the impact on service delivery when counselor vacancies occur will support timely, effective, and high quality services, supporting the achievement of quality employment outcomes. Increased focus on key industries in Colorado will support eligible individuals to pursue employment in which jobs are more readily available, pay higher wages, and offer more opportunities for advancement. Both DVR and the SRC believe that access to the right data is critical to monitoring progress, identifying barriers, and adjusting course as needed, including identifying more targeted approaches to meet the unique needs of various demographics. Lastly, a positive customer experience is critical to overall success of the vocational rehabilitation program, which goes beyond a simple survey of customer satisfaction. A positive customer experience supports engagement, progress, and participant success.

DVR's strategies will support its goal to create a culture of growth and development to support staff retention and high quality service delivery to individuals with disabilities in the following ways:

Developing actionable and individualized growth and development goals, demonstrating commitment to highly skilled and engaged staff, will help all staff evaluate areas in which they'd like to improve their skills, while creating more highly skilled workforce to meet the needs of individuals with disabilities. Implementing State as Model Employer strategies and building a

more diverse and effective workforce will improve overall program quality and develop internal expertise. As a model for inclusive hiring, DVR staff will be able to more effectively provide technical assistance and support to other businesses regarding inclusive hiring practices. Lastly, an internal staff committee to advise leadership on opportunities to improve the organizational culture will lead to the growth, development, and engagement of staff at all levels.

DVR strategies will support the implementation of Employment First in Colorado, through the Office of Employment First and DVR's Employment First Initiatives in the following ways:

Successful development of the Office of Employment First is critical to furthering Employment First in Colorado and to be successful key stakeholders must be involved in monitoring guiding its implementation. DVR received a time limited appropriation for four Employment First staff positions, including the State Advisor on Disability Employment, I/DD Supported Employment Trainer/Coordinator, Behavioral Health Supported Employment Trainer/Coordinator, and Benefits Planning Coordinator. Demonstrating the success these staff positions have on DVR's ability to implement Employment First will be critical to ensuring the sustainability of these positions and/or maintaining effective Employment First policies and practices. Lastly, effectively coordinating the EFAP and monitoring the State's progress on EFAP priorities and recommendations are vital to the ongoing success of Employment First in Colorado. Significant progress has been made and maintaining this momentum will require ongoing support from DVR and the SRC.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

DVR has primarily utilized innovation and expansion reserves to support the State Rehabilitation Council and the State Independent Living Council. The SRC spent $16,000 during 2019. These funds were used to pay the operating expenses the SRC incurred to complete their mandated functions. DVR and the SRC have been actively working together to develop an even more robust partnership, ensuring the SRC is an active and engaged partners in improving VR services to Coloradans with disabilities. In addition to their routine activities, the SRC is developing plans to improve their evaluation of customer satisfaction, member outreach, and engagement with relevant policy impacting VR at the state and national level. SB16-077 established the Employment First Advisory Partnership (EFAP) and designated the SRC to convene this inter-departmental and cross-agency advisory group to make recommendations to support the implementation of Employment First principles and practices in Colorado. As the body responsible to convene the EFAP, SRC also expended funds to faciltiate the EFAP, ensuring the group was able to fulfill its responsibilities, which support the development and expansion of competitive integrated employment opportunities for individuals with the most significant disabilities.

In 2019, the State Independent Living Council (SILC) was allocated and fully spent $48,000. These funds were used to monitor and develop the State Plan for Independent Living (SPIL); provide training and advocacy engagement opportunities for SILC members; and to organize and sponsor a Colorado Youth Leadership Forum (YLF). Beginning in the summer of 2018, the SILC has sponsored an annual YLF to prepare young adults with disabilities to serve as leaders within Colorado and their communities and to engage in the workforce. DVR's Office of Independent Living (Office) is the Designated State Entity for the SILC nad works with the SILC to improve and expand the services offered through the Centers for Independent Living (CILs) in Colorado. Of particular interest to DVR's Office and the SILC is supporting the CIL system

expand upon the services they currently provie to include high quality pre-Employment Transition Services, as a fee-for-service vendor with DVR.

DVR routinely explores opportunities to develop innovative practices and expand services. Beginning in 2015, DVR began a comprehensive Process Improvement Effort (PIE) to evaluate a number of business practices with the goal of improving efficiencies and effectiveness. DVR assigned a full-time coordinator to guide this project from January 2018 - September 2018. When additional coordination was required to complete a few remaining projects, a part-time coordinator was assigned from February 2019 through January 2020. Additional staff from across the agency were engaged in these projects and implemented a variety of recommendations to streamline business processes. While a number of processes have been streamlined to improve VR services, the group also identified a need to further develop resources and methods of providing pre-employment transition services to students with disabilities. DVR has assigned a full-time position to coordinate and expand pre-ETS activities across Colorado.

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.

Each of the goals and associated strategies have a role to play in overcoming barriers related to equitable access to and participation in the vocational rehabilitation program. In particular, a culture of growth and development will support staff to develop skills in areas of deficit, including cultural competence, disability awareness, or increased understanding or other characteristics creating barriers to accessing DVR. Improving the customer experience makes DVR more accessible to all people, including those who may be less inclined to access DVR or may be less aware of the resources available. Additionally, implementing Employment First will directly impact access to services, including supported employment, by ensuring competitive integrated employment is the first and preferred option for individuals with disabilities who wish to work.

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

DVR has made progress toward all of the identified goals and priorities and innovation and expansion activities established within the 2016 Combined State Plan. DVR will maintain process made in each of these areas, but has not identified these as ongoing goals for the 2020-2023 plan cycle.

Goal 1: DVR will increase outreach and vocational rehabilitation services to communities and cultures throughout Colorado, with emphasis on underserved populations

- Strategy 1: Establish partnerships with community partners, workforce centers, educators, business and other community resources to identify and connect with underserved populations and potential applicants for VR services.

Progress: Since 2016, DVR has improved existing partnerships with workforce centers and adult education to identify and connect with potential applicants. This has occurred through cross-education of staff across core programs and required partners, an increase in collocation,

DVR's involvement with the Job Seeker Services Alignment team, which seeks to improve the customer experience for participants across partners. Additionally, DVR has established collaborative partnerships with several Department of Corrections facilities, ensuring incarcerated individuals who are preparing to re-enter society are provided with information needed to make informed decisions about whether DVR may be able to assist with employment upon release. Similar efforts have been attempted with Juvenile Justice facilities and DVR will continue to pursue these partnerships to ensure detained and incarcerated juveniles with disabilities are connected to DVR when appropriate.

Local offices have developed partnerships with agencies providing substance abuse counseling in order to increase outreach efforts to individuals experience substance abuse, another underserved population in Colorado. These partnerships have resulted in increased referrals to DVR of individuals served by these organizations. Individuals who are deaf-blind were also identified as an underserved populations through DVR's previous CSNA. The Blind and Low Vision Services (BLVS) unit continues to collaborate with stakeholders to improve services across the State to individuals who are blind/visually impaired. Currently, in 2019, BLVS has a counselor who has ASL skills, which leads to improved communication with individuals who are deafblind. Additionally, BLVS has a Counselor who is knowledgeable about immigration services and policies. The unit has two counselors specializing in services to youth, while the other counselors are gaining skills in this area. There are also two counselors who are working towards being specialized in the self-employment process. In an effort to further improve services to individuals who are blind/visually impaired across the State, there have been several trainings offered to, and provided to, staff regarding the specific needs of those who are blind/visually impaired. DVR also continues to collaborate with the regional representative from the Helen Keller National Center for Deaf-Blind.

DVR recently created a Partnership Engagement and Communication Manager who leads and coordinates DVR's efforts to outreach to various stakeholder groups. This staff develops a monthly stakeholder newsletter that is emailed to stakeholders sharing general information about DVR, opportunities for involvement, relevant events, etc. Additionally, this position coordinates a DVR workgroup for all staff representing DVR on workforce development boards, with the intention of supporting more effective and engaged involvement of DVR staff on local boards, thereby creating more positive partnership at the local level.

As described elsewhere, DVR has sought to develop a more effective partnership with the American Indian Vocational Rehabilitation Services programs in southwestern Colorado. Significant progress has been made in this area, particularly with the Southern Ute Tribe. Cross-training and collaboration support more effective identification of individuals who may be served by both programs and key representatives from each program continue to explore strategies to further streamline this outreach and coordination of services.

- Strategy 2: Explore the expansion of technology and social media to provide better access and information to Coloradans.

Progress: Upon moving to CDLE, DVR worked closely with the Department's Government, Policy, and Public Relations (GPPR) unit to update DVR's website, establish social medical accounts, and develop updated marketing materials. With support from GPPR, DVR has been able to create marketing materials that are professional, accurate, and more appealing to potential clients and partners. In partnership with GPPR, DVR maintains social media accounts to ensure a virtual presence and create additional opportunities for potential clients to find DVR and learn about the services available and within the last couple of years identified a lead staff person who manages social media efforts. DVR's Partnership Engagement and Communication

Manager regularly posts engaging content of DVR' social media, including Facebook and Twitter. Content routinely highlights successes, strategies for making work places more inclusive and diverse, opportunities for stakeholder input, and other relevant topics helping individuals to learn more about DVR.

DVR continues to seek other opportunities to utilize technology in order to improve the experience of DVR clients. Strategies such as the use of electronic signatures for many aspects of the VR process have been identified as potential change to business practices that would facilitate an efficient experience for both DVR clients and staff, while making DVR more accessible to individuals living in very rural areas of the state.

Goal 2: DVR will expand transition services to Colorado's youth with disabilities, including pre-employment transition services (PETS), to Colorado's students with disabilities

- Strategy 1: Develop and update cooperative partnerships with Colorado school districts/BOCES, education providers and core workforce development programs to encompass PETS requirements.

Progress: DVR has worked closely with the Colorado Department of Education to ensure school districts/BOCES are well informed of pre-employment transition services. All education partners have received training in pre-employment transition services. Districts/BOCES with School-to-Work Alliance Programs have incorporated pre-employment transition services into these programs. Several education partners have worked with local DVR offices and the Youth and Transition Services unit to explore opportunities to improve referral processes for students with disabilities and strategies for providing pre-employment transition services. DVR and education continue to work together to refine these processes and ensure students in need of pre-employment transition services are identified and appropriately connected with DVR. Similar efforts have been completed with other workforce development programs to ensure all partners are knowledgeable of the services available to students with disabilities.

Ensuring these partnerships are effective is an ongoing effort due to staff changes and evolving business practices. Most recently, these efforts have been expanded to include career and technical education programs, post-secondary workforce readiness, adult education/dropout prevention, individual career and academic planning, post-secondary education, the Colorado Workforce Development Council, and Employment First. All partners are working together toward identifying consistent messages to promote partnerships which encompass who DVR can enhance and support existing programming through pre-employment transition services.

- Strategy 2: Create a youth transition unit within DVR to expand and innovate excellent transition services throughout the state.

Progress: DVR created a Youth and Transition Services Unit (YSTU) in 2016, and it has continued to evolve since that time to ensure effective management of transition services. Moving forward, the unit will be structured within Field Services and report to the Competitive Integrated Employment Manager. YSTU consists of a Manager, a Contracts Manager, and 2 new Transition Coordinators positions. Additionally, there are 4 regional Lead Counselors for Transition who provide technical assistance and training to counselors working with youth across the state, and support effective partnership with education at the local level. This team meets monthly to identify promising practices that can be replicated in other areas, identify gaps in data needed for effective strategic planning, and work toward achieving the goals established by the unit with regard to transition services

- Strategy 3: Explore the provision of transition services to groups of youth with disabilities who may have not yet applied or been determined eligible for vocational rehabilitation services and if feasible, develop policies and processes to provide these services.

Progress: DVR has developed policies and procedures guiding how pre-employment transition services are provided to potentially eligible students with disabilities and many of these services are provided in group settings, though not specifically through the authority to provide services to groups.

Instead, students "enroll" through a straightforward referral form in order to ensure complete reporting information is available. While the number fluctuates throughout the year, over Program Years 2017 and 2018, an average of 71 potentially eligible students enrolled with DVR to receive pre-employment transition services each month. All five pre-employment transition services are available to these students, with significant interest in Work Based Learning Experiences and Workplace Readiness Training.

Several interesting partnerships have developed as a result of DVR's active partnering with service providers and school districts to provide pre-employment transition services, including Workplace Readiness and Job Exploration boot camps, industry specific workshops, youth leadership training, entrepreneurial programs, employer driven summits, classes in financial literacy, etc.

Current strategies have resulted in DVR' full expenditure of the pre-employment transition services set-aside. Therefore, DVR has a pre-employment transition services workgroup explore process improvement strategies that will allow DVR counselors to work more efficiently in order to ensure more students have access to these important services. As efficiencies are explored, policies specifically addresses services to groups may be warranted (e.g. the development of podcasts or webcasts to reach students with relevant pre-employment transition services).

Goal 3: DVR will Increase the skills of DVR staff and service providers to assure a 21st century understanding of the labor market and the provision of quality services that meet the needs of Coloradans with disabilities

- Strategy 1: Implement integrated professional development for DVR staff with WIOA partner programs to elevate internal expertise and equip them with the tools necessary to operate a comprehensive, holistic approach to talent development for business and industry, putting particular emphasis on leveraging the synergies resulting from the merger of DVR and CDLE.

Progress: Since the implementation of WIOA, DVR has been closely engaged with WIOA partner programs to ensure cross-education across partners and ensure a comprehensive approach to services for all participants. DVR is represented on the Job Seeker Services Alignment team, which seeks to create alignment of process, procedures, forms, and data collection to the extent possible across all programs, in addition to promoting cross-education across partners and co-enrollment of participants. Further, this team seeks to ensure ongoing opportunities for cross-education among partners to occur. These professional development opportunities occur at the state, regional, and local level to ensure consistent information and support local partnership. DVR's Business Outreach Specialists are members of CDLE's broader Business Services Team, and serve as a conduit to bring real-time Labor Market Information (LMI) back to their local teams. Further, DVR received intensive technical assistance from the Job Development Vocational Rehabilitation Technical Assistance Center with the goal of infusing LMI into the

comprehensive assessment process to establish employment goals that tie into available LMI, leading to higher wages and increased self-sufficiency of clients.

DVR provided training on The Career Index Plus (TCI+) career information system for staff, including Rehabilitation Counselors, Rehabilitation Technicians, and Business Outreach Specialists. DVR also partners with the Department's Industry Partnership Coordinator to ensure DVR staff have access to the Virtual Job Shadow career information system,

- Strategy 2: Develop processes to ensure a statewide cadre of qualified vendors able to meet the requirements of working with disability-related issues.

Progress: DVR has an established vendor registration process, which involves review of provider qualifications to ensure individuals providing services have the knowledge, skills, and abilities necessary to provide high quality vocational rehabilitation services. DVR has a Vendor Relations Specialist who supports local teams in developing new vendors when needed. This staff also offers technical assistance to vendors when required to ensure appropriate qualifications and all procedures are followed. DVR shares information with vendors about available training that would support the development of skills relevant to the services they provide. Legislation in 2018 created a requirement that supported employment providers complete nationally recognized training or certification in supported employment, allocating funding to reimburse providers for associated costs.

- Strategy 3: Implement the Colorado LEAN process to assure a customer-focused, continuous improvement culture of operational excellence.

Progress: DVR has undertaken a LEAN initiative to improve processes within the agency. This effort lead to the development of a Process Improvement team which has focused on identifying duplication and inefficiency within DVR operations creating burden for DVR staff and delays for clients. A number of policy and procedural changes have been implemented as a result of this team's effort, which are expected to save staff time and assure the VR experience is positive, effective, and efficient for customers. These efforts are ongoing. Current projects include improved business process related to case documentation of the comprehensive assessment and Individualized Plan for Employment, refined fee structure and business processes for job placement services, review of eligibility process to improve timeliness, and the development of guidance and tools to support more efficient pre-employment transition services. Each of these projects are expected to be implemented before the end of Program Year 2019.

GOALS 4: Build and strengthen stakeholder relationships to increase employment opportunities for individuals with disabilities

- Strategy 1: Expand the involvement of DVR staff in regionally-focused sector partnerships to champion career pathways within business and industry for individuals with disabilities.

Progress: DVR staff are active on Colorado's State Technical Assistance team supporting the development of sector partnerships. Additionally, several BOS have been engaged in the development of sector partnerships across the state, including Retail. Healthcare, and Manufacturing. Several BOS are also regularly involved with planning and implementation of sector partnership events.

- Strategy 2: Align business outreach efforts with partner agencies to leverage the identification of employment opportunities and expand awareness of disability employment competency within the business sector.

Progress: DVR's BOS have been included into CDLE's broader Career and Business Services Team, and serve as a conduit to bring real-time LMI to their local teams through conversations with business and involvement with sector strategy initiatives. This team of BOS routinely provide disability awareness training to business partners throughout the state to improve awareness of disability employment within the business sector. DVR's Business Relations Unit Manager is a member of the Business and Career Services Executive Committee which is tasked with service alignment, partnership, policy review, and procedural implementation of best practices across Career and Business Services. In addition, DVR BOS and Workforce Business Development representatives across the state have developed and continue to enhance working partnerships for co-prospecting and delivery of business services.

Each year, DVR partners with CDLE's GPPR unit to promote National Disability Employment Month in October, ensuring greater visibility across stakeholders. This efforts included engaging stakeholders through social media, highlighting dual-customer successes through a series of video testimonials, and awarding annual "Shining Stars of DVR" awards to showcase several employers, clients, and service providers making strides in the employment of individuals with disabilities.

- Strategy 3: Explore the provision of technical assistance to businesses that are seeking to employ individuals with disabilities and as feasible, develop policies and processes to provide these services.

Progress: DVR has included services to employers within its service delivery policy, supporting these important services as being within the scope of service provision for DVR for both staff and stakeholders. DVR's Business Relations Unit (BRU) takes a lead in providing technical assistance and other services to the business community to support the employment of individuals with disabilities. The BRU reviewed and revised the goals and strategies for DVR business services, implementing an updated mission and vision of the unit effective May 2019. This work resulted in a streamlined focus to business within 4 key areas: recruitment; education; retention; and partnership. A variety of services and technical assistance are provided to businesses within these priorities. A new DVR Business Services Policy and Procedure Manual was also developed and implemented in summer 2019.

Goals Carried Over From Previous Plan

- DVR will have thirty day contact with all clients to increase client engagement and enhance the client-counselor partnership.
    - Based on feedback received from clients, staff, and stakeholders a requirement for meaningful contact every thirty days was determined to be unnecessarily burdensome. It did not achieve its desired effect of improving client engagement. Re-evaluating this requirement, led to a policy change requiring meaningful contact at least once every other month. This policy change has allowed for greater flexibility within the counselor relationship and supports client engagement while accounting for the unique circumstances and preferences of each eligible individual.
- DVR will improve case file documentation reflecting personalized and meaningful contact with clients,
    - DVR has maintained policies and procedures referenced in the prior State Plan that have led to improved case file documentation. DVR continues to monitor

the quality of case file documentation, providing coaching, training, and guidance to staff as necessary.

- DVR supervisors will meet regularly with counselors and staff to model excellent guidance and counseling skills as well as motivational interviewing so that counselors and staff can in turn use these skills with clients.
    - Additional training has been provided by Dr. Jared Schultz from Utah State University to support DVR supervisors in developing their clinical supervision skills. Dr. Schultz will continue to provide coaching to DVR supervisors as they support counselors to engage in effective counseling with those they serve.
- DVR will generate, monitor and use information to make sound fiscal decisions to ensure the ability to provide effective individualized services to clients.
    - DVR's leadership routinely utilizes a broad range of available data in order to make fiscal and programmatic decisions needed to ensure individualized client services. This team constantly monitors available information and adjusts strategies as needed to provide a seamless experience for clients.
- DVR will continue collaborative efforts and working relationships between local DVR offices and mental health centers and between local DVR offices and agencies serving clients with intellectual disabilities.
    - DVR maintains collaborative partnerships with both mental health centers and agencies serving individuals with intellectual disabilities.
- DVR will continue to work actively within the realm of education to assure that youth with the most significant disabilities are accessing career, transition and employment services, including supported employment.
    - DVR continues to work actively with education partners to assure youth have access to pre-employment transition, transition, and employment services, including supported employment.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

DVR made significant progress toward achieving all identified goals and priorities. However, these successes were not without challenges and DVR continues to work toward ensuring progress made is maintained and expanded moving forward. DVR experienced a high number of programmatic changes during the first two years of WIOA implementation. Many of these changes were necessary to improve program performance and accountability. Common change management challenges were present during this period of time, which had to be addressed as all strategies were implemented.

As DVR planned for the full implementation of the Workforce Innovation and Opportunity Act, as well as a change in the designated State agency from the Colorado Department of Human Services to the Colorado Department of Labor and Employment, effective July 1, 2016, DVR also experienced a high number priorities and projects which all needed to be carefully managed. While these factors complicated the achievement of goals and priorities, DVR made meaningful and significant progress in all areas and plans to maintain achievements made.

Throughout this time, DVR experience significant staff turnover at all levels, as well as several changes to organization structure and leadership. Despite shifting priorities, training new staff,

and managing staff vacancies, DVR made and continues to make substantial progress in all areas.

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

Supported Employment Goal: DVR will meet the needs of individuals with the most significant disabilities who need supported employment and will do so through collaboration with partner systems.

- Strategy: DVR will continue collaborative efforts and working relationships between local DVR office and mental health centers and between local DVR offices and agencies serving clients with intellectual disabilities.
    - Progress: DVR and the Office of Behavioral Health maintain a formal agreement that stipulates collaborative planning and coordination of services by local mental health centers and DVR offices. This agreement successfully drives local interactions that support enhanced service delivery and decreases duplicative service delivery. Local DVR staff and vocational staff from all twenty community center boards have developed collaborative referral and service delivery processes to identify individuals who are appropriate referrals for supported employment services through DVR. DVR will continue this strategy and will expand upon collaborative partnerships and agreements between DVR and local providers who serve clients with mental health concerns and intellectual disabilities.
- Strategy: DVR will continue to work actively within the realm of education to assure that youth with the most significant disabilities are accessing career, transition and employment services, including supported employment.
    - Progress: DVR CDE continue to support transition best practices within local school districts through the provision of onsite training, technical assistance, and facilitation regarding the provision of transition services to youth and students with disabilities, including those with the most significant disabilities. As DVR began to train and pilot Customized Employment, a local school district was included in the training in order to further develop expertise within education and demonstrate how customized employment services might be coordinated beginning when students are still in high school. CDE is an important partner as DVR continues to explore how to best develop a sustainable training approach to customized employment, including Discovery.

B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

DVR has strong collaboration with system partners to meet the supported employment needs of individuals with the most significant disabilities. DVR's partners at OBH experienced staff turnover, but this change did not significantly impede collaboration. Normal business fluctuations and challenges are experienced addressed by these teams and have not created substantive barriers to progress.

3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA

DVR has remained in a baseline period of performance for all performance measures under Section 116 of WIOA through PY19. DVR anticipates negotiating a performance target for the measureable skill gain measure beginning with PY20, with additional targets negotiated in subsequent years.

During this baseline period of period, DVR has been working with the developers of its electronic case management system, as well as DVR staff, to refine data collection and reporting to ensure accurate data is available to meet performance reporting requirements.

For PY18:

Measure	Target	Result
Employment Rate in the 2nd Quarter after Exit	NA	58.2%
Median Earnings in the 2nd Quarter after Exit	NA	$3695.79
Employment Rate in the 4th Quarter after Exit	NA	55.7%*
Measurable Skill Gains Rate	NA	21.3%
Credential Attainment Rate	NA	27.4%*

*Preliminary data not available on the RSA-9169

4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED

Total expenditures of Title I funds for innovation and expansion activities for PY18 were as follows:

Support of the State Rehabilitation Council (SRC): For PY2018, the SRC had an operating budget of $30,000. The budget was developed to be used for SRC meetings, SRC travel, meeting expenses, including expenses for committee meetings and the SRC retreat, printing and materials and contract expenses. During PY2018, the SRC expended $16,058.65.

Support of the State Independent Living Council (SILC): For PY2018, the SILC had an operating budget of $48,000. The budget was developed to be used for professional services, SILC travel, meeting accommodations, operating costs, conference calls, membership dues and fees, and the State Plan for Independent Living (SPIL) needs assessment. During PY2018, the SILC expended $51,018.42.

DVR's Youth Transition Unit enhances transition activities and ensures DVR is implementing effective transition services to students and youth with disabilities. This unit continues to evolve, with regional lead counselors assigned throughout the state to provide technical assistance and training to DVR staff and education partners at the local level to ensure effective transition practices. DVR's Process Improvement Effort (PIE) and strategic planning activities since 2018, highlighted a need for further development of this unit to best meet the needs of students and youth, ad discussed in section o.8.B. Developing and implementing innovative approaches to providing transition services are incorporated into ongoing administrative activities of this uni; as such, associated costs have not been explicitly identified as innovation and expansion.

DVR's Blind and Low Vision Services Unit is now well established and is responsible for improving the availability and effectiveness of rehabilitation services to the blind and those with low vision. The creation of this unit allowed DVR to further develop counselors, vision rehabilitation therapists, and orientation and mobility specialists in order to most effectively meet the unique needs of individuals with visual impairments. A variety of DVR's stakeholders have acknowledged this organizational structure has proven effective in improving services to individuals who are blind or have low vision, resulting in a formal commitment from DVR to maintain this structure. Developing and implementing innovative approaches to providing VR services to individuals who are blind and have low vision are incorporated into ongoing administrative activities of this unit; as such, associated costs have not been explicitly identified as innovation and expansion.

As discussed in section o.8.B., DVR's Office of Independent Living Services is responsible for overseeing and coordinating independent living by working in close partnership with each of the Centers for Independent Living (CIL) in Colorado. The support available from the Office has enhanced independent living services available throughout the state and assisted the CILs to identify innovative and promising practices that can be adapted to meet the needs of various communities in Colorado, including expanding the services provided to students and youth with disabilities. Developing and implementing innovative approaches to support the CIL system are incorporated in ongoing administrative activities of this uni; as such, associated costs have not been explicitly identified as innovation and expansion.

DVR take a comprehensive approach to using data to drive the management of the VR program. DVR has increased its capacity to identify, gather, and analyze critical data to improve services and outcomes for clients, while ensuring the accountability and credibility of VR to all stakeholders. DVR intends to continue this approach of metrics driven leadership to further enhance performance management, quality assurance, and outcomes. The development and comprehensive use of data are incorporated in ongoing administrative activities of DVR; as such, associated costs have not be explicitly identified as innovation and expansion.

DVR has completed a LEAN initiative to identify areas of unnecessary administrative burden and streamline processes with the goal of improving the experience of both staff and customers. This work resulted in significant reduction of staff time engaged in unnecessary administrative tasks and some targeted work will continue in the area of pre-employment transition services as described in section o.8.B. DVR expeded $115,700 in salary costs associated with coordinating this effort.

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

DVR continues to provide a wide range of supported employment services to individuals with the most significant disabilities for whom employment has not traditionally occurred or has been interrupted or intermittent and who need supported employment services and extended support services to attain and maintain competitive integrated employment.

Any other necessary vocational rehabilitation service may also be provided to prepare and support the individual in supported employment. Such services include, but are not limited to, physical and mental restoration services; work adjustment and other vocational or academic training; occupational licenses, tools and equipment; specialized services for the blind and/or

deaf; and support services, such as maintenance, transportation, services to family members, and personal assistance services.

DVR uses Title I (Vocational Rehabilitation Services) and, when available, Title VI-B (Supported Employment Services) case service funds to provide supported employment services for individuals with the most significant disabilities. The resources available through the Title VI-B program are used only to provide supported employment services, as identified in the Individualized Plan for Employment (IPE), to assist eligible individuals with the most significant disabilities to obtain and secure competitive integrated employment.

To ensure supported employment services are meeting an individual's employment goals, the DVR counselor documents the individual's weekly work goal, job stabilization criteria, the supported employment services to be provided, the type and frequency of monitoring contacts, and a description of extended services needed. While extended services are most often coordinated with another community provider and funding source, DVR's policy does allow for DVR to provide these services for up to four years for youth with disabilities. Currently, Medicaid funding for extended services is limited to individuals who qualify for an HCBS I/DD waiver or receive services community behavioral health centers. For individuals who do not have access to these extended services, local teams carefully explore other options, such as Social Security work incentives, private pay, and natural supports.

Effective supported employment services require collaboration with a variety of partners and service providers. To this end, DVR has cultivated extensive partnerships with the Colorado Department of Health Care Policy and Financing's (HCPF) Office of Community Living (OCL) and the Colorado Department of Human Services' (CDHS) Office of Behavioral Health (OBH), along with various community partners and supported employment service providers to improve supported employment services. Also involved in this effort is the Employment First Advisory Partnership, an inter-departmental and stakeholder advisory group recommending policy and strategic initiative to ensure competitive integrated employment is the first and preferred choice for working age adults with disabilities. While all partners are committed to the availability of high quality supported employment services, systematic barriers have been identified and all partners are exploring strategies to improve the system.

For example, concern regarding the skills and qualifications of supported employment providers is being addressed, in part, through the implementation of Senate Bill 18-145, which requires supported employment service providers to complete nationally recognized training or obtain nationally recognized certification in supported employment. The legislation included funding to reimburse providers for the costs associated with completing the required training or certification. While this legislation is early in its implementation, it is hoped that consistency in provider qualifications will ensure a baseline knowledge of supported employment and lead to more effective service delivery. Additional concerns about the reimbursement rate structures for supported employment services have also been raised as a barrier to more effective service delivery. DVR and other partners will continue to explore and evaluate potential strategies to combat these barriers, in partnership with the new Colorado Office of Employment First.

As described elsewhere in the State Plan, DVR has recently begun implementing customized employment. DVR received additional funding to expand training in customized employment and is currently exploring options for ensuring a sustainable training approach to build system capacity. Individual Placement and Supports (IPS) is implemented by most community mental health centers providing supported employment services and this model is continuing to expand in Colorado, including a current pilot to develop a program specializing in implementing IPS with individuals with dual diagnoses.

DVR is also committed to providing supported employment services to Colorado's youth. Local offices coordinate with transition staff to support timely referrals of students with most significant disabilities to DVR prior to their completion of the high school transition program. DVR also coordinates services with the Mental Health Center of Denver in their Emerson St. Program for Teens and Young Adults. As a result, DVR has not had difficult expending 50% of its Title VI B funds on youth with disabilities.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES

Supported employment services provided are provided for up to 24 months unless the team has determined that more time is necessary for the individual to achieve job stability before transitioning to extended services. In these cases, the Individualized Plan for Employment (IPE) can be amended to provide additional supported employment services to achieve the weekly work goal and/or stabilize employment. The counselor works with the individual and his or her interdisciplinary team to determine when job stability has been achieved based on whether the individual can and is reasonably expected to continue to perform all job duties acceptably. The timing and flexibility of the transition process is critical to ensure that the individual's placement is not jeopardized once the job coach fades from the job site. Upon transitioning to extended services will begin, the counselor will continue to monitor the employment for an additional 90 days to ensure the individual remains stable with this level of support. Training and technical assistance continue to be provided to counselors and other service providers on how to identify the appropriate time to fade job coaching services and when extended support services, including natural supports, should begin. DVR and the Office of Behavioral Health have developed written guidelines for mental health centers, which provide supported employment services to eligible individuals with serious mental illnesses, to clarify their role in the provision and funding of extended services.

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

Colorado Department of Labor and Employment

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

Division of Vocational Rehabilitation

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

Kristin Corash

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

Director

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	Kristin Corash
Title of Signatory	Director
Date Signed	February 24, 2020

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)	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 under the VR	No

The State Plan must include	Include
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 disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)	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	

The State Plan must include	Include
4.g. Provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act	
4.h. Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by 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 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	

The State Plan must include	Include
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	
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 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Median Earnings (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	21.3%	21.3%	21.3%	22.0%
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

"Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF)

A. CONDUCT A PROGRAM DESIGNED TO SERVE ALL POLITICAL SUBDIVISIONS IN THE STATE (NOT NECESSARILY IN A UNIFORM MANNER) THAT PROVIDES ASSISTANCE TO NEEDY FAMILIES WITH (OR EXPECTING) CHILDREN AND PROVIDES PARENTS WITH JOB PREPARATION, WORK, AND SUPPORT SERVICES TO ENABLE THEM TO LEAVE THE PROGRAM, SPECIFICALLY CASH ASSISTANCE, AND BECOME SELF-SUFFICIENT (SECTION 402(A)(1)(A)(I) OF THE SOCIAL SECURITY ACT)

The Colorado Combined State Plan is effective July 1, 2020. Colorado's TANF program is known as Colorado Works and is designed to assist families in becoming stable and self-sufficient, reducing the need for the social safety net due to positive outcomes, particularly employment. The Colorado Works program is administered by the Colorado Department of Human Services, Office of Economic Security, Employment and Benefits Division in a State supervised, county administered system. Colorado values engaging low-income families in services and strategies that result in meaningful, self-supporting employment as the best strategy for promoting long-term well-being for those in poverty. In addition to the core function of the safety net, Colorado Works promotes job preparation, successful transition to and progression in work, and develops strategies and policies that ensure participants are engaged in an individualized and outcome-oriented plan that promotes well-being and economic security.

The Colorado Works program, in its design, also promotes capacity building and preventative measures to strengthen families, provide for positive youth development and healthy relationships. The Colorado Works program operates in all counties in Colorado and is administered locally by county departments of human/social services, per State statute. Each county enters into a performance memorandum of understanding with CDHS and has written county policies describing its program. CDHS is responsible for ensuring that all counties comply with the terms of their county policies, as well as with all federal and State statutes and regulations. County departments of human/social services have flexibility in determining the most effective approach for accomplishing the four federal purposes of TANF within their local area and within the parameters established by the State and federal government, including the authority to contract all or part of the program operation to private and/or public providers. Counties develop their program policies to deliver the most appropriate services to eligible participants in their communities. All local program policies must meet federal and State statutory and regulatory requirements.

In addition to the services and investments made by counties through implementation at the local level, CDHS is committed to supporting programs throughout the State that serve low-income families and that are designed to meet one of the four purposes of TANF. CDHS also administers the Personal Responsibility and Education Program (PREP) grant, which provides comprehensive and medically accurate sexual health education to teens.

Eligibility Criteria, Benefit Levels and Services

Colorado Works statutes state that no individual is entitled to benefits or services under the Colorado Works program. Colorado Works provides fair and equitable treatment to all applicants and participants and does not discriminate based on age, disability, race, color or national origin, or any other basis prohibited by law.

Basic cash assistance: Colorado Revised Statutes set uniform statewide basic eligibility and minimum benefit levels for basic cash assistance based on Aid to Families with Dependent Children (AFDC) rules that were in effect on July 16, 1996, with the following exceptions:

1. Families do not have to include half siblings in the same assistance unit if at least one of the half siblings is receiving child support;
2. Sixty seven percent of a participant's income is disregarded for ongoing benefit calculation;
3. All wages earned in subsidized employment are exempted from eligibility determination and grant calculation pursuant to C.R.S. 26-2-706.9 (9) (d) and C.R.S. 26-2-709 (1) (II);
4. Two parents are treated the same as single parent families however; cash assistance is paid using State-only funds; and,
5. A family's resources are exempt.

Eligibility criteria for cash assistance also include the following:

1. Colorado does not impose a family cap;
2. Colorado does require the participant to work with child support services, to ensure child(ren) receive financial supports. Colorado does require the assignment of child support rights as a condition of eligibility for Colorado Works;
3. Colorado does not impose different eligibility criteria or benefit levels on families moving into Colorado from other states;
4. Expectant parents that can prove pregnancy are eligible; and,
5. All work eligible individuals must sign and participate in an individualized plan for employment.

The following persons shall be ineligible for all Colorado Works benefits or services:

1. Fugitive or fleeing felons, parole violators, or probation violators;
2. Specified caretakers who fail to report, without good cause within normal program reporting requirements, a child(ren) who is expected to be out of the home for longer than forty-five (45) calendar days, will be ineligible for assistance for ninety (90) calendar days from the date that it is determined he or she should have reported the expected absence;
3. Persons convicted of a drug-related felony on or after July 1, 1997, unless the county department has determined that the person has taken action toward rehabilitation, such as, but not limited to, participation in a drug treatment program;
4. Assistance units with an adult participating in a strike; and,
5. Qualified legal non-citizens or those who are not federally exempt, who entered the United States on or after August 22, 1996, are ineligible for cash assistance for five (5) years from date of entry into the United States.

In addition to the basic cash assistance grant, county departments of human/social services may provide other assistance in the form of additional benefits, services, and incentives to participants above the basic benefit level, as outlined in their county policy.

Dependent child(ren) must live with a specified caretaker; except for child(ren) receiving family preservation services or child(ren) receiving services as outlined in Colorado's approved Title IV-A State Plan in effect as of September 30, 1995. A specified caretaker is a person who exercises responsibility for the child and may or may not be related to that child.

To receive benefits, an assistance unit may consist of the dependent child, siblings of the dependent child, and specified caretaker (such as parents or grandparents, etc.). A dependent child is a child under age 18 or between 18 and 19 who is expected to graduate from high school prior to his/her 19th birthday.

Every household receiving TANF assistance is raising a child. There are three primary family types receiving Colorado Works assistance:

- Two parent households or single parent households with at least one child (including pregnant women without other children)
- Child(ren) living with a caretaker where the child(ren) and the caretaker are also receiving benefits
- Child(ren) living with a caretaker whereby benefits are to support the child(ren), but not the adult(s) in the household (referred to as Child-only participants)

Persons living in the household who are financially responsible for members of the assistance unit, but who are not required to be in the unit, will have their income, minus the employment disregard, deemed available to the family unit. The income disregard at initial application is $90; once eligibility has been established, 67% of income will be disregarded during the certification period (up to six months). The generous disregard after eligibility has been determined is intended to support a transition to employment for families receiving assistance, allowing access to not only basic cash, but also case management and supportive services that are critical during early attachment to work.

Services are provided to child(ren) in out of home placements or in juvenile justice facilities in accordance with the provisions of the approved Emergency Assistance State Plan in effect on September 30, 1995. Non-monetary services may also be provided to a non-custodial parent according to program rules, as outlined in county policy.

Specified caretakers are required to notify the agency within normal program reporting requirements if a child has left the home and is expected to be gone for more than 45 calendar days. Specified caretakers who fail to meet this requirement will be ineligible for assistance for ninety calendar days.

Good Cause exceptions for temporary absence include:

1. Child(ren) receiving medical care or education that requires him or her to live away from the home; or,
2. Child(ren) visiting a noncustodial parent, as specified in a parenting plan entered by the court or by both parties not to exceed six (6) months unless otherwise specified and must be signed by both parties; or,

3. Child(ren) residing in voluntary foster care placement for a period not expected to exceed three (3) months. Should the foster care plan change within three months and the placement become court-ordered, the child is no longer considered to be living in the home as of the time the foster care plan is changed.

Applications and redeterminations of eligibility: Applications for Colorado Works benefits must be processed within 45 calendar days. For persons receiving ongoing basic cash assistance, a redetermination of eligibility must be completed every six months. Redeterminations for Colorado Works benefits must be completed by the last day of the month if submitted prior to the 15th of the redetermination month and must be completed by the 10th of the month following the redetermination month if received after the 16th of the redetermination month.

Method and frequency of basic cash assistance. Assistance units are certified as eligible and receive benefits through a six-month certification period, notwithstanding changes to household composition or income that would render the unit ineligible entirely. The Certification Period aligns with the State's Food Assistance simplified reporting rules; families are required to report changes as they occur, including changes to household composition, income (source or amount, earned or unearned), or residence.

Changes that do not render the unit ineligible will not negatively affect benefits during the certification period. Changes that would increase the assistance amount will be applied and acted upon as they are reported, irrespective of the certification period. All other reported changes take effect at the beginning of the next Certification Period.

Time limits: Adult members of the assistance unit are limited to 60-months of TANF assistance during their lifetime. Up to 20% of the caseload may receive an extension of federal TANF assistance beyond the 60-month lifetime limit if their cases meet hardship or domestic violence criteria. No extensions will be formally granted until the adult has received TANF benefits for 60-months. All extensions will be granted by the county department of human/social services based on hardship or domestic violence reasons defined in Colorado Works rules and county policies. Domestic violence extensions and hardship extensions may be granted when domestic violence or hardship problems prevent the adult(s) from participating in work activities or securing employment. Hardship reasons for extensions beyond the 60-month time limitation include the following:

1. Disability of the caretaker, his/her spouse, the dependent child(ren), or immediate relative for which the caretaker is the primary caregiver;
2. involvement in the judicial system because a member of the assistance unit has an existing case;
3. family instability, including the proven inability to maintain stable employment or inability of the caretaker to care for child(ren) in his or her own home or in the home of a relative;
4. inadequate or unavailable child care, housing, transportation, or employment opportunities;
5. families experiencing current or past domestic violence issues; and,
6. other hardship reasons specified in the county's policies.

Minor parents: A minor parent is a parent who is under age 18. All unmarried minor parents are considered child(ren) for purposes of time limits and budgeting. Unmarried minor parents must live with a parent or adult relative or guardian, or in a setting deemed appropriate by the county, with exceptions for good cause. Minor parents who have not completed high school or its equivalent must attend high school, work on a GED, or be in an alternative education training program approved by the State in order to be eligible for assistance unless receiving benefits paid with segregated State/local funds. Colorado does not require non-custodial, non-supporting minor parents to fulfill community work obligations or attend appropriate parenting classes after school.

Tribal Eligibility: Members of Indian tribes who live in Colorado and are not eligible for assistance under a Tribal Family Assistance plan approved under Section 412 of the Social Security Act could be eligible for Colorado Works. Any month of receipt by an adult while living in Indian Country or a Native Alaskan Village where at least 50 percent of the adults are not employed shall not count towards the 60 cumulative months of assistance. Indian Country is defined in Section 1151 of Title 18, Part 1, Chapter 53, United States Code, as of January 6, 1999.

Sanctions: Sanctions are imposed on Colorado Works recipients who do not participate in or otherwise violate the terms and conditions agreed upon in the individualized plan. Sanctions apply to the full family. Before sanctions take effect, the county office must attempt conciliation with the participant. Good cause may be granted, and benefits will not be sanctioned. If conciliation is not successful, the sanction process will ensue, as follows:

1. The first sanction shall be twenty-five percent (25%) of an assistance unit's cash assistance for a period of one month. The first sanction shall remain in effect until cured and served. Sanctions not cured by the end of the sanction period shall progress to the second sanction.
2. The second sanction shall be fifty percent (50%) of the cash assistance for one month, and shall remain in effect until cured and served. Second sanctions not cured within the sanction period shall progress to the third sanction.
3. The third sanction shall result in the termination of cash assistance to the assistance unit for a period of three months.
4. A full case closure for a period of one month can occur for complete refusal to participate in or comply with the entire individualized plan.

The sanction period is determined by the State Board of Human Services. Once a participant reaches the third sanction, all subsequent sanctions are at the third level.

Disqualifications: Persons who are required members of the assistance unit, but are disqualified or excluded from receiving Colorado Works basic cash assistance or diversion due to program prohibitions or violations, shall be removed from the assistance unit.

1. Individuals who commit fraud will be removed from the grant for a 12-month period for the first offense, 24-months for the second offense, and permanently for the third offense.
2. Individuals who misrepresent information in order to receive assistance in two states at the same time will be ineligible for a period of ten years.
3. Individuals who are fugitive or fleeing felons, parole violators, or probation violators.
4. Individuals who have been convicted of a drug-related felony on or after July 1, 1997, unless the county has determined that the person has taken action toward rehabilitation.
5. Individuals who have failed to apply for a Social Security Number.
6. Individuals who are non-citizens and do not meet the definition of a qualified legal noncitizen.

Overpayments and recoveries: All overpayments are promptly established as account receivables unless:

1. The household members are without fault in the creation of the overpayment,
2. The change in income or other circumstances were reported timely, and
3. The recovery would deprive the household of income required for ordinary and necessary living expenses or would be against equity and good conscience. The definition of against equity and good conscience must be consistently defined in county policy. The fact that the recipient is receiving public assistance shall not be the only factor in making a determination that the person would be deprived of income required for ordinary and necessary living expenses or that equity and good conscience exist.

A county will not pursue collection of overpaid benefits from individuals who were dependent child(ren) in the overpaid Colorado Works case.

A. For individuals actively receiving assistance, the Monthly Recovery Reduction Amount is as follows:

1. If the error is a result of an agency error compute five percent (5%) of the authorized payment amount or, if the error is result of a client error, compute ten percent (10%) of the authorized payment amount. If the resulting percentage amount is less than ten dollars ($10), the deduction from the authorized payment amount shall be ten dollars ($10).
2. Deduct the percentage amount, or ten dollars ($10) when the percentage amount is less than ten dollars ($10), from the authorized payment to arrive at the payment amount. This amount shall be rounded to the next lower whole dollar amount, if not already a whole dollar amount. This rounded amount is the final payment amount.
3. When recovery deductions reduce the payment amount to less than ten dollars ($10), such lesser amount shall be paid except when that amount is less than one dollar ($1.00) in which case no payment is made and that month shall not count towards the recipient's federal TANF time limit. The client shall continue to receive services as applicable.

4. When the authorized payment amount is less than ten dollars ($10), no deduction shall be made from such “no payment” case.

5. When recovery deductions reduce the payment amount to less than one dollar ($1.00) and as a result no payment is made, such case shall not be considered to be an active Colorado Works case.

6. When recovery is due to a fraudulent action on the part of the recipient and interest may be added thereto in accordance on the part of the recipient, the interest amount shall not be included in the payroll deduction unless the recipient agrees to such inclusion. If the recipient does not so agree, the interest amount shall be collected.

7. The amount of recovery deduction shall be recorded in the recipient’s case file and collected via the statewide benefit management system.

8. Previously established claims will be deducted from cash assistance under the Colorado Works program in accordance with the AFDC Recoupment policy.

9. Claims shall not be collected against supportive services and/or other assistance payments unless such claim is due to fraud and/or IPV claims.

B. For overpayments to non-active cases, the county shall establish a monthly repayment plan with the family which shall be no more than ten percent (10%) but no less than five percent (5%), of the family’s gross income or an amount defined by the recipient in excess of ten percent (10%), or the amount can be paid in full unless hardship is established.

Non-recurrent, short-term benefits: Colorado offers non-recurrent, short-term benefits and services to its Colorado Works participants in two forms - state diversion and county diversion.

1. A “state diversion” is a needs-based, cash or cash-equivalent payment made to a participant who is eligible for basic cash assistance;

2. A “county diversion” is a needs-based, cash or cash-equivalent payment made to a participant who is eligible for assistance pursuant to the maximum eligibility criteria for non-recurrent, short-term benefits established in the State plan, in the county-defined expanded eligibility based on federal poverty and other standardized guidelines, and in county policies.

(A) Eligibility for Colorado Works county optional benefits and service requires:

1. A family consisting of child(ren) living with a specified caretaker or parent(s) with unborn child(ren); and,

2. The family’s gross income is within the county limit, up to $75,000 per year.

Notwithstanding the above eligibility requirements, all Colorado residents are eligible to receive services intended to reduce out-of-wedlock pregnancies and/or encourage the formation and maintenance of two-parent families if paid exclusively with federal TANF funds. The federally funded Personal Responsibility Education Program intends to decrease teen pregnancies through the implementation of evidence-based comprehensive sexual health education curriculum. The grant requires additional programming to focus on three federally outlined Adult Preparation Subjects: healthy life skills, healthy relationships, and adult/child communication.

Additional Colorado Works Benefits and Services: Other benefits and services include, but are not limited to, the following:

1. Colorado allows county departments to use Colorado Works funds to provide vouchers for State approved job placement agencies.
2. Colorado provides family planning services not available through Medicaid.
3. Colorado provides employment incentives to participants or employers as determined necessary by county policy.
4. Colorado screens for domestic violence as a part of the assessment process but will only exempt domestic violence victims from time limits and other requirements for work participation when indicated by the assessment, not as a standard practice. Colorado refers domestic violence victims for needed services. Colorado is meeting the requirements for the federally approved domestic violence waiver.
5. Colorado meets the needs of the refugee population through the Colorado Refugee Assistance Program (CRSP) utilizing Colorado Works funding.
6. Colorado promotes responsible fatherhood through evidence-based responsible parenting and relationship education programs.
7. Colorado offers subsidized employment programs for both custodial and non-custodial parents that are TANF eligible. The Colorado Works Subsidized Employment and Training Program (CW STEP) is one example. The program assists Colorado Works recipients to attain living-wage, permanent jobs through employment opportunities with subsidized wages, including apprenticeships, on-the-job training, transitional jobs, and paid internships.

Non-citizens: Non-citizens, who entered qualified non-citizen status on or after August 22, 1996 and have been in the country for five or more years, are eligible for TANF funds in accordance with Section 402 (b) of the Act. Colorado pays TANF assistance to excepted qualified non-citizens as required by Title IV of PRWORA. Victims of severe forms of trafficking are eligible for federally funded TANF benefits to the same extent as refugees. Counties may assist 1) unexpected qualified aliens who arrived on or after August 22, 1996 and have been in this country less than five years and 2) aliens lawfully present who would be eligible for TANF but for Title IV of PRWORA with segregated State/local funds.

Refugees: Refugees and other eligible populations (45 CFR 400.43) are qualified aliens exempt from the five-year bar. Refugees eligible for assistance through Colorado Works submit an application through their county of residence. The State provides its Refugee-TANF (Colorado Works) population assistance and services by utilizing county departments and the Colorado Refugee Services Program. County departments are charged with the responsibility of Colorado Works eligibility determination, and CRSP, through its contractors, with case management and service provision responsibilities, which may include workforce development. The model implemented by the State helps ensure all services for refugees are culturally and linguistically appropriate. This model is dependent on the leveraging of TANF funds that support the work of CRSP and its contractors.

Through the assessment process, CRSP determines the most appropriate way to serve refugee families. Consistent with all families accessing Colorado Works benefits, the assessment is used to determine if either a monthly grant or a non-recurrent short term benefit is most appropriate based upon family circumstances.

Family preservation: The Family Preservation Program replaced the IV-A Emergency Assistance Program that was administered by the child welfare. This program utilizes segregated federal TANF funds to provide services to families where the child(ren) are at risk of out-of-home placement. These services are designed to ensure that child(ren) can be cared for in their own homes or in the homes of caretaker relatives, and include case planning, case management, counseling, family support programs, intensive family therapy, day treatment, home-based services, non-medical drug and alcohol treatment, and crisis intervention services.

Eligibility for Family Preservation is as follows:

1. The family income must be under $75,000 yearly; and,
2. The child must meet out-of-home placement criteria; and,
3. The child lived with a specified relative within the last six months.

B. REQUIRE A PARENT OR CARETAKER RECEIVING ASSISTANCE TO ENGAGE IN WORK (DEFINED BY THE STATE) ONCE THE STATE DETERMINES THE PARENT OR CARETAKER IS READY TO ENGAGE IN WORK, OR ONCE HE OR SHE HAS RECEIVED 24 MONTHS OF ASSISTANCE, WHICHEVER IS EARLIER, CONSISTENT WITH THE CHILD CARE EXCEPTION AT 407(E)(2) (SECTION 402(A)(1)(A)(II) OF THE SOCIAL SECURITY ACT)

Assessment and Individualized Employment Plans: All applicants for Colorado Works are assessed no later than 30 days after the application date. The initial assessment focuses on identifying what services and assistance will support the family in achieving economic stability, and are particularly centered on obtaining meaningful employment. All assessments, both initial and ongoing, are individualized and include formal and informal evaluations to determine strengths and challenges to obtaining economic stability, such as recent work history and skills, education level, needs of the assistance unit, and other relevant factors. Counties may utilize specialized assessment tools, such as those for substance abuse or vocational interest, depending upon the circumstances of the family, in order to fully develop a suitable and individualized plan. All plans identify a goal for lasting economic security, and are intended to support not only the process components of work participation and verification, but the attainment of a long-term outcome or goal. Strategies and accommodations to address challenges are included in the individualized plan developed from the assessment, and roles are clearly delineated. A contract between the work eligible individual(s) in the family and the county agency focuses on each party's responsibilities, and clearly states the terms and conditions of benefit receipt. The specific actions, activities, goals, and supports needed are outlined in the individualized plan. Whether assistance is one-time (diversion) or recurrent (basic cash assistance), a plan is developed and agreed to by both the participant and the county human service department.

Colorado places a strong emphasis on employment as the most likely path to economic stability for families in need of assistance, and as such, works closely with existing agencies at the State and county levels to ensure service integration and innovative practices. This includes partnerships with the State's Division of Vocational Rehabilitation, Workforce Investment

Board, Department of Labor and Employment, Department of Higher Education and Community Colleges, and local workforce and education partners.

Work Eligible Individuals: Work eligible individuals are identified through logic in the Colorado Benefits Management System (CBMS), which is the State's eligibility and work program tracking system for Colorado Works participants, as well as other public assistance. Colorado does not employ separate state programs under TANF and has executed sanctions since PRWORA was signed into law in 1996. Non-recipient parents are not considered work eligible individuals in Colorado for reasons outlined in the TANF Final Rule, such as non-citizen status and minor parents who are not a head of household. Colorado does not include SSI/SSDI recipients in the work participation rate calculations. CBMS identifies cases where a parent is caring for a disabled family member and should not be categorized as a work eligible individual. County departments are trained and formally advised of the need to document medical verifications in the case file for this purpose. Medical verification will be updated at each redetermination of Colorado Works eligibility, or before, if warranted. A family member for the purpose of this coding is considered to be any person living in the household who is dependent on the work eligible individual(s) for care and receiving financial support.

C. ENSURE THAT PARENTS AND CARETAKERS RECEIVING ASSISTANCE ENGAGE IN WORK IN ACCORDANCE WITH SECTION 407 (SECTION 402(A)(1)(A)(III) OF THE SOCIAL SECURITY ACT). CONSISTENT WITH THE REQUIRED STRATEGIC ELEMENTS DISCUSSED IN SECTION II (A)(2) HEREIN, PROVIDE A SPECIFIC ANALYSIS OF HOW THE STATE'S WORKFORCE DEVELOPMENT ACTIVITIES ARE ADDRESSING EMPLOYMENT AND TRAINING SERVICES FOR PARENTS OR CARETAKERS RECEIVING ASSISTANCE

Work participation: All work eligible individuals engage in an individualized plan, and as such, participate in a State or county defined work activity. Exception is made for those with a domestic violence waiver or for single parents with a child under age six for whom childcare is unavailable. Single parents with a child under age one are not exempt, unless specified by county policy.

Failure to engage in the individualized plan components and activities without good cause will result in sanction, as described in the sections of this plan on "sanctions" and "disqualifications". Colorado considers childcare unavailable if childcare is inaccessible, unaffordable, or unsuitable as defined in each county policy. All participants are notified in writing of the criteria for this exemption, how to apply for the exemption, and the effect of this exemption on time limits.

Work activities, good cause for failure to participate and definition of ready to work: Colorado utilizes the federally defined work activities as the building blocks of an individualized plan that is outcome-based. Federally defined work activities are considered a means to an end, but not the end itself. As such, Colorado has implemented a statewide Employment Entry performance measure for the Colorado Works program, and provides guidance to counties on how to best utilize work activities to support and promote an employment goal. Per the State's Work Verification Plan (WVP), all federally recognized work activities are used in Colorado, save the provision of childcare for another recipient in community services. Colorado adheres to the federal requirements around work participation and verification, and has consistently met the State's work participation rate since 1996. Please see the WVP for a detailed list of activities, hours, and verification requirements.

Good cause for not engaging in work activities is determined at the county level, in accordance with federal and State guidelines. County departments utilize assessments, interviewing skills,

and case management to support families in the goal of self-sufficiency, and determine together with the participant what activities best support their individualized plan. Case management is ongoing, allowing for the adaptation of the individualized plan over time and as circumstances change; Colorado employs a model of the Colorado Works program that is strengths-based and customer-centered. Counties are encouraged to engage program participants in a manner that stabilizes and supports the family, reserving sanctioning as a final resort after conciliation is unsuccessful.

Job ready is defined locally and outlined in county policies; Colorado has found that being ready to work is fluid and looks different family-to-family, and is committed to working with customers where they are at. Counties are encouraged to think about mid- to long-range planning for economic stability, implementing strategies that protect against recidivism because those who are exiting are truly more economically stable and no longer need the support of the program. In this vein, work ready is considered not only the ability to get work tomorrow, but also the ability to maintain and succeed in employment over the long-term.

Provisions of the Patient Protection and Affordable Care Act (PPACA):

Other Specialized Training: Colorado assists individuals to train for, seek and maintain employment to provide direct care in a long-term care facility and in other occupations related to elder care determined appropriate by the State for which Colorado identifies an unmet need for service personnel.

D. TAKE SUCH REASONABLE STEPS AS THE STATE DEEMS NECESSARY TO RESTRICT THE USE AND DISCLOSURE OF INFORMATION ABOUT INDIVIDUALS AND FAMILIES RECEIVING ASSISTANCE UNDER THE PROGRAM ATTRIBUTABLE TO FUNDS PROVIDED BY THE FEDERAL GOVERNMENT (SECTION 402(A)(1)(A)(IV) OF THE SOCIAL SECURITY ACT)

Confidentiality: All applicant or recipient information is confidential and available only for the purposes of the effective administration of the program and will be made available to federal or State agencies as appropriate. Recipient information is made available to the State Department responsible for voter registration to ensure the opportunity to vote is afforded to all adults participating in the program. All employees are trained to maintain the confidentiality of information and are notified that failure to do so will result in dismissal. All parties acting on behalf of the county department must be employees or contractual agents. County departments of human/social services contracting for program administration or services are required to include confidentiality requirements in their contracts. County departments of human/social services administering the program are required to include procedures to ensure confidentiality in their policies.

E. ESTABLISH GOALS AND TAKE ACTION TO PREVENT AND REDUCE OUT-OF-WEDLOCK PREGNANCIES, WITH SPECIAL EMPHASIS ON TEENAGE PREGNANCIES (SECTION 402(A)(1)(A)(V) OF THE SOCIAL SECURITY ACT)

Colorado has established goals and taken action to prevent and reduce the incidence of out-of-wedlock pregnancies, with special emphasis on teenage pregnancies, and established numerical goals for reducing the illegitimacy ratio. Colorado works with county departments of human/social services and educational and health agencies to reduce the out of wedlock birth rate, with a special emphasis on teenage pregnancies. Specifically, all Colorado residents are eligible to receive services intended to reduce out-of-wedlock pregnancies and/or encourage the formation and maintenance of two-parent families if paid exclusively with federal TANF

funds. The federally funded Personal Responsibility Education Program (PREP) intends to decrease teen pregnancies through the implementation of evidence-based comprehensive sexual health education curriculum. The grant requires additional programming to focus on three federally outlined Adult Preparation Subjects: healthy life skills, healthy relationships, and adult/child communication.

F. CONDUCT A PROGRAM DESIGNED TO REACH STATE AND LOCAL LAW ENFORCEMENT OFFICIALS, THE EDUCATION SYSTEM, AND RELEVANT COUNSELING SERVICES, THAT PROVIDES EDUCATION AND TRAINING ON THE PROBLEM OF STATUTORY RAPE SO THAT TEENAGE PREGNANCY PREVENTION PROGRAMS MAY BE EXPANDED TO INCLUDE MEN (SECTION 402(A)(1)(A)(VI) OF THE SOCIAL SECURITY ACT)

Colorado's programs and services to prevent and reduce the incidence of out-of-wedlock pregnancies includes coordination with local law enforcement personnel, representatives of counseling services in the counties, and the education system provide training regarding statutory rape education to males and females alike. Efforts are made to get law enforcement personnel and judicial personnel to impose stricter enforcement of the statutory rape laws.

G. IMPLEMENT POLICIES AND PROCEDURES AS NECESSARY TO PREVENT ACCESS TO ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART THROUGH ANY ELECTRONIC FUND TRANSACTION IN AN AUTOMATED TELLER MACHINE OR POINT-OF-SALE DEVICE LOCATED IN A PLACE DESCRIBED IN SECTION 408(A)(12), INCLUDING A PLAN TO ENSURE THAT RECIPIENTS OF THE ASSISTANCE HAVE ADEQUATE ACCESS TO THEIR CASH ASSISTANCE (SECTION 402(A)(1)(A)(VII) OF THE SOCIAL SECURITY ACT)

1. *Colorado has policies and procedures to prevent access to assistance through electronic benefit transfer transactions in an automated teller machine or point-of-sale device located in casinos, liquor stores, and retail establishments which provide adult-oriented entertainment.*

(A) *Legislation.* Colorado State Legislature passed a law addressing the Prohibited Uses of Public Assistance Benefit Cards. This law addressed the use of Colorado Works benefits provided to a recipient on a Colorado EBT card account (Section 26-2-104 (2) (a)). The enacted Statute outlines that: Recipients cannot access their EBT cash benefits from an ATM located at licensed gaming establishments; in-state simulcast facilities; commercial bingo facilities; stores that sell firearms; or retail establishments licensed to sell malt, vinous, or spirituous liquors.

(B) *Rule.* Colorado State Regulations have been revised to reflect prohibited locations, and includes increasing penalties when misuse occurs. County departments are required to discuss this information with the recipient during the eligibility interview and when the EBT card is issued.

(C) *Education.*

Participants. Information about establishments where EBT transactions are prohibited is provided to recipients at the eligibility interview and when the recipient requests to receive cash benefits on an EBT card. This information is also posted in County Department Human/Social Service offices. Recipients are also given an informational brochure. This brochure informs recipients:

- Which types of transactions involve no fees or charges;
- Which types of transactions involve fees and/or surcharges; and

- Where they can access or withdraw their cash benefits (POS terminals at retail locations statewide and ATM machines).

The State requires participants to sign a disclaimer upon issuance of the EBT Card indicating they are aware of and understand the usage restrictions.

Colorado has three options for recipients to receive their cash assistance: Colorado EBT card, direct deposit into a bank account, and enrolling in the KeyBank branded debit card. The KeyBank card provides the recipient more options for accessing cash; including online bill pay, while offering better opportunities for managing their money. The recipient can obtain their cash anywhere MasterCard is accepted.

County Staff. Caseworkers and county administrators have and will continue to receive information about the law. New and existing caseworkers will be consistently trained in providing accurate information to EBT card recipients. Compliance will be monitored during the County Management Evaluations conducted by the State department.

(D) *Monitoring.* Monitoring will consist of running quarterly EBT usage reports to track businesses including marijuana shops allowing this activity. Businesses allowing this activity will be notified that they are out of compliance with Public Law 112-96, Section 4004 and of the specific steps to take to come into compliance.

Individuals' transactions are also be examined at least quarterly. Individuals who use prohibited ATMs are contacted by the State department and provided information about the appropriate use of EBT cards. Repeated inappropriate usage will result in disabling the card and requiring personal interaction with the county department for additional assessment, education and/or explore access issues.

(E) *Automated Prevention*. Colorado's EBT vendor implemented a new automated prevention strategy July 1, 2014. It flags transactions at prohibited businesses based on goods or services it provides using a "merchant category code." When a client attempts an EBT transaction at a point of sale (POS) device or ATM located in one of these businesses, the transaction will be denied.

Fraud: Colorado reviews information from our benefit payment system, interfaces with other systems, and fraud investigations to limit the amount of fraud and abuse in the program. Questionable cases will be reviewed through a county investigation to certify the accuracy of the information, and determine if the applicant and/or participant committed an Intentional Program Violation (IPV) or fraud. IPV's are processed by the county and are resolved by obtaining a "Waiver of Intentional Program Violation" through an administrative disqualification hearing or through referral for civil or criminal action in a State or federal court. An IPV is committed when an individual makes a false or misleading statement or fails to disclose any action intending to mislead or conceal any eligibility factor on any application or other written communication. Fraud is subject to criminal action and must be proven beyond a reasonable doubt.

Colorado continues to review and implement standards and procedures to enforce program regulations and combat program fraud and abuse. All counties are required to create and comply with their county fraud prevention policy, which includes standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage.

H. ENSURE THAT RECIPIENTS OF ASSISTANCE PROVIDED UNDER THE STATE PROGRAM FUNDED UNDER THIS PART HAVE THE ABILITY TO USE OR WITHDRAW ASSISTANCE WITH MINIMAL FEES OR CHARGES, INCLUDING AN OPPORTUNITY TO ACCESS ASSISTANCE WITH NO FEE OR CHARGES, AND ARE PROVIDED INFORMATION ON APPLICABLE FEES AND SURCHARGES THAT APPLY TO ELECTRONIC FUND TRANSACTIONS INVOLVING THE ASSISTANCE, AND THAT SUCH INFORMATION IS MADE PUBLICLY AVAILABLE (SECTION 402(A)(1)(A)(VIII) OF THE SOCIAL SECURITY ACT)

Colorado has three options for recipients to receive their cash assistance: Colorado EBT card, direct deposit into a bank account, and enrolling in the KeyBank branded debit card. Fidelity Information Services (FIS) is the vendor that processes all EBT transactions for Colorado. The EBT card is the traditional method for recipients to receive their cash assistance. There is not a fee for making cash purchases, including getting cash back through a Point of Sale (POS) device. FIS charges a 32-cent ($.32) fee for withdrawing money at an ATM; any additional ATM surcharges may apply. The KeyBank debit card requires the recipient to complete an enrollment form to request this option. The KeyBank card provides the recipient more options for accessing cash; including online bill pay, while offering better opportunities for managing their money. The recipient can obtain their cash anywhere MasterCard is accepted. KeyBank does not charge a fee for withdrawing or accessing money at a; KeyBank branch, KeyBank ATM, AllPoint ATM, or POS terminal including cash back and online purchases. There is a $1.50 ATM processing fee for using a Non-KeyBank or Non-AllPoint ATM; additional ATM surcharges may apply. Information about establishments where EBT transactions are prohibited is provided to recipients at the eligibility interview and when the recipient requests to receive cash benefits on an EBT card. This information is also posted in County Department Human/Social Service offices. Recipients are also given an informational brochure. This brochure informs recipients:

- Which types of transactions involve no fees or charges;
- Which types of transactions involve fees and/or surcharges;
- and Where they can access or withdraw their cash benefits (POS terminals at retail locations statewide and ATM machines).

I. INDICATE WHETHER IT INTENDS TO TREAT FAMILIES MOVING FROM ANOTHER STATE DIFFERENTLY FROM OTHER FAMILIES UNDER THE PROGRAM, AND IF SO HOW (SECTION 402(A)(1)(B)(I) OF THE SOCIAL SECURITY ACT)

Colorado does not impose different eligibility criteria or benefit levels on families moving into Colorado from other States.

J. INDICATE WHETHER IT INTENDS TO PROVIDE ASSISTANCE TO NON-CITIZENS, AND IF SO INCLUDE AN OVERVIEW OF THE ASSISTANCE (SECTION 402(A)(1)(B)(II) OF THE SOCIAL SECURITY ACT)

Qualified legal non-citizens or those who are not federally exempt, who entered the United States on or after August 22, 1996, are ineligible for cash assistance for five (5) years from date of entry into the United States.

K. SET FORTH OBJECTIVE CRITERIA FOR THE DELIVERY OF BENEFITS AND THE DETERMINATION OF ELIGIBILITY AND FOR FAIR AND EQUITABLE TREATMENT, INCLUDING AN EXPLANATION OF HOW IT WILL PROVIDE OPPORTUNITIES FOR RECIPIENTS WHO HAVE BEEN ADVERSELY AFFECTED TO BE HEARD IN A STATE ADMINISTRATIVE OR APPEAL PROCESS (SECTION 402(A)(1)(B)(III) OF THE SOCIAL SECURITY ACT)

Eligibility Criteria

Colorado Revised Statutes set uniform statewide basic eligibility and minimum benefit levels for basic cash assistance based on Aid to Families with Dependent Child(ren) (AFDC) rules that were in effect on July 16, 1996, with the following exceptions:

1. Families do not have to include half siblings in the same assistance unit if at least one of the half siblings is receiving child support;
2. Two-thirds of a participant's income gets disregarded for ongoing benefit calculation
3. Two parents are treated the same as single parent families;
4. A family's resources are exempt

Eligibility criteria for cash assistance also include the following:

1. Colorado does not impose a family cap;
2. Colorado does require the participant to work with child support services, to ensure child(ren) receive financial supports
3. Expectant parents that can prove pregnancy are eligible; and
4. All work eligible individuals must sign and participate in an individualized plan for employment.

The following persons shall be ineligible for all Colorado Works benefits or services:

1. Fugitive or fleeing felons, parole violators, or probation violators;
2. Specified caretakers who fail to report, without good cause within normal program reporting requirements, a child(ren) who is expected to be out of the home for longer than forty-five (45) calendar days will be ineligible for assistance for ninety (90) calendar days from the date that it is determined he or she should have reported the expected absence;
3. Persons convicted of a drug-related felony on or after July 1, 1997, unless the county department has determined that the person has taken action toward rehabilitation, such as, but not limited to, participation in a drug treatment program;
4. Persons participating in a strike;
5. Qualified legal non-citizens or those who are not federally exempt, who entered the United States on or after August 22, 1996, are ineligible for cash assistance for five (5) years from date of entry into the United States.

In addition to the basic cash assistance grant, county departments of human/social services may provide other assistance in the form of additional benefits, services, and incentives to participants above the basic benefit level, as outlined in their county policy.

Dependent child(ren) must live with a specified caretaker; except for child(ren) receiving family preservation services or child(ren) receiving services as outlined in Colorado's approved Title IV-A State Plan in effect as of September 30, 1995. A specified caretaker is a person who exercises responsibility for the child and may or may not be related to that child.

To receive benefits, an assistance unit may consist of the dependent child, siblings of the dependent child, and specified caretaker (such as parents or grandparents etc.). A dependent child is a child under age 18 or between 18 and 19 who is expected to graduate from high school prior to his/her 19th birthday.

Every household receiving TANF assistance is raising a child. There are three primary family types receiving Colorado Works assistance:

- Two parent households or single parent households with at least one child
- Child(ren) living with a relative or caretaker where the child(ren) and the relative or caretaker are also receiving benefits
- Child-only participants are child(ren) living with a relative or caretaker whereby benefits are to support the child(ren), but not the adult(s) in the household

Persons living in the household who are financially responsible for members of the assistance unit, but who are not required to be in the unit, will have their income, minus the employment disregard, deemed available to the family unit. The income disregard at initial application is $90; once eligibility has been established, 67% of income will be disregarded during the certification period (up to six months). The generous disregard after eligibility has been determined is intended to support a transition to employment for families receiving assistance, allowing access to not only basic cash, but also case management and supportive services that are critical during early attachment to work.

Services are provided to child(ren) in out of home placement or in juvenile justice facilities in accordance with the provisions of the approved Emergency Assistance State Plan in effect on September 30, 1995. Non-monetary services may also be provided to a non-custodial parent according to program rules, as outlined in county policy.

Appeals: All programs and services under the Colorado Works program are implemented in a fair and equitable manner. This includes ensuring the correct use of any adverse actions towards applicants and participants of Colorado Works whose basic cash assistance benefits have been denied, reduced or discontinued. An applicant and/or participant may appeal such decisions through the appeals process established by CDHS.

All disputes and complaints begin at the county level. Participants are informed of their appeal rights at application and when any adverse action is taken on his/her case. Individuals who believe that an agency decision regarding the receipt of benefits or services is incorrect may appeal the adverse action. An applicant or recipient who disagrees with a proposed action has the right to a local level dispute resolution conference, which must be requested prior to the effective date of the proposed action. If the individual does not wish to utilize the local/county conference to resolve the dispute, they may request a State level fair hearing before an Administrative Law Judge. If the individual is dissatisfied with the outcome of the local dispute resolution conference, a State level fair hearing before an Administrative Law Judge can take place if a request is received no later than 90 calendar days after the date the notice of proposed action was mailed by the county department/agency.

Judicial review of the final agency decision in the appropriate State district court, after exhausting the administrative appeals rights, may be granted. If the appellant is receiving financial assistance, medical assistance, social services, or basic cash assistance under the Colorado Works Program at any time a conference or hearing is requested, all benefits will continue, pending the outcome of the State level fair hearing and final agency decision, if the

request for local conference and or State level fair hearing is made prior to the effective date of the proposed action being appealed or the 10 day period for appealing a county dispute resolution decision to the State department. Continued benefits will be authorized unless the recipient states in writing that the continued benefits are being waived.

A Colorado Works participant receiving basic cash assistance will have benefits continued if an appeal is filed timely and in accordance with the rules and regulations established by CDHS. If a recipient requests a local dispute resolution conference or State level fair hearing within the noticing period, financial assistance under the Colorado Works program will continue during the dispute resolution process or State level appeal period until the final agency decision is entered or the recipient voluntarily abandons the appeal or discontinues benefits.

Any county employee complaints are heard by the Colorado Department of Labor and Employment.

L. INDICATE WHETHER THE STATE INTENDS TO ASSIST INDIVIDUALS TO TRAIN FOR, SEEK, AND MAINTAIN EMPLOYMENT (SECTION 402(A)(1)(B)(V) OF THE SOCIAL SECURITY ACT)—

1. PROVIDING DIRECT CARE IN A LONG-TERM CARE FACILITY (AS SUCH TERMS ARE DEFINED UNDER SECTION 1397J OF THIS TITLE); OR

2. IN OTHER OCCUPATIONS RELATED TO ELDER CARE, HIGH-DEMAND OCCUPATIONS, OR OCCUPATIONS EXPECTED TO EXPERIENCE LABOR SHORTAGES AS, DETERMINED APPROPRIATE BY THE STATE FOR WHICH THE STATE IDENTIFIES AN UNMET NEED FOR SERVICE PERSONNEL, AND, IF SO, SHALL INCLUDE AN OVERVIEW OF SUCH ASSISTANCE.

Colorado intends to assist individuals to train for, seek and maintain employment to provide direct care in a long-term care facility and in other occupations related to elder care determined appropriate by the State of Colorado for which Colorado identifies an unmet need for service personnel.

Colorado supports work based learning initiatives including several subsidized employment programs for high-demand occupations and occupations expected to experience labor shortages. Work based learning is embedded in the framework of the program.

M. PROVIDE FOR ALL MOE-FUNDED SERVICES THE FOLLOWING INFORMATION: THE NAME OF THE PROGRAM BENEFIT OR SERVICE, AND THE FINANCIAL ELIGIBILITY CRITERIA THAT FAMILIES MUST MEET IN ORDER TO RECEIVE THAT BENEFIT OR SERVICE. IN ADDITION, FOR TANF MOE-FUNDED SERVICES (CO-MINGLED OR SEGREGATED MOE) DESCRIBE THE PROGRAM BENEFIT PROVIDED TO ELIGIBLE FAMILIES (SSP SERVICES DO NOT HAVE TO INCLUDE A DESCRIPTION BUT THE DEPARTMENT OF HEALTH AND HUMAN SERVICES ENCOURAGES IT) (§263.2(B)(3) & §263.2(C) PREAMBLE PAGES 17826-7)

The Colorado General Assembly annually appropriates TANF funds for State administration, evaluation, computer system maintenance, funding for specific program needs, with the largest portion going towards a county block grant. The total block grant includes local and federal funds for counties to operate the Colorado Works program. The county block grant is then allocated to individual counties through the statutorily authorized Works Allocation Committee (WAC). The committee applies a formula based on economic and demographic factors to derive individual county allocations.

Counties have primary programmatic flexibility for implementation of the TANF program, and as such are allowed by State statute and program rule to make fiscal and policy decisions based on the amount of funds available to them each year through the county block grant. CDHS

monitors and reports expenditures through the Colorado Financial Management System (CFMS). State auditors (both internal to CDHS as well as external) may audit county operations. Colorado segregates State/local maintenance of efforts (MOE) funds from federal TANF funds to increase program flexibility, and ensures that fiscal constraints related to each funding source are applied accurately.

Maintenance of effort: Colorado continues its maintenance of effort based on FFY 1994 expenditures at the level of at least 80 percent unless federal work participation rates are met, in which case Colorado will reduce its MOE expenditures to 75 percent. In order to meet its annual MOE obligation, Colorado may count any qualifying expenditures that are allowed under federal statute and regulation. Qualifying MOE expenditures are any non-federal and otherwise unclaimed expenditure made on behalf of TANF-eligible families with household gross income up to $75,000 per year. The primary sources of qualifying expenditures include:

1. Colorado Works. This includes expenditures made at the county level on benefits and services as well as program administration costs directly related to the provision of these benefits and services.

2. Emergency Assistance to Families with Child(ren). This includes case planning services, case management services, counseling, family support programs, intensive family therapy, day treatment, home-based services, non-medical drug and alcohol treatment, or crisis intervention services.

3. Child Welfare Services. This includes expenditures made at the county level on services for TANF eligible families to protect child(ren) from harm or to assist families in caring for their child(ren).

4. Colorado Child Care Assistance Program (CCCAP). This program serves families consisting of caretaker relatives caring for child(ren) up to 225 percent of the federal poverty level through assistance with payments for child care services. Families receiving services are employed, in training, or looking for a job.

5. Low-income Energy Assistance Program (LEAP). LEAP provides benefits and services to TANF-eligible households for help with winter heating costs. Colorado is aware that it may not count toward their TANF MOE requirement any expenditure used to receive Federal LIHEAP Leveraging Incentive Funds.

6. Refundable Tax Credits. The Colorado Earned Income Tax Credit and the Child Care Tax Credit.

7. Education Expenditures from the Colorado Preschool Program. This program provides funding to Colorado schools in an effort to establish quality early childhood education programs, strengthen families, and support them as participants in their child's education. School districts conduct an individualized educational program for the child with family involvement.

8. Nurse Home Visitor Program. This program consists of nurse home visitors who work with women and their families in their homes during pregnancy, and through the first two years of the child's life. The program provides regular visits with new or at-risk mothers to improve parenting skills and child wellbeing and to link mothers to needed social services. This is accomplished through regular home visiting sessions through the child's second birthday.

9. Pro-family healthy marriage and responsible fatherhood activities enumerated in part IV-A of the Act. Colorado is aware that the pro-family MOE spending provision pertains only to the allowable non-assistance healthy marriage and responsible fatherhood activities enumerated in sections 403(a)(2)(A)(iii) and section 403(a)(2)(C)(ii) of the Act, and listed in TANF-ACF-PI-2008-10, e.g., not public education activities.

10. Non-profit and private spending. Colorado receives spending information from non-profits, foundations, and other charitable organizations on TANF eligible families. The services provided fall mainly into the categories of family stability, short term housing assistance, educational and youth development activities, job readiness and transportation.

TANF CERTIFICATIONS

The State Plan must include	Include
1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act);	Yes
2. Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act);	Yes
3. Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the fiscal year, which shall include assurances that local governments and privatesector organizations (section 402(a)(4) of the Social SecurityAct)—	
3. (A) have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and	Yes
3. (B) have had at least 45 days to submit comments on the plan and the design of such services;	Yes
4. Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act);	Yes
5. Establish and enforce standards and procedures to ensure against program fraud and abuse,including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act);	Yes
6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—	
6.i. screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;	Yes
6.ii. refer such individuals to counseling and supportive services; and	Yes

The State Plan must include	Include
6.iii. waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.	Yes

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;

Colorado will assign JVSG supported staff to AJCs located within the State Workforce Agencies (SWA) in order to most effectively advance and assure both Priority of Service with regard to all employment and training services, as well as, the prompt referral to appropriately needed supportive services for veteran customers. That is not to say that it is JVSG staff's responsibility to provide Priority of Service, but to provide technical assistance for AJC staff as needed. Of the supported staff, the majority will be placed in the local areas that have the greatest Veteran population and the highest caseloads. DVOP specialists assigned to their regional AJCs will be allowed to visit the offices of our outreach partners located outside of the AJCs after an approved schedule has been arranged and approved by their Regional Director. The JVSG supported staff may be assigned to locations outside of the AJC such as, but not limited to, the Department of Veteran Affairs (DVA) Vocational Rehabilitation & Employment in Denver, the Soldier and Family Assistance Office on Fort Carson, college campuses, or other partner locations.

One LVER position will be assigned to the CDLE Headquarters to serve as the State Veterans Coordinator (SVC). With a veteran friendly state as large as Colorado, supporting 6 very active military bases, with 77 American Job Centers and satellite offices and a JVSG program that employees 36 staff members, among other duties this position will oversee developing, implementing and monitoring a department Statewide Veterans Employment Program. In partnership with our county and state operated AJCs and other Veteran focused partners, the Coordinator (SVC) will develop this program to improve upon Priority of Service procedures by addressing the strategies by which the workforce system delivers employment services.

Within the AJCs, DVOP specialists will assess training needs and the employment goals of eligible veterans to overcome barriers and refer them to WIOA, OJC and apprenticeship opportunities as appropriate. DVOPs will be collocated and aligned within the WIOA divisions. The reasoning behind this decision is to promote; (i) program co-enrollments, (ii) similarities in WIOA and JVSG case management practices and (iii) promote the appearance of a seamless application process to Veterans who apply for training in one or both programs (iv) and most importantly to ensure the demonstration of Priority of Service and access to resources.

As DVOPs assist veterans in meeting their employment goals through individualized career services, veterans become job ready and will need assistance connecting to employers. LVERs assist the connection of job ready veterans to employers looking for qualified

candidates. LVERs help facilitate this process through job search workshops, networking events, employer information sessions, seminars and direct referrals to connect veteran candidates and employers.

In an effort to continue to meet the employment and training needs of veterans, CDLE recognizes that changes in delivery strategies when targeting Veterans need to respond to the forecasted increase in veterans transitioning out of the military and into the civilian labor force. Outreach to locate veterans with Significant Barriers to Employment (SBE) is a required duty of the DVOP specialist as outlined in VPL 03-14. As such, DVOP specialists conducting outreach will begin assisting eligible veterans first within their assigned AJC and then at the outreach locations they visit or are assigned to. At the outreach locations, Veterans identified as not meeting one of the SBE categories will be provided a point of contact for assistance at the nearest AJC by other AJC staff. The DVOP specialists will conduct outreach activities within various organizations that provide services to Veterans allowing us to identify from within the Veteran population they serve, those who are eligible for DVOP services. The sole purpose of these outreach activities are to identify eligible SBE veterans and other eligible persons who, without the receipt of individualized career services, would not be able to obtain employment on their own. State MIS Database and partner organizations that have been identified and approved as effective outreach sources include, but are not limited to:

- Connecting Colorado (State MIS Database)
- AJC Partners (particularly WIOA and Wagner-Peyser)
- Military Installations…excluding the Transition Assistance Program (TAP)
- Colleges, Universities and Technical Schools
- Homeless Veterans Reintegration Programs (HVRP) and Homeless Shelters
- Vocational Rehabilitation and Employment Programs (VR&E)
- Department of Veteran Affairs Medical Centers and Vet Centers
- Veteran Service Offices (VSO)

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;

Under this grant Colorado will staff 27 full-time permanent DVOP specialists and 9 LVER in FY 2020. This staffing arrangement allows intensive services and business engagement to be available in the areas of the state where the largest concentrations of veterans are seeking employment.

The primary duties of DVOPs are to provide individualized career services to veterans with significant barriers to employment and any other veteran category identified by the Assistant Secretary. Case management continues to be an appropriate service delivery strategy or framework in which individualized career services will be delivered.

The individualized career services and the purpose for which they are used by the DVOP specialists are:

- Comprehensive Assessment (CA): Comprehensive and specialized assessments of the skill levels and services which may include diagnostic testing and use of other assessment tools and in depth interviewing and evaluation to identify employment barriers and appropriate employment goals.
- Counseling (CS): A client centered service that may involve personal, financial, life management, case management, career guidance and counseling. This service also includes referrals to other assistance, as well as, arranging for additional support services not previously acquired.
- Individual Employment Plan (IE): A formal written document outlining a course of action that will lead to the individual entering employment; to include short and/or long term goals to remove barriers to getting and keeping employment.
- Pre-Vocational Services (PV): Short-term pre-vocational services such as GED, ESL, remediation and workplace literacy.

Additionally, outreach to locate veterans with SBEs is a required duty of the DVOP specialist as outlined in VPL 03-14. As such, DVOP specialists conducting outreach will begin assisting eligible veterans first within their assigned AJC and then at the outreach locations they visit or are assigned to. At the outreach locations, Veterans identified as not meeting one of the SBE categories will be provided a point of contact for assistance at the nearest AJC by other AJC staff. The DVOP specialists will conduct outreach activities within various organizations that provide services to Veterans allowing us to identify from within the Veteran population they serve, those who are eligible for DVOP services. The sole purpose of these outreach activities are to identify eligible SBE veterans and other eligible persons who, without the receipt of individualized career services, would not be able to obtain employment on their own.

The primary duties of LVERs are:

- 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;
- Facilitating employment, training, and placement services furnished to veterans in a State under the applicable State employment service delivery systems. Facilitate is defined as capacity building within all programs.
- Working with other service providers in order to promote veterans as highly skilled and experienced members of the workforce;
- Advocating for veterans employment and training opportunities with businesses, industry, and community-based organizations is also a primary duty;
- Conducting outreach that includes, but is not limited to, planning and participating in job fairs, promoting employment and training opportunities for veterans with business organizations, unions, and apprenticeship programs;
- Promoting credentialing and training opportunities for veterans with training providers and licensing agencies;
- Establishing and maintaining regular contact with employers to include federal contractors;
- Active involvement with the AJC employer or business services/relations team;

- Coordinating the Regional Manager's Report on Services to Veterans using the format found in VPL 07-19. Reasonable attempts are made to include best practices and success stories, special projects, and other LVER and DVOP activities.

C. THE MANNER IN WHICH DVOP SPECIALISTS AND LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEM OR AMERICAN JOB CENTER;

As a mandatory partner under WIOA, DVOP specialists and LVERs will be fully integrated with the WIOA, Wagner-Peyser, and Business Service Representatives staff. The JVSG staff is under the direct supervision of the state; however, local workforce directors ensure the functions of grant staff are integrated into the One-Stop environment. The State Veterans Program Coordinator provides general oversight and monitoring of Colorado's Veterans Employment and Training Programs and alerts state administrators to any program issues.

The purpose of the integration is to deliver the appropriate services as seamless as possible. Integration also allows representatives other than the JVSG staff to deliver services to veterans on a priority basis. The integration of the JVSG staff supports the co-enrollment of eligible veterans into funded programs in order to leverage available training funds to provide skills development for the veterans who meet the program criteria with the purpose of preparing the veteran for in-demand careers. During and after training the one stop delivery system partner network, LVERs and DVOPs will work together to find and place the veteran in viable employment.

The DVOP specialists will be placed within close proximity of the WIOA case managers in order to promote cross training in the way of case management and program processes and alignment with other service providers of individualized career services. The LVERs are placed in close proximity of the Business Service Division in order to promote cohort job driven efforts in the outreach to employers, the planning of employment events and the sharing of labor market information. LVERs are the subject matter experts who will ensure that training is facilitated in regards to Priority of Service, preparing veterans for a civilian career and program policies. LVERs will also make themselves available to assist those who may have a question in regards to connecting to other veteran resources located outside of the State's employment service delivery system or one-stop delivery system partner network.

D. THE INCENTIVE AWARD PROGRAM IMPLEMENTED USING THE 1% GRANT ALLOCATION SET ASIDE FOR THIS PURPOSE, AS APPLICABLE;

The program provides an award and recognition system authorized by Colorado Veterans Employment and Training Program in accordance with 38 U.S.C. Chapter 41 and 42 and by direction of Veterans Program Letter (VPL) 04-19. The program is designed to recognize contributions to the objectives of VPL 04-19 through excellence in performance and service to veterans. The program is funded by 1% of the JVSG Grant.

The incentive award program will encourage individuals and offices to achieve excellence in the provision of services and strive to think critically to implement improvements to the system for the delivery of such services by recognizing them for the hard work and dedication they devote to serving veterans. The incentive awards presented will be meaningful so JVSG, non-JVSG and partnering staff will want to put in the extra effort to receive the incentive award.

Individual: Eligible recipients for individual incentive awards are Disabled Veterans' Outreach Program (DVOP) specialists, Local Veterans' Employment Representative (LVER) staff, and any other individual who provides employment, training, and placement services to veterans under the Workforce Innovation and Opportunity Act (WIOA), include labor exchanges funded by the

Wagner-Peyser Act or staff of American Job Center partner agencies. States are not restricted from awarding individuals who collectively serve a specific function or work in an area where their performance warrants recognition under a state's incentive awards program. Volunteers, U.S. Department of Veterans Affairs Work Study participants, and Federal employees are not eligible recipients. Employment Service Offices: Public Law 109-461 Sec. 603 expands the recipient eligibility for performance incentive awards to include "employment service offices." Offices eligible to receive incentive awards include any service delivery point that provides exemplary public employment and training services to veterans; American Job Centers operated by State Workforce Agencies or offices that contract with State, Regional, or Local Workforce Development Boards; and other agencies identified in Section 121(b)(2)(B) of WIOA that provide services to veterans. Per Public Law 109-461 Sec. 603, incentive awards may be used by employment service office recipients for any purpose. Awards to offices should be reserved for instances where most, if not all, employees in an office contribute to improving employment or training services offered and provided to veterans.

These awards will recognize eligible recipients that foster or strengthen partnerships at the state and local level. The selection criteria for award recipients will be based on performance or activities during the fiscal year for which the award is given. This criterion will include both objective and subjective data in performance or activities that impact veterans. The program will look at employees and offices that demonstrate outstanding outreach on behalf of veterans who have barriers to employment, especially homeless, incarcerated, disabled, and recently separated veterans. Included in consideration for this award will be individual or office-wide programs that promote employment opportunities for veterans within the local community or enhance provider awareness of veterans' issues and resources. Examples of such data may include but is not limited to; attitude, motivation, program improvement, positive feedback, and other indicators of outstanding performance will be given consideration in addition to numerical data.

The Colorado Department of Labor and Employment administers the funds for the Incentive Awards Program. Recipients will be recognized with Distinguished or Spot Awards that may be monetary or non-monetary. Spot Awards will be valued at or less than $250 per award. Distinguished Awards will be valued at or greater than $100 and no more than $3000 per award and may be presented to individuals, groups or offices. Non-monetary awards will consist of awards, such as but not limited to, tickets to sports and entertainment events, gift cards, conference fees such as the National Association of State Workforce Agencies (NASWA) Veterans conference in D.C. or other conferences that benefit the recipient, ceremonies, luncheons, travel, and others awards as allowable in VPL 04-19. The type, amount, manner of distribution and specifics for Spot or Distinguished Awards will be determined by an incentive awards committee. The committee members will be determined by CDLE leadership and may consist of any combination of representation from the Colorado Veterans Employment Program, CDLE, American Job Center System, and/or WIOA partner programs. All awards will be based on performance or activities that occurred during the program year for which the award is given. In accordance with VPL 04-19, incentive award funds will be obligated by September 30 each Federal Fiscal Year and expended by the following December 31. A report of the obligated funds will be provided with the fourth quarter report and a report of the expended funds will be provided with the first quarter of the following fiscal year.

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);

The primary role of the DVOP specialists is to provide intensive services to Veterans who, after being properly triaged and assessed by either Wagner-Peyser or WIOA staff, are identified as "eligible veterans and eligible persons." In order to best serve eligible Veterans effectively and efficiently and to better target their services, the DVOP specialists will deliver these services utilizing a case management approach and will limit their services to eligible veterans and eligible persons who meet the definition of an individual with a Significant Barrier to Employment (SBE), specifically defined in VPL 03-14 including Change 1 and 2, 07-14, and 03-19. Veterans categorized as having a SBE are:

- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C § 4211(1) and (3); special disabled and disabled veterans are those:
    - Who are entitled to compensation (or who, but for the receipt of military retired pay, would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or,
    - Were discharged or released from active duty because of a service-connected disability;
- A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. I 1302(a) and (b)), as amended;
- A recently-separated service member, as defined in 38 U.S.C § 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months;
- An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;
- A veteran lacking a high school diploma or equivalent certificate; or
- A low-income individual (as defined by WIOA Section 3 (36));
- Veterans between the ages of 18-24 years old;
- Transitioning Service Members who participated in TAP and are in need of intensive services, as documented by their DD-2958;
- Active Duty service members being involuntarily separated through Reduction-in-Force
- Wounded Warriors as defined as members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities or warrior transition units; or the spouses or other family caregivers of such wounded, ill, or injured members;
- Vietnam-era Veterans as identified in 38 U.S.C. 4211, the term "Veterans of the Vietnam Era" is an eligible veteran any part of whose active military, naval, or air service was during the Vietnam era. 38 U.S.C. defines "Vietnam-Era" to mean the period beginning on February 28, 1961, and ending on May 7, 1975, in the case of a veteran who served in the Republic of Vietnam during that period, and the period beginning on August 5, 1964 and ending May 7, 1975, in all other cases;
- Other eligible persons as defined as a spouse of a totally disabled or deceased veteran whose disability or death was service-connected, or spouse of a service member who

was listed for 90 or more days as missing in action or forcibly detained by a foreign power while serving on active duty. To be eligible for referral to DVOP services the spouse must also have one of the above listed SBE's, if not they should be served by Wagner-Peyser staff.

F. HOW THE STATE IMPLEMENTS AND MONITORS THE ADMINISTRATION OF PRIORITY OF SERVICE TO COVERED PERSONS;

Per Grant Officer Memorandum 01- 20, a response to this section is not required.

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 Grant Officer Memorandum 01-20, a response to this section is not required.

2. EMPLOYMENT PLACEMENT SERVICES, AND

Local Veteran Employment Representatives (LVER) work with employers to expand opportunities and build capacity for all veterans utilizing the workforce system. In addition, LVERs work closely with Disabled Veteran Outreach Program (DVOP) specialists, WIOA case managers and Wagner-Peyser staff to ensure that veterans deemed job ready are connected to employment opportunities through their network of businesses and of those located within the states labor exchange Connecting Colorado. LVER's will also be co-located and aligned with the workforce center Business Services Division or Team. By doing so this provides the LVER the opportunity to work with the Business Service Representatives and to participate in the planning and implementation of any employer focused initiative in which all veterans and eligible persons may benefit from. The LVER and DVOP specialists meet at a minimum of once a month to review and discuss the SBE veterans in their caseload. The tools in which we measure the services provided include but are not limited to:

- Vets 9002 and 200 Report or Form ETA 9173, if available (9002 and 200 are still accessible at the state level, but the 9173 is used for US DOL reporting)
- Interviewing of AJC staff
- State monitoring tool
- Review of program files and documentation
- Customer surveys
- Site visits
- Accompanying DVET during federal audits
- Quarterly Managers Report
- CDLE Regional Directors meeting

3. JOB-DRIVEN TRAINING AND SUBSEQUENT PLACEMENT SERVICE PROGRAM FOR ELIGIBLE VETERANS AND ELIGIBLE PERSONS;

The JVSG and workforce center staff participate in state and local area training sessions and initiatives centered around sectors and career pathways. JVSG and workforce center staff utilizes local labor market information as a tool when eligible veterans and persons are making

job-driven training decisions. Through the complete training process, the DVOP specialists, WIOA and Wagner-Peyser staff will work in conjunction with the LVER and business service team to assist eligible veterans and persons to identify employment and training opportunities through the state labor exchange Connecting Colorado. The tools in which we measure the services provided include but are not limited to:

- Vets 9002 and 200 Report or Form ETA 9173, if available (9002 and 200 are still accessible at the state level, but the 9173 is used for US DOL reporting)
- Interviewing of AJC staff
- State monitoring tool
- Review of program files and documentation
- Customer surveys
- Site visits
- Accompanying DVET during federal audits
- Quarterly Managers Report
- CDLE Regional Directors meeting

H. THE HIRE DATE ALONG WITH MANDATORY TRAINING COMPLETION DATES FOR ALL DVOP SPECIALISTS AND LVER STAFF; AND

The steps below indicate how the state will expeditiously fill vacancies or keep grant-funded positions filled despite State budget problems, hiring freezes, and or potential furloughs. The announcement of DVOP or LVER openings is published online at the State Classified job website. When the announcement is published, all qualified applicants may apply. Email lists developed by DVOPs and LVERs are used to broadcast the announcements to veterans.

1. When a LVER vacancy is announced, the minimum requirements for the position are taken from Title 38 U.S.C., Chapter 4103, as amended, and are used to identify qualified veterans. Preference is given to disabled veterans. The veteran's status must be substantiated with a DD214 and letter from the Department of Veterans' Affairs to qualify for preference for the position. These requirements apply to all applicants whether internal or external. If no qualified veteran can be found, then a non-veteran can be temporarily placed in the vacant position to continue services to veterans. According to Federal law a non-veteran cannot work more than six months in a LVER position after which time the LVER vacancy will be re-announced to recruit qualified veterans.
2. When a DVOP vacancy is announced, the minimum requirements for the position are taken from Title 38 U.S.C., Chapter 4103, as amended, and are used to identify qualified veterans. Preference is given to disabled veterans. The veteran's status must be substantiated by a DD214 and letter from the Department of Veterans' Affairs regarding the existence of a service connected disability. These requirements are for all applicants from internal or external sources. If no qualified disabled veteran can be found, then a veteran without a disability can fill the position. If neither a qualified disabled veteran nor qualified veteran can be found, a non-veteran can be temporarily placed in the vacant position to continue services to veterans. According to Federal law a non-veteran

cannot work more than six months in a DVOP position after which time the DVOP vacancy will be re-announced to recruit qualified veterans.

Both DVOP and LVER are required to attend the National Veteran Training Institute (NVTI) to receive specialized training unique to their roles and responsibilities. This training must be accomplished within 18 months from their hire dates. The State Veterans Coordinator will maintain the below table so that the state can track the hire dates along with the mandatory training dates for all DVOP specialists and LVER staff.

JVSG funded staff:

JVSG funded staff	Position	Date Assigned Current Position	Mandatory training completion date	LES/FVE	CM/IS	PPE/EO	Complete Y/N
Alred, Dave	DVOP	6/1/10	12/1/11	10/17/00	12/4/01	5/19/15	YES
Amthor, Tim	LVER	6/1/11	11/30/12	9/30/03	3/3/15	4/10/12	YES
Bangert, Martin	LVER	10/4/14	6/22/18	9/1/15	3/3/15	N/A	YES
Bellamy, Justin	DVOP	1/23/17	8/11/17	5/26/17	8/11/17	11/17/17	YES
Broker, Matthew	LVER	1/11/16	11/28/16	9/1/15	3/3/15	N/A	YES
Bryce, Monica	DVOP	10/1/12	4/2/14	2/8/05	5/17/05	3/6/12	YES
Cannon, John	DVOP	5/7/18	12/14/18	7/26/18	11/2/18	9/28/18	YES
Chavez, Ben	DVOP	9/1/04	3/3/06	11/16/04	1/25/05	N/A	YES
Duplikhin, Alexey	LVER	1/23/17	7/25/18	6/6/14	3/6/15	4/17/15	YES
Ford, Antonio	DVOP	3/16/09	9/15/10	10/20/09	1/26/10	2/2/10	YES
Ford, Kathy	LVER	6/1/11	11/30/12	2/1/05	8/23/05	10/26/07	YES
Foster, Micah	LVER	9/24/18	3/1/19	3/8/16	5/3/16	N/A	YES
Garcia, Alfredo	DVOP	5/18/15	11/16/16	9/1/15	10/27/15	N/A	YES
Hendricks, Bert	LVER	6/1/11	11/30/12	5/16/06	4/7/15	9/19/06	YES
Hitt, Kevin	DVOP	6/4/18	12/14/18	8/28/18	11/2/18	9/21/18	YES
Johnson, David	DVOP	6/11/18	2/15/19	8/20/18	11/2/18	9/21/18	YES
Kroese, Kent	DVOP	12/31/09	7/2/11	1/30/07	7/24/07	N/A	YES
Lanier, Lavade	DVOP	8/6/18	4/12/19	11/13/18	3/8/19	2/8/19	YES
Lindell, Sharon	DVOP	10/1/12	4/2/14	3/20/07	4/16/13	N/A	YES
Marquart, Tim	DVOP	2/1/12	8/2/13	6/12/12	11/27/12	N/A	YES

JVSG funded staff	Position	Date Assigned Current Position	Mandatory training completion date	LES/FVE	CM/IS	PPE/EO	Complete Y/N
Mason, Anthony	DVOP	12/1/16	9/15/17	5/26/17	9/15/17	11/17/17	YES
Medina, Anthony	DVOP	10/1/12	4/2/14	10/4/05	3/21/06	N/A	YES
Norway, Sarah	DVOP	8/3/15	2/1/17	9/1/15	1/12/16	N/A	YES
Parks, Dawanta	DVOP	5/1/12	10/31/13	10/30/12	11/27/12	N/A	YES
Rivas, Toby	DVOP	10/4/14	4/4/16	3/17/15	3/3/15	N/A	YES
Ruffin, Jonathan	DVOP	8/29/16	8/11/17	5/26/17	8/11/17	N/A	YES
Savage, Daniel	LVER	1/23/17	6/6/17	9/1/15	1/12/16	6/16/17	YES
Schneider, Colin State Coordinator	LVER	3/1/13	8/31/14	6/12/12	3/3/15	4/9/13	YES
Schomig, Justin	DVOP	8/29/16	8/11/17	5/26/17	8/11/17	N/A	YES
Simmons, Mark	DVOP	3/1/16	10/25/16	9/16/16	10/25/16	N/A	YES
Speed, Cornelius	DVOP	8/6/18	3/22/19	11/27/18	3/8/19	2/8/19	YES
Spindler, William	DVOP	7/1/10	12/31/11	3/6/12	3/22/11	N/A	YES
Stricker, Aaron	DVOP	6/19/17	9/15/17	8/18/17	9/15/17	N/A	YES
Westbrook, Joseph	DVOP	8/3/15	2/1/17	3/19/13	1/29/13	N/A	YES
Whitaker, Felecia	DVOP	1/23/17	9/15/17	5/26/17	9/15/17	N/A	YES
Wilson, Trevor	DVOP	3/4/19	1/17/20	4/7/19	7/19/19	N/A	YES

I. SUCH ADDITIONAL INFORMATION AS THE SECRETARY MAY REQUIRE.

N/A

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.)

As members of the Baby Boom generation continue to retire and leave the workforce there will be fewer people able to fill the current job openings in Colorado. This will create opportunities for older workers in the workforce. Specifically, businesses are recognizing the value of older workers and the cost savings that can be attributed to employing people with many years of work experience.

Colorado's diverse economic base and low unemployment indicate positive prospects for a variety of industry sectors that require the expertise and experience that older workers can provide. Throughout the country, demand for education and healthcare services workers will continue to grow. Teachers and healthcare workers of all levels are needed to meet this demand. Specifically, Colorado's scenic attractions, numerous gaming facilities, and Denver's status as a destination location will increase employment in the tourism, hospitality, and transportation industries.

There are many opportunities for our older workers in Colorado, and based on the participant's physical ability, education, and desire to learn the participant will be directed to jobs opportunities that meet their specific needs. Job opportunities include, working as an administrative assistant in a law or accounting office. Jobs, working in the health care field in hospital guest services, or receptionist in doctor's offices. The jobs may also be working in retail in one of our many tourist communities, or being a host/hostess or server in a restaurant. Working with the states homeless communities, in food banks and shelters to help make others lives better.

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))

Community service assignments for SCSEP participants are carefully selected to train them for unsubsidized employment in areas where local employers have identified unmet needs. With regional economic trends as a broad roadmap, knowledge of the needs of community employer partners is critical to the proven success of our employer-based philosophy. By matching employer needs to the tested and validated skills of SCSEP participants, efforts focus on both employers and participants in areas that meet the needs of both.

The types of training that will be used will be based on the participant's interests and ability when they enter the program. The training the grantees may provide, includes computer skills such as Microsoft Office, customer services skills including how to communicate with consumers, how to present themselves in a retail setting and how to work with what can be at time difficult individuals (people skills). Computer training, which is a key means for increasing the job preparedness of participants, will continue to be provided to participants at local project sites as part of community service assignments in Colorado's Host Agencies. Participants may also be trained in telephone skills on how to answer a phone, how to address individuals and how to listen to what the consumer is asking for and direct them to the appropriate place or individual. Participants could be trained on food service safety and cleanliness and how to properly use a cash register or a Point of Service POS computer. Training takes place at Workforce Centers (WFCs), local community colleges, and through community agencies.

According to the Colorado Department of Labor and Employment, until Colorado's citizens are educated to a level that maximizes their potential, gaps will exist across every skill set through the next several years. Reading comprehension ranks highest at most education levels as a skill facing critical shortages. In fact, there is a significant skill gap for many skills associated with

communication across all education levels. Other skills that show up high on the list of those facing possible shortage for every education level include: critical thinking, troubleshooting, and judgment and decision making abilities. Skill gaps are identified using the Skills Based Employment Projections System, a tool provided by the Projections Managing Partners. Ongoing, each SCSEP participant may participate in services at the local Workforce Center in the county where the participant works to attend classes that enhance/upgrade their skills.

The WFCs use individualized assessments and tests to ensure participant training is customized to the participants' skills and abilities. Within the WFCs there are defined categories that have a career ladder and list of similar jobs, job levels, and next steps.

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))

CO Statewide Occupations with the Highest Projected Annual Openings 2018-2028

SOC | Title | Training and Education Required

35-3021 Combined food preparation and serving workers, including fast food, No formal educational credential

41-2031 Retail salespersons, No formal educational credential

35-3031 Waiters and waitresses, No formal educational credential

41-2011 Cashiers, No formal educational credential

43-4051 Customer service representatives, High school diploma or equivalent

43-9061 Office clerks, general, High school diploma or equivalent

39-9021 Personal care aides, No formal educational credential

37-2011 Janitors and cleaners, except maids and housekeeping cleaners, No formal educational credential

53-7062 Laborers and freight, stock, and material movers, hand, No formal educational credential

43-6014 Secretaries and administrative assistants, except legal, medical, High school diploma or equivalent

CO Vocational Training Occupations with the Highest Projected Number of Openings 2010-2020

SOC | Title

31-1012 Nursing Aides, Orderlies, and Attendants

29-2061 Licensed Practical and Licensed Vocational Nurses

49-3023 Automotive Service Technicians and Mechanics

41-3021 Insurance Sales Agents

39-9031 Fitness Trainers and Aerobics Instructors

25-2011 Preschool Teachers, Except Special Education

39-5012 Hairdressers, Hairstylists, and Cosmetologists

41-9022 Real Estate Sales Agents

25-4031 Library Technicians

49-9021 Heating, Air Conditioning, and Refrigeration Mechanics and Installers

CO Other Occupations with the Highest Projected Number of Openings 2010-2020

SOC | Title

41-2031 Retail Salespersons

35-3031 Waiters and Waitresses

41-2011 Cashiers

35-3021 Combined Food Preparation and Serving Workers, Including Fast Food

43-4051 Customer Service Representatives

43-5081 Stock Clerks and Order Fillers

43-6014 Secretaries, Except Legal, Medical, and Executive

37-2011 Janitors and Cleaners, Except Maids and Housekeeping Cleaners

41-4012 Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products

43-6011 Executive Secretaries and Administrative Assistants

Specific training for the employment of older workers

SOC | Title and description

35-3021 Combined food preparation and serving workers, including fast food, Training may include, specific food prep, food safety training, customer service training and POS training.

41-2031 Retail salespersons, Training may include, POS training, inventory management, customer service skills, and specific product training for the type of retail store they are working in

35-3031 Waiters and waitresses, Training may include, product information, what is in the product and how it is made. Customer service training, appropriate communication with other staff and customers and computer training.

41-2011 Cashiers, Customer services training, POS training, computer training.

43-4051 Customer service representatives, The training may include, how to work with people of all back grounds, how to talk professionally on the telephone, how to address people and Microsoft computer skills

43-9061 Office clerks, general, training may include Microsoft computer skills, general accounting skills including 10 key training. The training may expand on specific filing systems and how to use them and create a new file.

39-9021 Personal care aides, Training may include, customer service training, proper way lifting consumers, how to take care to not injury consumers when helping them with their care, and how to recognize when a consumer may need additional help or care that is not part of the care plan.

37-2011 Janitors and cleaners, Training could include customer service training, proper use of cleaners and chemicals and the hazards that maybe associated with the use of these cleaners/chemicals. Training could also include how to use buffers and floor cleaning machines.

53-7062 Laborers and freight, stock, and material movers, Training may include how to properly life boxes and materials. How to read a pick list for getting materials from a warehouse, basic customer service and how to use specialty equipment such as fork lifts and pallet movers.

43-6014 Secretaries and administrative assistants, Training may include Microsoft training, telephone etiquette, customer service skills, office filing systems, and specific office computer skills.

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))

Colorado's SCSEP will take advantage of the unique resources available through the Colorado Department of Labor and Employment, and its statewide network of Workforce Centers, by utilizing WFC staff to assist in creating opportunities for participants of SCSEP. In addition to providing more opportunities to place participants, Colorado has a cadre of community recruiters who regularly send applicants to SCSEP host agency sites, leveraging the efforts of SCSEP project directors. This gives SCSEP project directors unique recruitment opportunities in their local communities. Project directors are called upon to speak to local business leaders as part of the larger public/private partnership. Project directors will assist the local WFC to implement the "Protocol for Older Workers." Colorado will continue to send SCSEP participants to staff the WFC locations and collaborate with other WFC partners such as Veteran Services, Wagner-Peyser, and Vocational Rehabilitation to maximize participant referrals.

To enhance services to SCSEP participants, Colorado has added the Career Edge System™ to the e-Colorado portal. The Career Edge System™ is an audio and written comprehensive career exploration program available online to career, adult education, and employment centers. This program is at a simplified reading level, includes a completed varied-voice audio component, and is available in English and Spanish. The voices are varied to maintain the interest of nonreaders. The program ties in all components a person needs to make an informed and intelligent career selection. In three steps, a person who has limited English proficiency (LEP) can find appropriate occupations, consider accessible education and training options, search for jobs by location, learn to read career-oriented information, and work systematically toward

employment goals. This system benefits both the LEP customer and the SCSEP staff in accessing services.

The participants of SCSEP come to the program with highly developed soft skills, such as loyalty, strong work ethic, dependability, and honesty. However, many participants may need additional training on current technical and operational skills.

The SCSEP Administrator works closely with all SCSEP providers in the State to identify and coordinate training opportunities. The WFCs play a pivotal role in training the participants. In the rural areas there is a great cooperative effort with all of the agencies and often there is free training in the region through the libraries and non-profit sector.

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))

SCSEP participants have access to a wide array of programs and services. SCSEP programs are encouraged to establish strong linkages with the county department(s) of human services within their region. The program engages these departments as workforce partners to assist low-income individuals, including recipients of public assistance. However, the degree and nature of the relationship will ultimately be determined by the local elected officials and department directors in each county. Regions are encouraged to use the Work Opportunity Tax Credit (WOTC) program as hiring incentives to encourage employers to hire disadvantaged job seekers. Additionally, SCSEP participants 60 and older have the opportunity to participate in the services available through their local Area Agency on Aging (AAA) such as administrative assistants, food service, and environmental services. Colorado's SCSEP participants are placed in community service agencies that include schools, health care, housing, workforce services, recreation, environmental quality, public works, and social services agencies. Likewise, essential and necessary community services are provided to the participants of SCSEP. The following is a list of services that are available to Colorado SCSEP participants:

1. Education/ESL/Tutoring/Libraries
2. Health Care/Hospitals
3. Recreation/Parks/Agriculture
4. Social Services/Welfare/Local Government
5. Economic Development/Counseling/Tax Service
6. Recreation/Senior Center Operations
7. Housing
8. Nutrition Programs
9. Transportation
10. Homemaker Services
11. Caregiver Services
12. Material Aide
13. Legal Assistance

14. Other Counseling Services

Many of the SCSEP participants placed in community programs provide services for the elderly. There is a significant need among agencies that provide various services to the elderly for trained workers. Increased placement and training expenditures per individual in these types of agencies would benefit senior service providers (e.g. adult day care, nutrition programs, and independent living centers), SCSEP participants, and SCSEP contractors. Ongoing training and the development of targeted services for older workers must continue in order to give SCSEP participants a competitive edge.

The SCSEP Administrator incorporates language in Requests for Proposals (RFP) to ensure services are provided to older adults in poverty. A sample of language commonly used in contracts is "in the delivery of services under this contract (provider) agrees to give preference and priority to older adults who meet the following criteria: are of a minority status; are of low income; are homebound; live in a particularly remote area; and live alone or are frail due to health condition or disability." The State ensures that preference will be given to providing services that meet the target criteria through these efforts. Participants of SCSEP that qualify for the services provided through the Older Americans Act will be directed to agencies that provide those services.

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))

Commitment to full access of services for persons with disabilities is mirrored at the State level. The Colorado Department of Labor and Employment (CDLE) and Colorado SCSEP have a long-standing interagency agreement with the Division of Vocational Rehabilitation (DVR) and work closely with DVR on projects such as planning, job development and placement, training, WOTC, and job fairs targeting persons with disabilities. CDLE is a member of the Interagency Consortium and Stakeholders Policy Forum created as a result of Project WIN (Workforce Incentive Network), a multi-year systems change project to identify and develop strategies to remove barriers to employment for persons with disabilities. Several WFCs are involved in Project WIN's "consumer navigator" project.

Colorado abides by, and follows, the Charitable Choice philosophy. The provision in the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) enacted in 1996, and its later revisions, allows the opportunity to contract and work directly with faith-based and community-based organizations. Additionally, it allows these organizations to work with workforce clients who are in need of services.

Over the past four years, Colorado has actively participated in the identification, recruitment, education, and training of faith-based and community-based organizations in order to build better partnerships with WFCs. Thus far, Colorado has been successful using Charitable Choice to partner with faith-based and community-based organizations in helping to serve Colorado's workforce clients.

Colorado State sub-grantees maximize WFCs' ability to serve SCSEP clients, as well as expand and enhance services by utilizing websites that provide comprehensive tools for FBOs/CBOs. The WFCs have assembled a list of service providers in Colorado in the form of an on-line catalogue. The catalogue has the capacity to search for 50 specific services by region and provider, and currently contains over 800 providers.

D. PLANNED ACTIONS TO COORDINATE SCSEP WITH OTHER LABOR MARKET AND JOB TRAINING INITIATIVES. (20 CFR 641.302(J))

A demand-driven SCSEP is made up of the public and private sector policies and programs that help people acquire the knowledge and skills needed to earn a living. This model includes policies and programs that help employers get and maintain a skilled workforce. Unlike separate programs operating in an uncoordinated and static manner, Colorado's SCSEP demand-driven workforce is flexible and able to adapt quickly to changing economic conditions. The demand-driven model is characterized by on-going communication and continual feedback among employers, workers, educators, and governmental agencies.

Labor Market Information's LMI Gateway is an online resource intended to meet informational needs of both the employer and employee community. The {http://www.colmigateway.com/) contains an extensive amount of readily accessible labor market data as well as provides job search capabilities for SCSEP participants. The following is a list of additional key components that support SCSEP:

1. Strategies and incentives that support sustained public and private sector investment in skills development.
2. Strategic linkages among employers, union, educators, governmental, non-governmental organizations, and individual citizens in the labor market to promote system responsiveness to economic needs, and results-based accountability.
3. Labor market information, job placement, employment retention and work support services that increase access to employment and meet the needs of workers and employers, the system's dual customers.
4. Target marketing to new businesses and high-growth industries using direct mail and follow-up telephone calls to introduce customers to available program and services; maintain active membership and participation in local business organizations such as local Chambers of Commerce, economic development groups, and human resource manager groups; conduct business forums at the local level to market local employment and training services and brief attendees on labor market information; and conduct job fairs and on-site recruitment to assist small business high-growth industries, and targeted populations.

The State supports business services efforts through marketing grants and discretionary grants focused on services benefiting employers and delivered through partnerships with the business community.

A major goal of SCSEP is to ensure opportunities for placement for the maximum number of eligible individuals. Therefore, each project sponsor uses every reasonable means to place SCSEP enrollees into unsubsidized employment. The goal established by the U.S. Department of Labor is to place 26.4 percent of all authorized positions into unsubsidized employment during the program year.

Some SCSEP projects have higher goals. Unsubsidized employment is officially defined as:

"Employment in the public or private sector where the former SCSEP participant is not a participant in a federally funded employment and training program. Placements in programs operated by VISTA (now Americorps) shall not be counted as unsubsidized unless they are in non-volunteer positions."

Each project sponsor is encouraged to contact private and public employers directly in an effort to identify and develop suitable unsubsidized employment opportunities for enrollees. Sponsors should also encourage host agencies to employ enrollees. All enrollees must understand their obligation to demonstrate initiative in seeking unsubsidized employment whenever possible. As part of the effort to find unsubsidized placement, enrollees should be strongly encouraged to register as a job seeker with the appropriate local Workforce Center, as well as public sector employers.

Every reasonable means are employed by the sponsor staff to assist enrollees with job search activities including the following strategies:

1. Seek assistance at One-Stop Centers;
2. Seek assistance from local, state and federal employment agencies;
3. Seek assistance from other local agencies;
4. Prevail upon host agencies to accept qualified enrollees into their regular work force;
5. Maintain a liaison with other SCSEP sponsors and state agencies to identify job openings or training opportunities;
6. Identify and seek the assistance of for-profit and non-profit organizations concerned with employment and services for seniors; and
7. Consistently remind enrollees of their responsibility to seek and accept unsubsidized employment.

Some techniques that SCSEP project staff have found useful for increasing unsubsidized employment are:

1. Using motivational techniques with enrollees;
2. Using public relations effectively;
3. Organizing and operating a job club;
4. Training and using a job developer;
5. Training enrollees in job search techniques;
6. Providing training to increase enrollee's skills.
7. Rotating enrollees;
8. Keeping job search records; and
9. Asking host agencies to hire enrollees and move enrollees to another site if they are not considered for job opening.

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)

Prior to enrolling in SCSEP, potential SCSEP participants must enroll with a WFC in the county they reside. Participants will attend WFC classes that enhance/upgrade their skills. Each enrollee looks for a minimum of six jobs a month, and goes on job interviews when a job developer has a possible job opening for the participant's particular skill set. The participant

must work with the job developer to set an interview. The classes and job search will continue until a job is secured.

F. EFFORTS TO WORK WITH LOCAL ECONOMIC DEVELOPMENT OFFICES IN RURAL LOCATIONS.

There are six economic development offices in rural Colorado, specifically under the department of agriculture, in Alamosa; Cortez; Craig; Delta; Las Animas; and Wray. The State SCSEP managers will contact the offices within their respective regions to develop a plan that will maximize the employment and training opportunities for participants in rural Colorado. There may be an opportunity for the offices to become host agencies. As a host agency the office may have an opportunity to increase program visibility in rural Colorado through the assistance of SCSEP participants.

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.)

The State supports business services efforts through marketing grants and discretionary grants focused on services benefiting employers and delivered through partnerships with the business community.

State leadership makes efforts to create new ways of engaging business through collaborative public/private partnerships that utilize technology to resolve critical labor market shortages and deficiencies. State workforce and labor market professionals must work with business to identify the additional skill sets needed in the future and to identify the foundational skills needed to acquire those skills. Additionally, there is a critical need for industry, workforce, and economic development organizations to work together to strengthen the ability and responsiveness of higher education to develop training that meets real time needs of high growth/high demand industries. Finally, there is a need to continue the development of a comprehensive demand-driven system that will provide all Coloradans the opportunity to engage in productive work.

SCSEP staff may make use of the Labor Market Information (LMI), which is an important feature of the One-Stop Career Center System. Through America's Labor Market Information System (ALMIS), job seekers will have access to a database containing information about over ten million employers throughout the country.

The Colorado SECEP program develops job leads and identifies potential employers in the public and private sectors by advertising, attending job fairs, responding to ads in local newspapers, contacting employers (in person, by telephone, and by letter), attending job trainings, speaking at local business meetings, and by asking employers with jobs that are suitable for SCSEP participants to speak at workshops. Also, the Program will continue to use the Internet to access various job search sites in an effort to identify job opportunities for SCSEP participants. The SCSEP partnership with the Workforce Development Centers will continue to be maintained and improved, to offer participants leads on jobs and additional training as needed. To foster good job retention and employer relations, emphasis will continue to be placed on sending qualified and suitable participants to each particular job interview. The typical SCSEP participant usually accepts part-time employment with day time hours during the normal work week. Therefore, the program mostly targets community service organizations and small businesses, since these employers have more of the types of jobs that SCSEP participants are seeking. Also, because SCSEP participants do not normally accept relocations or

extended commutes, the Program has primarily focused on the local, community job markets. A significant portion of the Program's unsubsidized placements occur when the host training sites hire the SCSEP participants that are assigned to them. Program managers and staff will continue to routinely visit host training sites to encourage them to hire their assigned SCSEP participants when there are job openings and available funds. The value and benefits of hiring their SCSEP-trained participants will continue to be emphasized.

3. THE STATE'S LONG-TERM STRATEGY FOR SERVING MINORITY OLDER INDIVIDUALS UNDER SCSEP. (20 CFR 641.302 (C))

In Colorado there was no significant change in service to minorities over the last 4 years. Colorado SCSEP will continue to initiate strategies that encourage minority populations to participate. The sub-grantees recruit minority individuals to the program through a variety of methods and resources. Posters, brochures, and flyers are placed in strategic locations throughout communities specifically to encourage people to consider SCSEP when seeking employment. The program materials and interpreting services are available in Spanish and English. The sub-grantees promote SCSEP where people congregate, such as Social Service agencies, government offices, libraries, senior centers, low-income housing projects, faith based organizations, service/cultural organizations, grocery stores, and medical facilities. Social Service agencies and medical clinics in the counties have referred people who are in need, specifically minority populations and people with disabilities. Advertisements are placed in the local newspapers to market the program, provide eligibility requirements, identify benefits, and promote the emphasis on recruiting minority populations and persons with disabilities.

The State SCSEP program partners with several workforce centers that serve minority populations. The Older Workers Specialist at the workforce center provides information and assistance to the enrollees of the workforce center, focusing on the programs that serve the elderly populations, minorities, and people with disabilities.

In addition, occasionally there are barriers to communication when interpreters are not readily available or if there are dialects that the SCSEP managers are not familiar with. To address these barriers the sub-grantees must be familiar with the different cultures. The US Department of Labor identifies that participants who are most in need are those with multiple barriers to employment: people that are over age 65; limited English proficiency; homeless or at risk of being homeless; have a disability; reside in rural areas; are Veterans or eligible spouses of Veterans; have low employment prospects; have failed to find employment after utilizing services provided under Title I of the Workforce Innovation and Opportunity Act; have the greatest economic need; are minority individuals; and have the greatest social need. The locations of the people that meet the above criteria are located throughout the state. However, many may be found to have just been released from prison; they may live in central metropolitan areas in shelters, on the street or in subsidized housing; and there are participants that are isolated in rural communities; and those that are in segregated areas of the city with minority populations.

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)

The State SCSEP office has identified the need for additional community service training needs in rural Colorado and for individuals throughout the State that have a felony background. Over the next four years, the State will focus on community service opportunities within the targeted

in-demand industries, such as healthcare, IT, manufacturing and construction. The State will partner with community colleges, businesses, and local government to develop a plan of action that will meet the community service training needs of the participants as well as the needs of the business community, thus creating a win-win approach for everyone.

The community service agencies that may meet the needs of the participants include nonprofit thrift stores, correctional industries, Habitat for Humanity, government offices, colleges, hospitals, home health agencies and nonprofit clinics. The goal of the State SCSEP office is to increase the number of host agencies listed above by 5% over the next four years and increase the placement of those hard to serve participants by 5%.

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))

The following collaborative steps comprise the state's long term strategy to improve SCSEP's goals and objectives over the next four years.

Local Workforce Centers

1. Increase the number of people served with multiple barriers by 2% a year over the next four years, specifically those participants that are hardest to serve;
    a. Utilize Colorado work readiness training programs such Key Train, Work Keys and computer literacy courses;
    b. Increase the number of Workforce Center host agencies by 2% a year over the next four years;
    c. Participants will utilize workforce counselors, such as DVR, Veterans, and Older Workers counselors;
    d. Greater opportunities to receive outside funding due to the number of clients served.
    e. Participants will have the opportunity to receive community service training at the workforce center thus will have greater access to services and employment opportunities as they become available.

Community Service Organizations and State Programs will increase at approximately 1% - 2% a year for the next four years.

1. Additional educational services through partnerships with educational institutions and community service assignments;
2. Paid employment training through internships and SCSEP;
3. On the job experience leading to unsubsidized jobs;
4. Increase opportunities for partnerships for grant related funding;
5. Increase access to community and faith based resources; and

6. Increase capacity to clients and participants for needed supportive services; and
7. Participants will receive chemical dependency counseling, food assistance, transportation funding, clothing, housing assistance and healthcare.

Business/Community

1. Increase educated labor pool of SCSEP participants by 1% a year over the next four years;
2. Increase pool of community service workers;
3. Opportunity to complete green energy projects, creating a green community; and
4. Expansion of economic opportunities through doubling the number of On The Job Experience participants over the next four years.

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))

1. In grant year 2019 USDOL has indicated that this year will continue to be used to establish a baseline for the new performance measure. During this time frame the grantee will continue to encourage the sub-grantee to provide participants with the training they will need for unsubsidized employment. This training may include skills training, job seeking and interviewing skills, and the skills needed to obtain and keep meaningful unsubsidized work. Once the base line has been established, then the grantee with the help of the sub-grantee can look at what will need to change, if anything in order for us to meet the goals that have been established by USDOL.
2. The sub-grantee will continue to base community service job training assignments on the participant's assessments and the Individual Employment Plan (IEP). Using these tools will help the sub-grantee place the participant in a community assignment the not only interests them, but is appropriate for the participant's level of skill, previous training, and any physical or mental obstacles that the participant may have. Being in the right assignment will help the participant learn the skills or hone the skills they have to find unsubsidized work that is both meaningful work and work the participate will enjoy.
3. The sub-grantee will continue to monitor and work with the participant after they have found unsubsidized employment to ensure that the participant has the tools and encouragement they need to be successful in their new job. This follow up may include more skills training or coaching. This training will be done through local resources that are at no cost or very little cost to the participant or the SCSEP program. The primary purpose is to enhance the participant's ability to succeed at their new job.
4. The grantee and subgrantee do have some concerns in meeting the unsubsidized goals being set for the state of Colorado. While the unemployment rate is low in Colorado at 2.9% for April, the minimum wage is above the federal minimum wage at $11.10 for 2019 and the economy is strong in Colorado this has and is creating some unique challenges for the SCSEP program. With the higher minimum wage and lower or flat funding we are not able to serve as many people as we have in the past, in PY 2019 our

modified positions is 52. The other major issue and pry more importantly with the good economy in Colorado is the cost of living has increased to a point where it is very difficult for our participants to live without some form of subsidized support from the state or county. Besides food assistance many of our participants receive housing and medical assistance and without this help they would not be able to maintain their current way of life. What we are encountering with unsubsidized work is our participants are turning down the work because if they take the job they will be above the income guidelines to receive some or all of the subsidies they have been receiving. The pay, while good at $11.10 or above still is not enough to support the participant after the program so while they are very grateful for the training, they simply cannot afford to take an unsubsidized job.

5. Colorado and our sub-grantee will continue to work with participants, the workforce centers, and various employers to help our participants find meaningful unsubsidized employment that they are not only qualified for, but that they enjoy doing.

6. As we have done in the past the grantee and subgrantee will continue to monitor all the performance goals so that we are meeting or exceeding the new performance goals that have been set for us.

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))

The 2010 Census found that approximately 85% of Colorado's population lives in urban areas and 15% in rural areas. 13.7% of Coloradans 65 and older live in rural areas, and 7.9% of Coloradans 85 and older live in rural areas.

Specific Population Groups

Priority will be given to special populations in accordance with the Older Americans Act and USDOL rules and regulations. Priority will be given (based on Section 508 of the 2006 OAA Amendments) to individuals who:

1. are age 65 years or older;
2. have a disability;
3. have limited English proficiency or low literacy skills;
4. reside in rural areas;
5. are veterans or the spouse of a veteran;
6. have low employment prospects;
7. have failed to find employment after utilizing services provided under Title I of WIOA;
8. are homeless or at risk of being homeless;
9. have the greatest economic need;
10. are minority individuals; and
11. have the greatest social need.

According to the Colorado State Demographer, the *number* of older adults below the federal poverty level will greatly increase. The human and fiscal impacts are vast. As older adults age, their economic resources dwindle. The 2010 Census found approximately 43,000 persons 65 years and older in Colorado below the federally designated poverty level. If the same percentage (8.1%) of older adults 65 years and older are below the federal poverty level in 2020, Colorado will have more than 72,000 older adults below the federal poverty level. In 2030 more than 100,000 older adults 65 years and older may be below the federal poverty level and in 2040 close to 116,000 may be below the federal poverty level.

The 2000 Census found approximately 71,000 older adults 65 years and older in Colorado below 150% of the federally designated poverty level. In 2010, Colorado had approximately 92,000 older adults below 150% of federal poverty level. In 2020 about 150,000 older adults 65 years and older may be below 150% of the federal poverty level. In 2030 to 2040 there will be over 200,000 people 65 and older that may be below federal poverty level.

Poverty is substantially more prevalent among Hispanic, Black, and American Indian older adults than for all older adults in Colorado. Poverty is only slightly more prevalent among Asian older adults than all older adults combined. Low-income minority older adults are at a higher risk of being unable to obtain housing and healthcare due to affordability, accessibility, and availability within their communities.

Colorado will experience remarkable demographic changes throughout the year 2017. The portion of the total population over the age of 55 will increase to 25 percent from 20.6 percent in 2007. Conversely, the portion of the population in their "prime working years" (generally considered to be between 25 and 54 years of age) will shrink to 40.3 percent from 43.6 percent today. Should the population grow at the same pace it did between 2000 and 2005, Hispanics will account for 25.2 percent of the population while non-Hispanic Whites will comprise about 67 percent of the population. Females will remain almost exactly half of the total population. Colorado SCSEP will continue to use various outreach methods to broaden local awareness in its service areas and encourage unemployed low-income people age 55 and over to apply for SCSEP. For the above information - The Colorado State Unit on Aging, was able to access 2017 data at the time of the state plan submission. This unit is now using the most current data, which is 2018 demographic data. This data is used for all of the OOA programs in the state.

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.

The distribution chart below shows the number of slots allocated to the State of Colorado. AARP, and SER National are the two national grantees. SER National is the State sub-recipient and has 83 slots allocated for the State operations.

SCSEP Equitable Distribution Report	State	AARP	SER	Totals
County				
Adams County, CO	10	21	0	**31**
Alamosa County, CO	3	0	0	**3**
Arapahoe County, CO	5	34	0	**39**
Archuleta County, CO	0	0	2	**2**

SCSEP Equitable Distribution Report	State	AARP	SER	Totals
Baca County, CO	2	0	0	**2**
Bent County, CO	2	0	0	**2**
Boulder County, CO	17	0	0	**17**
Broomfield County, CO	3	0	0	**3**
Chaffee County, CO	0	0	2	**2**
Cheyenne County, CO	0	0	0	**0**
Clear Creek County, CO	0	0	0	**0**
Conejos County, CO	0	0	2	**2**
Costilla County, CO	0	0	0	**0**
Crowley County, CO	1	0	0	**1**
Custer County, CO	1	0	0	**1**
Delta County, CO	0	0	6	**6**
Denver County, CO	18	49	0	**67**
Dolores County, CO	0	0	0	**0**
Douglas County, CO	8	0	0	**8**
Eagle County, CO	0	0	2	**2**
Elbert County, CO	1	0	0	**1**
El Paso County, CO	0	41	0	**41**
Fremont County, CO	0	0	5	**5**
Garfield County, CO	0	0	5	**5**
Gilpin County, CO	0	0	0	**0**
Grand County, CO	0	0	0	**0**
Gunnison County, CO	0	0	1	**1**
Hinsdale County, CO	0	0	0	**0**
Huerfano County, CO	2	0	0	**2**
Jackson County, CO	0	0	0	**0**
Jefferson County, CO	0	0	36*	**36**
Kiowa County, CO	0	0	0	**0**
Kit Carson County, CO	0	0	1	**1**
Lake County, CO	0	0	1	**1**

SCSEP Equitable Distribution Report	State	AARP	SER	Totals
La Plata County, CO	0	0	5	**5**
Larimer County, CO	0	0	20	**20**
Las Animas County, CO	3	0	0	**3**
Lincoln County, CO	0	0	1	**1**
Logan County, CO	0	0	3	**3**
Mesa County, CO	0	0	16	**16**
Mineral County, CO	0	0	0	**0**
Moffat County, CO	0	0	1	**1**
Montezuma County, CO	0	0	4	**4**
Montrose County, CO	0	0	5	**5**
Morgan County, CO	0	0	3	**3**
Otero County, CO	3	0	0	**3**
Ouray County, CO	0	0	1	**1**
Park County, CO	0	0	2	**2**
Phillips County, CO	0	0	1	**1**
Pitkin County, CO	0	0	2	**2**
Prowers County, CO	2	0	0	**2**
Pueblo County, CO	0	0	23	**23**
Rio Blanco County, CO	0	0	1	**1**
Rio Grande County, CO	0	0	2	**2**
Routt County, CO	0	0	2	**2**
Saguache County, CO	0	0	2	**2**
San Juan County, CO	0	0	0	**0**
San Miguel County, CO	0	0	1	**1**
Sedgwick County, CO	0	0	0	**0**
Summit County, CO	2	0	0	**2**
Teller County, CO	0	0	2	**2**
Washington County, CO	0	0	1	**1**
Weld County, CO	0	0	17	**17**
Ute Mt. Ute Tribe	0	0	0	**0**

SCSEP Equitable Distribution Report	State	AARP	SER	Totals
Yuma County, CO	0	0	1	**1**
TOTALS:	83	145	179	**407**

*The only change from the previous year was for SER National, an increase on position for Jefferson county, went from 35 to 36.

3. DESCRIBE CURRENT SLOT IMBALANCES AND PROPOSED STEPS TO CORRECT INEQUITIES TO ACHIEVE EQUITABLE DISTRIBUTION.

The State is sent an Equitable Distribution report by USDOL allocating participant slot placement within the counties the State is required to serve. Currently Colorado is under-serving 76.9% of the counties and over-serving 15.4% with an average of over/under service of 92.3%. The rural counties tend to be under-served and the largest urban county, Denver is over-served. The urban areas are continuing to increase in population while the rural areas are decreasing in population thus contributing to the imbalance of participation. The State will continue to recruit participants in the rural areas. SCSEP recruitment forums will take place in low income senior housing areas, senior centers, libraries and churches throughout the State. In the Urban areas the State will partner with businesses and educational institutions to assist in the placement of individuals that are not able to enroll in SCSEP due to the cap on enrollment in over-enrolled areas of the State. The State will continue to work towards creating a more equitable balance of participation between the rural and urban areas of the State.

Colorado's over enrollment will be reduced through attrition, participants that meet SCSEP time limitations as well as those that have found unsubsidized employment, or have left the program for various reasons. Colorado will make an effort not to enroll new participants in counties that currently are over enrolled. The individuals that apply for enrollment in counties that are over enrolled will be referred to the American Job Centers, businesses that provide on the job training, and educational institutions that provide training for careers that are in-demand.

Counties that are under enrolled will continue to be examined for new opportunities with host agencies and participants. The demographics of each county will be examined, looking for the cities in the underserved counties that have a high low income older adult population. Outreach and education will be targeted to those specific communities and the residents of those communities.

The rural counties are challenged through geographic distance as well as the lack of employment opportunities and host agency training sites. The site managers in the rural areas will continue to serve on the local chamber of commerce committees as well as speak at service organizations. The site managers will be a visible presence in the community educating business owners, nonprofits/government agencies and potential participants of the benefits of SCSEP. Partnerships with local community colleges will continue to evolve, providing participants with the training necessary to meet the needs of a changing workforce.

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.

The State is sent an Equitable Distribution report by USDOL allocating participant slot placement within the counties the State is required to serve. Currently Colorado is under-

serving 76.9% of the counties and over-serving 15.4% with an average of over/under service of 92.3%. The rural counties tend to be under-served and the largest urban county, Denver is over-served. The urban areas are continuing to increase in population while the rural areas are decreasing in population thus contributing to the imbalance of participation.

Colorado's over enrollment will be reduced through attrition, participants that meet SCSEP time limitations as well as those that have found unsubsidized employment, or have left the program for various reasons. Colorado will make an effort not to enroll new participants in counties that currently are over enrolled.

Counties that are under enrolled will continue to be examined for new opportunities with host agencies and participants. The demographics of each county will be examined, looking for the cities in the underserved counties that have a high low-income older adult population. Outreach and education will be targeted to those specific communities and the residents of those communities.

B. EQUITABLY SERVES RURAL AND URBAN AREAS.

The rural counties are challenged through geographic distance as well as the lack of employment opportunities and host agency training sites. The site managers in the rural areas will continue to serve on the local chamber of commerce committees as well as speak at service organizations. The site managers will be a visible presence in the community educating business owners, nonprofits/government agencies and potential participants of the benefits of SCSEP.

The State will continue to recruit participants in the rural areas. SCSEP recruitment forums will take place in low income senior housing areas, senior centers, libraries and churches throughout the State. In the Urban areas the State will partner with businesses and educational institutions to assist in the placement of individuals that are not able to enroll in SCSEP due to the cap on enrollment in over-enrolled areas of the State. The State will continue to work towards creating a more equitable balance of participation between the rural and urban areas of the State.

Additionally, the state will continue to work with the state sub-grantee and the national grantees to ensure rural areas on Colorado are served and maintained at the level needed to ensure all seniors have access to the SCSEP program. Meeting the needs of the participants in rural areas is and will continue to be a challenge, for several reasons, the geographic distance is one which makes it harder to reach the participants readily and on a regular basis. Reliable transportation can be an issue for participants, to get to host agencies or meetings with potential employers. Finding and maintaining hosting is difficult in many rural areas; there are either no host agencies available or there is not the willingness from the non-profits in the areas to become host agencies. The strategy that is currently being used and will continue to be used is to work with a variety of people and government agencies to fill the needs. There is and will continue to be a strong working relationship with the Area Agencies on Aging (AAA's) in all our rural areas, this relationship not only helps participants find out about the SCSEP program, but it also help create some host agencies within the rural communities. SCSEP grantees will continue to work with government agencies like the district attorney's offices in the various rural areas to be host agencies and a strong partner for the SCSEP program.

C. SERVES INDIVIDUALS AFFORDED PRIORITY FOR SERVICE UNDER 20 CFR 641.520. (20 CFR 641.302(A), 641.365, 641.520)

A. Recruitment and Selection of Participants

The Contractor will ensure the following:

1. The recruitment of sufficient numbers of eligible individuals to maintain the established number of authorized;
2. To provide job training assignments for eligible participants with the greatest economic need, greatest social need, poor employment history or prospects, and over the age fifty-five.

B. Enrollment Priorities Include:

1. Veterans and qualified spouses at least aged sixty;
2. Other eligible individuals at least sixty years old;
3. Veterans and qualified spouses aged fifty-five to fifty-nine; and
4. Other eligible individuals aged fifty-five.

Other Special Considerations are:

1. Incomes below the poverty level;
2. Poor employment prospects;
3. Greatest social or economic need;
4. Minorities;
5. Limited English Speaking; and
6. Native Americans.

C. SCSEP Eligibility Shall Be Determined Using The Following Criteria:

1. Age - not less than 55 years of age; no upper age-limit may be applied
2. Income - family income may not exceed 125% of the Federal Poverty Level
3. Residence - at the time of initial enrollment, participants must reside in the state in which the project is authorized (homeless people may qualify).

5. THE RATIO OF ELIGIBLE INDIVIDUALS IN EACH SERVICE AREA TO THE TOTAL ELIGIBLE POPULATION IN THE STATE. (20 CFR 641.325(A))

COUNTY	Eligible Population	Ratio to Total
Adams County	88,703.71	7.15%
Alamosa County	3,509.85	0.28%
Arapahoe County	135,867.93	10.96%
Archuleta County	4,924.82	0.40%
Baca County	994.32	0.08%
Bent County	1,349.68	0.11%

COUNTY	Eligible Population	Ratio to Total
Boulder County	74,826.50	6.03%
Broomfield County	13,192.46	1.06%
Chaffee County	6,253.30	0.50%
Cheyenne County	501.97	0.04%
Clear Creek County	3,279.28	0.26%
Conejos County	2,043.18	0.16%
Costilla County	1,233.18	0.10%
Crowley County	1,083.68	0.09%
Custer County	1,942.16	0.16%
Delta County	9,397.83	0.76%
Denver County	132,004.12	10.65%
Dolores County	584.88	0.05%
Douglas County	73,334.64	5.91%
Eagle County	11,323.17	0.91%
Elbert County	7,968.42	0.64%
El Paso County	144,302.44	11.64%
Fremont County	12,577.03	1.01%
Garfield County	12,951.25	1.04%
Gilpin County	2,005.11	0.16%
Grand County	4,641.74	0.37%
Gunnison County	3,704.39	0.30%
Hinsdale County	268.27	0.02%
Huerfano County	2,458.87	0.20%
Jackson County	453.37	0.04%
Jefferson County	149,992.68	12.10%
Kiowa County	413.94	0.03%
Kit Carson County	1,676.96	0.14%
Lake County	1,665.53	0.13%
La Plata County	15,372.31	1.24%
Larimer County	80,325.98	6.48%

COUNTY	Eligible Population	Ratio to Total
Las Animas County	4,357.66	0.35%
Lincoln County	1,269.18	0.10%
Logan County	5,036.16	0.41%
Mesa County	38,526.92	3.11%
Mineral County	306.61	0.02%
Moffat County	3,109.93	0.25%
Montezuma County	7,375.39	0.59%
Montrose County	11,770.64	0.95%
Morgan County	6,116.69	0.49%
Otero County	4,617.18	0.37%
Ouray County	1,755.36	0.14%
Park County	6,794.06	0.55%
Phillips County	1,095.28	0.09%
Pitkin County	5,376.49	0.43%
Prowers County	2,919.08	0.24%
Pueblo County	41,266.06	3.33%
Rio Blanco County	1,523.75	0.12%
Rio Grande County	3,012.48	0.24%
Routt County	6,383.35	0.51%
Saguache County	1,986.22	0.16%
San Juan County	236.22	0.02%
San Miguel County	2,001.51	0.16%
Sedgwick County	710.79	0.06%
Summit County	6,640.57	0.54%
Teller County	8,396.80	0.68%
Washington County	1,256.64	0.10%
Weld County	56,694.44	4.57%
Yuma County	2,321.44	0.19%

6. THE RELATIVE DISTRIBUTION OF ELIGIBLE INDIVIDUALS WHO:

A. RESIDE IN URBAN AND RURAL AREAS WITHIN THE STATE

Per Colorado's Demographers office 49.45% of the population ages 55-75 live in the 10 County Denver Metro Area (Urban area of CO). The remaining 50.55% of the population lives in rural and frontier areas of the state.

The 2018 final Department of Labor's Quarterly Performance Report (QPR) indicates of the total participants served by the state SCSEP grantees (Colorado, AARP and SER) 22.5% are from rural and frontier areas of Colorado.

B. HAVE THE GREATEST ECONOMIC NEED

Data from the Federal census indicates that 7.8% of the Colorado population 60+ are in poverty.

The 2018 final QPR indicates of the total participants served by the state SCSEP grantees 91.67% are below poverty level and 71% are receiving public assistance.

C. ARE MINORITIES

Per the Colorado Demographers office in 2018 for the population age 55-75, 1.3% was American Indian, 2.7% was Asian/Pacific Islander and 3.6% was Black. 7.1 percent of the population is Hispanic.

The 2018 final QPR indicates the state SCSEP grantees participant population was 31.2% minority and 26.7 Hispanic.

D. ARE LIMITED ENGLISH PROFICIENT

The data extrapolated from the Department of Labor's Quarterly Performance Report for year end 2018 for the Colorado State grantees indicates that 3.3% are limited English proficient.

E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))

The data below is extrapolated from the Department of Labor's Quarterly Performance Report for Year End 2018 and indicates that 32% of participants have the greatest social need, they live in a rural area and are at risk of being homeless or are homeless. (20 CFR 641.325(b))

Population description	Percentage
Homeless or at risk of being homeless	90%
Over 75	6.60%
Individuals with disabilities	36%
Residing in rural areas	22.50%
Individuals with a severe disability	5.30%
Frail individuals	2%
Individuals who failed to find employment after using WIA Title I	0.00%

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))

Transition Planning Activities

Two months prior to reaching the durational limit, the participants will meet with SCSEP counselors to discuss transition options. The participant is given the following options:

1. Apply to WIOA for services through the local workforce centers;
2. If the participant is a Veteran, work with the Veteran service officer for assistance in finding employment or assistance in enrolling in the local community college;
3. Participants with disabilities will be referred to a vocational rehabilitation counselor to receive employment training and job search assistance, and
4. Participants will be encouraged to apply to a local county human services office for assistance through programs such as Supplemental Nutrition Assistance Program, Aid to the Needy Disabled, and Medicaid.

Participants transitioning out of the program will participate in an intensive job search training program developed in coordination with the local workforce center that will address the following skills:

1. Resume writing;
2. Networking;
3. Employment research through the workforce centers and on-line; and
4. Interviewing Skills.

Participants will work directly with their SCSEP case manager to find a position through On The Job Experience (OJE). The participant and the case manager will work together making cold calls to prospective employers and promote OJE through SCSEP. The participants will be given training on the computer and may be assigned to a mentor through Senior Corp or Retired Senior Volunteer Program (RSVP) to assist them with job search activities.

At this time there are two national providers in Colorado, AARP and SER National, both of the organizations are strong and have a good relationship with each other in the state as well as with the State Unit on Aging (SUA). The state does not see any reason to think there will be any transitional issues after the competition is complete. In continuing the good relationship the SUA has with both organizations, any concerns can be corrected with no gap in service to the participants.

The state and the national organizations will handle the Census data and changes the same way all other changes in Colorado are handled, whether it is due to increase minimum wage or a decrease or flat funding. No participant is cut from the program, all changes that need to occur, occur through either duration max for individuals or by individuals leaving the program for other reasons such as health or death.

PERFORMANCE INDICATOR APPENDIX

ALL WIOA CORE PROGRAMS

All WIOA Core Programs

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 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

OTHER APPENDICES

N/A